Bellrock Offshore Wind Farm

Wind Farm Development Area

Environmental Impact Assessment Report - Volume II

Chapter 5: Environmental Impact Assessment Methodology

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Glossary of Terminology

Term	Definition
Applicant	Bellrock Offshore Wind Farm Limited, the legal entity submitting Section 36 Consent and Marine Licence applications for the Bellrock Offshore Wind Farm Development Area.
Bellrock Offshore Wind Farm (or the Bellrock Project)	An offshore wind farm capable of exporting up to 1.8 GW of renewable energy to the National Electricity Transmission System. The Wind Farm Development Area is located 120 km east of Stonehaven, and will connect to the National Electricity Transmission System at the proposed SSEN Transmission Hurlie substation, west of Stonehaven in Aberdeenshire. The Bellrock Offshore Wind Farm comprises of the following Development Areas: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Cable protection	Protective measure to minimise the effects of scour and hazards along the inter-array cables, and protecting these cables at infrastructure crossing points.
Construction works	Works to install the Wind Farm Infrastructure as authorised by the Wind Farm Development Area Section 36 Consent/Marine Licence, such as: ▪ Site preparation works undertaken after commencement of construction; ▪ Pre-installation surveys (intrusive and/or non-intrusive); ▪ Placement on or installation in the seabed of anchors and associated scour protection, and mooring lines, and associated scour protection; ▪ Towing or transportation of the floating offshore unit to the Wind Farm Development Area from a port or wet storage facility; ▪ Floating offshore unit installation and commissioning, including hooking-up to the pre-installed mooring system; ▪ Trench excavation for inter-array cables; ▪ Laying of inter-array cables in or on the seabed and, associated cable protection; ▪ Installation of subsea cable hubs, including placing of associated foundation; ▪ Final commissioning following cable connections and snagging; and ▪ Post installation surveys.
Development Area	For consenting purposes, the area for which separate consents and/or Marine Licences will be sought by the Applicant, comprising: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Floating offshore unit	The combined wind turbine generator and floating substructure.

Term	Definition
Floating substructure	A floating structure which provides buoyancy and, in conjunction with the station keeping system, supports a superstructure (e.g. wind turbine generator or offshore substation), and maintaining its position within the structure's excursion limit.
Inter-array cable	Armoured cable containing electrical and fibre optic cores, which link the wind turbine generators to each other and to the subsea cable hubs and/or the offshore substations and include dynamic inter-array cable and static inter-array cable sections.
Interconnector cable	Armoured cable containing electrical and fibre optic cores which link two or more offshore substations.
National Electricity Transmission System	The high-voltage electricity power transmission network serving Great Britain which receives electricity from generators (such as offshore wind farms) and transmits that electricity to anywhere on the National Electricity Transmission System to satisfy demand.
Offshore export cable	Armoured cable containing electrical and fibre optic cores between the offshore substation(s) and the transition joint bay(s).
Offshore substation	An offshore platform which houses electrical equipment such as transformers, switchgear, and protection and control systems, enabling the wind farm's renewable electricity to be received via inter-array cables and exported via the offshore export cables.
Offshore Transmission Development Area	The boundary within which the Offshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned (and includes the whole of the Wind Farm Development Area).
Offshore Transmission Infrastructure	Infrastructure located within the Offshore Transmission Development Area including fixed bottom and/or floating offshore substations, offshore reactive compensation station(s) and associated scour protection; interconnector cables and associated cable protection; and offshore export cables and associated cable protection (including activities associated with the Offshore Transmission Infrastructure construction, operation and maintenance, and decommissioning).
Onshore Transmission Infrastructure	Infrastructure located within the Onshore Transmission Development Area including transition joint bay(s); onshore export cables; onshore substation; temporary construction compounds; temporary working areas; environmental mitigation areas; drainage/irrigation infrastructure; access works; and any other associated infrastructure (including activities associated with the Onshore Transmission Infrastructure construction, operation and maintenance, and decommissioning).
Project design envelope	Includes all relevant technical, spatial and temporal elements of the Wind Farm Infrastructure, and the proposed methodology to be employed for construction, operations and maintenance, and decommissioning.
ScotWind	A Crown Estate Scotland leasing round for offshore wind projects in which the process enabled developers to apply for seabed rights to plan and build wind farms in Scottish waters.
Scour protection	Protective material positioned around anchors to avoid sediment being eroded as a result of the flow of water.

Term	Definition
SSEN Transmission Hurlie substation	The onshore substation to be developed by SSEN Transmission, which will receive renewable electricity from the Bellrock Project onshore substation and allow supply of renewable electricity from the wind farm to the National Electricity Transmission System.
Static inter-array cable	The section of inter-array cable that is not designed to move.
Station keeping system	The system (including mooring lines and anchors) used to hold a floating substructure within its excursion limit and maintains the intended orientation of the floating substructure.
Subsea cable hub	A subsea device, with a gravel pad foundation, which allows the connection of multiple inter-array cables.
Wet storage	The temporary storage/anchorage of floating substructures and/or floating offshore units prior to their transportation to the relevant Wind Farm Development Area/Offshore Transmission Development Area.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned.
Wind Farm Infrastructure	Infrastructure located within the Wind Farm Development Area including wind turbine generators; floating substructures, station keeping systems and associated scour protection; inter-array cables and associated cable protection; subsea cable hubs; and ancillary infrastructure including buoys (including activities associated with the Wind Farm Infrastructure construction, operation and maintenance, and decommissioning).
Wind turbine generator	A wind turbine generator converts wind energy into electrical energy. The main components include rotor assembly (composed of three blades and a hub); nacelle (containing the generator, shaft and gearbox, power electronic converter and transformer); and a tower (containing lifting equipment and switchgear).

Glossary of Abbreviations

Term	Definition
CEA	Cumulative effects assessment
CEF	Cumulative Effects Framework
Cefas	Centre for Environment, Aquaculture and Fisheries
CIEEM	Chartered Institute of Ecology and Environmental Management
COWRIE	Collaborative Offshore Wind Research into The Environment
EEA	European Economic Area
EIA	Environmental impact assessment
EMP	Environmental Management Plan
EU	European Union
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FOU	Floating offshore unit
FSS	Floating substructure
GW	Gigawatt
HRA	Habitats Regulations Appraisal
IEMA	Institute of Environmental Management and Assessment
INNSMP	Invasive Non-native Species Management Plan
MCA	Maritime Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MPCP	Marine Pollution Contingency Plan
ncMPA	Nature conservation Marine Protected Area
NEEOG	North East and East Ornithology Group
NLB	Northern Lighthouse Board
NPF4	National Planning Framework 4
OfSS	Offshore substation
OfTDA	Offshore Transmission Development Area
OnTDA	Onshore Transmission Development Area
OSPAR	Convention for the Protection of the Marine Environment of the Northeast Atlantic

Term	Definition
OWF	Offshore wind farm
PAC	Pre-application consultation
PAD	Protocol for Archaeological Discoveries
RIAA	Report to Inform Appropriate Assessment
SKS	Station keeping system
SLVIA	Seascape and Landscape Visual Impact Assessment
SNH	Scottish Natural Heritage
SSEN	Scottish and Southern Electricity Networks
WFDA	Wind Farm Development Area
WSI	Written Scheme of Investigation
WTG	Wind turbine generator

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5 Environmental Impact Assessment Methodology

5.1 Introduction

1. This environmental impact assessment (EIA) methodology chapter describes the principles of EIA and the approach taken to identify and evaluate likely significant effects of the Bellrock Wind Farm Infrastructure located within the Bellrock Wind Farm Development Area (WFDA), on the physical, biological and human environment.

2. As discussed in **Chapter 1: Introduction (Volume II)**, the Bellrock Project comprises the following three Development Areas for which separate consents and/or licences will be sought by the Applicant:

   - The Bellrock WFDA within which the Bellrock Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned;
   - The Bellrock Offshore Transmission Development Area (OfTDA) within which the Bellrock Transmission Infrastructure will be constructed, operated and maintained, and decommissioned; and
   - The Bellrock Onshore Transmission Development Area (OnTDA), within which the Bellrock Onshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned.

3. The EIA process involves understanding the proposed construction, operation and maintenance (O&M), and decommissioning activities of the Bellrock Wind Farm Infrastructure, and the environment within which the Bellrock WFDA is located. The potential impacts of the Bellrock Wind Farm Infrastructure are then evaluated to determine the resulting potential effects upon the receiving environment/receptors and the significance of those (either positive or negative) effects. This enables the predicted effects of the Bellrock Wind Farm Infrastructure to be understood by statutory consultees, and other interested parties such as members of the public, and the relevant determining authorities before a consenting decision is made.

4. Schedule 3 of the Marine Works (environmental impact assessment) Regulations 2007 and Schedule 4 of the Electricity Works (environmental impact assessment) (Scotland) Regulations 2017 (hereafter termed the 'EIA Regulations') states that the description of the likely significant effects should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. For receptors which are scoped in, these factors are assessed in full in the EIA technical chapters (**Chapters 6** – **19 (Volume II)**).

5. This Chapter details the assessment methodology for the assessment of likely significant effects of the Bellrock Wind Farm Infrastructure as well as for cumulative and inter-related effects. This Chapter also details the stakeholder consultation and engagement that has been undertaken as part of the EIA process.

5.2 The Environmental Impact Assessment Process

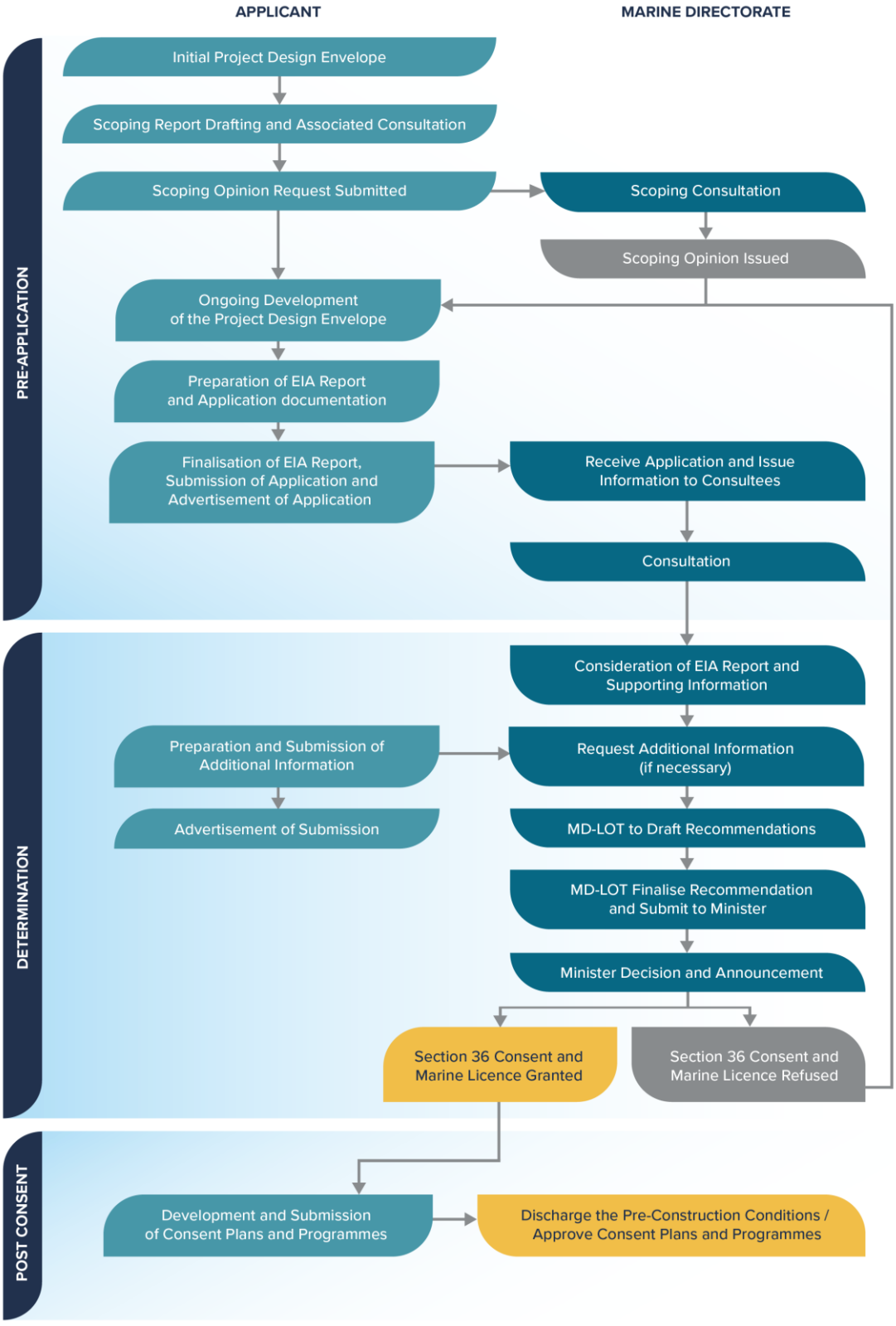
6. The overall EIA process is delivered through several clearly defined stages, namely scoping, consultation, environmental assessment and reporting, determination and post-consent monitoring (if required):

- **Scoping** involves the production of a Scoping Report to request a formal Scoping Opinion from Scottish Ministers (**Section 5.3**);
- **Consultation** undertaken to inform the design and assessment of the Bellrock WFDA (**Section 5.3**);
- **EIA Report** which considers the responses to consultation, and which includes the results of the EIA for each technical receptor (**Sections 5.9** to **5.13**);
- **Determination** involves the examination of the Bellrock WFDA application documents, including this Bellrock WFDA EIA Report, by the competent authority, after which they must reach their reasoned conclusion on the likely significant effects of the Bellrock WFDA on the environment. The competent authority[1] must publish their 'decision notice'; and
- **Monitoring** may be undertaken during the site preparation works, construction works, O&M works, or decommissioning works associated with the Bellrock WFDA. This may be a requirement as part of the decision notice.

7. **Plate 5.1** provides an overview of the stages involved in the EIA and consenting process.

[1] For the Bellrock WFDA, the competent authority is the Scottish Ministers, with MD-LOT acting on their behalf.

Plate 5.1: Stages of the Consenting Process in Scottish Waters



5.3 Environmental Impact Assessment Scoping

8. Scoping is intended to inform a proportional and robust approach to assessment through early-stage evaluation and reporting of identified likely significant effects in the Bellrock WFDA EIA Report. This proactive process allows for a robust EIA whilst focusing on environmental impacts which could give rise to likely significant effects.

9. On 22 March 2024, the Bellrock WFDA Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**) was submitted to Marine Directorate – Licensing Operations Team (MD-LOT) covering the Bellrock Wind Farm Infrastructure.

10. The Bellrock WFDA Scoping Report provided information on:

- The Bellrock Wind Farm Infrastructure;
- The proposed EIA methodology to characterise baseline conditions within the WFDA and address environmental impacts;
- The proposed Cumulative Effects Assessment (CEA) methodology;
- Topics and impacts proposed to be scoped into the Bellrock WFDA EIA Report, where there is potential for significant effects on receptors; and
- Topics and impacts proposed to be scoped out of the Bellrock WFDA EIA Report, where there is no potential for significant effects on receptors.

11. Following receipt of the Bellrock WFDA Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**), MD-LOT (on behalf of the Scottish Ministers), in accordance with the EIA Regulations, undertook consultation with stakeholders. The purpose of the consultation was to seek representations to aid the Scottish Ministers' consideration of which potential effects should be scoped in or out of the Bellrock WFDA EIA Report. The resulting Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**) was received from MD-LOT on 8 August 2024 and, as per the EIA Regulations, forms the basis of this Bellrock WFDA EIA Report, with additional consultation relevant to the individual technical chapters detailed as appropriate in the relevant technical chapters (**Chapters 6 to 19 (Volume II)**).

12. This Bellrock WFDA EIA Report considers and refines the project information for the Bellrock Wind Farm Infrastructure provided in the Bellrock WFDA Scoping Report (see **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)**) for changes to the scope of the Bellrock Wind Farm Infrastructure and the Bellrock Project grid connection). Full details of the Bellrock Wind Farm Infrastructure are provided in **Chapter 4: Project Description (Volume II)**.

13. As set out in **Table 5.2**, the Scoping Opinion for the Bellrock WFDA stated: *"In the event that the Developer does not submit application(s) for a s.36 consent under the 1989 Act and a marine licence under the 2009 Act for the Proposed Development within 12 months of the date of this Scoping Opinion, the Scottish Ministers strongly recommend that the Developer seeks further advice from them regarding the validity of the Scoping Opinion"*(**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**).

14. The Bellrock WFDA consent application is being submitted around 20 months since the Scoping Opinion was issued. As such, the Applicant has discussed this time frame with MD-LOT to address the continued validity of the Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**). As per advice from MD-LOT (**Table 5.2**) The Applicant has engaged with relevant stakeholders to determine whether any updated guidance or new relevant considerations have emerged since the scoping opinion was issued (See **Section 5.4** for details of consultation undertaken throughout the development of the EIA). The Applicant has also actively monitored Scoping Opinions and EIA Representations for other ScotWind and INTOG projects as they are published, to take account of matters raised by stakeholders which may be of relevance to the Bellrock WFDA as necessary, to manage the longer timeframe between Scoping and Application.

15. The Applicant also notes that the scope of the project design envelope for the Bellrock Wind Farm Infrastructure has changed since submission of the Bellrock WFDA Scoping Report (see **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** for changes to the scope of the Bellrock Wind farm Infrastructure), including an increase in export capacity from 1.2 to 1.8 GW. The boundary of the Bellrock WFDA remains the same, and it is the view of the Applicant that the associated increase in the number of wind turbine generators (WTGs) will not give rise to any new or different types of impacts to those considered at the Scoping phase. This Bellrock WFDA EIA Report is based on the Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**), as required by the EIA Regulations, but the Applicant has also had regard to subsequent advice provided by MD-LOT and stakeholders (including ongoing consultation). The EIA has not deviated from the advice provided within the Scoping Opinion, apart from where further advice has been provided or where it has been determined, following assessment undertaken in preparation of the Bellrock WFDA EIA Report, that a pathway for a likely significant effect does not in fact exist, and this has been presented clearly within the EIA Report.

16. The Applicant considers the existing Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**) remains valid and, along with additional consultation undertaken, continues to be a reasonable and appropriate basis for the assessments undertaken in this Bellrock WFDA EIA Report.

5.3.1 Topics Scoped Out of the Environmental Impact Assessment

17. A guiding principle of EIA is to undertake a proportionate level of assessment to the risk posed. EIA scoping aims to determine which environmental technical chapters could identify significant effects as a result of the Bellrock WFDA and therefore require further assessment, as well as which topics are unlikely to identify significant effects and therefore do not need to be considered further.

18. The Bellrock WFDA Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**) proposed that certain technical chapters should be scoped out from further assessment on the basis that significant environmental effects are not anticipated. A list of the technical chapters scoped out and the justification for each is provided in **Table 5.1**. The Scoping Opinion for the Bellrock WFDA (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**) agreed to these technical chapters being scoped out of the EIA. Only potentially significant effects have been 'scoped in' to the EIA and have been assessed in the technical chapters (**Chapters 6 to 19 (Volume II)**) of this Bellrock WFDA EIA Report.

Table 5.1: Technical Chapters Scoped Out

Chapter/Topic	Justification
Air quality	Vessels utilised during construction, O&M, and decommissioning of the Bellrock WFDA will contribute to emissions offshore; however, in the context of the existing vessel traffic within the North Sea, the Bellrock WFDA's contributions to offshore air quality would be small. Because the Bellrock WFDA is located 120 km from the coast at Stonehaven (116 km southeast of Peterhead), construction and O&M works would be carried out at a distance from the shore and therefore would not impact upon onshore human or ecological receptors.
Seascape and Landscape Visual Impact Assessment (SLVIA)	Significant effects on offshore seascape character receptors are unlikely to arise due to their low sensitivity. Significant effects on offshore visual receptors are unlikely to arise due to their generally low sensitivity, and/or their transient nature within the SLVIA study area. Due to distance (120 km from the coast at Stonehaven and 116 km southeast of Peterhead), significant effects on coastal and onshore landscape character, or on visual receptors located on land, are unlikely to arise.

19. Human has been considered, where appropriate, in the technical chapters, but no standalone chapter is provided, for example in **Volume II**:

- **Chapter 6: Marine Geology, Oceanography and Physical Processes;**
- **Chapter 12: Shipping and Navigation;**
- **Chapter 13: Aviation and Radar;**
- **Chapter 14: Marine Infrastructure and Other Users;**
- **Chapter 16: Socioeconomics, Tourism and Recreation;**
- **Chapter 17: Greenhouse Gas Assessment;** and
- **Chapter 19: Major Accidents and Disasters.**

5.4 Consultation and Stakeholder Engagement

20. Regular engagement with stakeholders has been key to the delivery of the EIA for the Bellrock Wind Farm Infrastructure. Engagement undertaken to support early planning of the Bellrock Wind Farm Infrastructure, scoping and post-scoping activities has been through virtual and in-person meetings, workshops, and wider industry events with a wide range of statutory and non-statutory stakeholders. The purpose of this engagement has been to provide general updates on the development of the Bellrock WFDA, including programme and survey updates; identifying and discussing potential constraints with environmental, social and economic stakeholders; and receiving notification of any forthcoming regulatory guidance or updates. Stakeholders and local communities have also had the opportunity to provide feedback on all aspects of the Bellrock Wind Farm Infrastructure, and inform the scope of studies, surveys and assessments being undertaken, and influence the project design. Stakeholders have also helped to inform the Applicant on baseline

environmental conditions and potential mitigation strategies. Details of stakeholder engagement are discussed in **Chapters 6 to 19 (Volume II)**. This is in accordance with best practice and guidance and builds on feedback provided by MD-LOT's consultees in the Scoping Opinion for the Bellrock WFDA (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**).

21. In line with the Scoping Opinion for the Bellrock WFDA (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**), a Gap Analysis is submitted alongside this Bellrock WFDA EIA Report directly to MD-LOT. The Gap Analysis records the environmental concerns identified during the scoping process and ongoing consultation and has been used to inform the Bellrock WFDA EIA Report. The Gap Analysis is also used to demonstrate how the Bellrock WFDA Scoping Opinion is reflected in this Bellrock WFDA EIA Report.

22. **Appendix 5.2: Pre-application Consultation Report (Volume IV)** sets out the stakeholder consultation and stakeholders engaged during the pre-application stage of the Bellrock WFDA and has informed this Bellrock WFDA EIA Report.

5.4.1 Summary of Consultation Events

23. As the Bellrock WFDA falls outside 12 nautical miles (nm), the Marine Licensing (Pre-application Consultation (PAC)) (Scotland) Regulations 2013 (the 'PAC Regulations') do not apply to the Bellrock WFDA. However, in the Bellrock WFDA Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**), the Applicant has committed to adopting the principles of PAC for the Bellrock WFDA to ensure that all potential stakeholders are aware of the Bellrock WFDA prior to the submission of the s.36 Consent and Marine Licence application supported by this Bellrock WFDA EIA Report. This includes:

- Fishers consultation events held in Peterhead and Fraserburgh on 9 and 10 May 2023 respectively, to discuss fisher activity within and around the Bellrock WFDA;
- Public exhibition events that were held in local communities (Peterhead, Fraserburgh, Longside, Mintlaw and Crimond) between 5 to 9 February 2024 inclusive, to provide local stakeholders with an opportunity to meet the Applicant, find out more about the Bellrock Project, discuss the proposed infrastructure and fisher activities within and around the Bellrock WFDA and ask any questions. The public consultation event was supported by a virtual consultation room;
- Exhibiting at the Scottish Skippers Expo on 9 and 10 May 2024 to raise awareness of the Bellrock Project and facilitate engagement with commercial fisheries and other marine users;
- Exhibiting at the Scottish Traditional Boat Festival between 21 – 23 June 2024 inclusive to raise awareness with general public and local stakeholders;
- A Bellrock Project update consultation letter, emailed to 210 stakeholders in October 2025 outlining key updates to the Bellrock Project since the Bellrock WFDA Scoping Report (**Appendix 1.1**: **Bellrock WFDA Scoping Report (Volume IV)**). The letter also notified these stakeholders of the virtual consultation event that was scheduled for 17 – 30 November 2025 inclusive; and
- A Bellrock virtual consultation event, running between 17 – 30 November 2025 inclusive open to all stakeholders and including online consultation with four live Q&A sessions with the Applicant and digital feedback forms. The consultation event provided updated project design

information and preliminary environmental information from the Bellrock WFDA EIA, and provided an opportunity for stakeholders to provide feedback.

24. Full details on how the principles of PAC have been considered are provided in **Appendix 5.2: Pre-application Consultation Report (Volume IV).**

5.4.2 Consultation Relevant to Environmental Impact Assessment Methodology

25. Consultation undertaken relevant to the Bellrock WFDA EIA methodology and general project development is provided in **Table 5.2** below. This considers feedback from the Bellrock WFDA Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**).

26. The Applicant held a Scoping Workshop with MD-LOT, Marine Directorate - Science Evidence Data and Digital, Marine Directorate - Marine Analytical Unit and NatureScot in October 2023 to present the approach to scoping and impact assessment of the Bellrock Wind Farm Infrastructure and to gain feedback on key receptors and the key impact assessment methodologies to be adopted. Information packages for all technical receptors were provided for the Bellrock WFDA Scoping Workshop, with a number of breakout sessions held for more detailed discussion. Technical comments raised in the Scoping Workshop are discussed as necessary in **Chapters 6 to 19 (Volume II)** with generic comments provided in **Table 5.2** below.

Table 5.2: Consultation Relevant to EIA Process and EIA Methodology for the Bellrock WFDA

Consultee	Date/Document	Comment	How/Where Comment is Addressed
MD-LOT	Bellrock WFDA Scoping Opinion (2024).	The Scottish Ministers advise that the Developer must make every attempt to narrow the range of options. Where flexibility in the design envelope is required, this must be defined within the EIA Report and the reasons for requiring such flexibility clearly stated. At the time of application, the parameters of the Proposed Development should not be so wide-ranging as to represent effectively different projects. To address any uncertainty, the EIA Report must consider the potential impacts associated with each of the different scenarios. The criteria for selecting the worst-case and the most likely scenario, together with the potential impacts arising from these, must also be described. The parameters of the Proposed Development must be clearly and consistently defined in the application for the s.36 consent and marine licences and the accompanying EIA Report.	Throughout the technical chapters of the Bellrock WFDA EIA Report (**Chapters 6–19**), a parameter-based design envelope has been applied that limits flexibility to only what is necessary to the continued development of the Bellrock Project. Realistic worst-case scenarios have been assessed for all technical topics. The final design will be confirmed post-consent, and a realistic worst-case scenario derived from the design envelope and representing the greatest potential impact is assessed to ensure all other design scenarios would result in equal or lesser effects. Further detail is provided in **Section 3.7** and **Chapter 5 (Volume II)**,of the EIA Report.
MD-LOT	Bellrock WFDA Scoping Opinion (2024).	The EIA Regulations require that the EIA Report include 'a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the Developer, which are relevant to the proposed works and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'. The Scottish Ministers acknowledge Section 3 of the Developer's Scoping Report setting out the consideration of alternatives to date together with the planned activities that are proposed to inform the EIA Report further. The Scottish Ministers advise however that these considerations must include how decommissioning has been taken into account within the design options. The Scottish Ministers advise that this must be based on the presumption of as close to full removal as possible of all infrastructure and assets and should consider the methods and processes of doing so.	Consideration of alternatives is detailed in **Chapter 4: Project Description (Volume II)**, with consideration of alternatives specifically for decommissioning outlined in **Section 3.7.8**. Furthermore, details on alternative locations are discussed in **Section 3.4**, details on alternative layout are discussed in **Section 3.6**, and details on alternative technologies are discussed in **Section 3.7**.

Consultee	Date/Document	Comment	How/Where Comment is Addressed
MD-LOT	Bellrock WFDA Scoping Opinion (2024).	For the avoidance of doubt, the Scottish Ministers advise that the EIA Report must include an up to date consideration of the reasonable alternatives studied as the parameters of the Proposed Development have been refined. This includes but is not limited to the identification of the potential wind turbine layouts within the array area. The Scottish Ministers expect this to comprise a discrete Section in the EIA Report that provides details of the reasonable alternatives studied across all aspects of the Proposed Development and the reasoning for the Selection of the chosen option(s), including a comparison of the environmental effects.	Consideration of alternatives is detailed in **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)**, of the Bellrock WFDA EIA Report, with details on alternative locations discussed in **Section 3.4**, details on alternative layout are discussed in **Section 3.6,** and details on alternative technologies discussed in **Section 3.7**. WTG layouts are typically considered within a SLVIA which was scoped out from consideration in this Bellrock WFDA EIA Report. However, **Section 3.6** details how mitigation measures relevant to the Bellrock WFDA layout have been considered and adopted to reduce significant impacts to relevant receptors.
MD-LOT	30 October 2023, Bellrock WFDA Scoping Workshop. Email Response 15 December 2023.	MD-LOT are currently considering acceptability of a six month cut off period for any other projects/plans considered quantitatively in the CEA, with the aim to provide consistent approach across all Scottish projects in progress. MD-LOT will respond on this separately. MD-LOT understands NatureScot will respond on guidance to be followed for the CEA.	Noted. No further response was made by MD-LOT on this matter. **Appendix 5.3: CEA Long List of Projects (Volume IV)** presents the CEA screening and has been based on a four month cut off period for other projects and plans which represents a shorter cut-off than the six months that was proposed in the Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**). The Bellrock WFDA EIA Report has taken account of phase of other projects and plans (i.e. scoping, application, consent, construction, operation) publicly available as of December 2025, four months prior to the submission of the consent application for the Bellrock Wind Farm Infrastructure, with the exception of **Chapter 9: Marine Mammals (Volume II)** which uses a six month cut-off for modelling, and **Chapter 10: Offshore Ornithology (Volume II)** which uses the North East and East Ornithology Group (NEEOG) led cumulative work package as agreed with NatureScot, Feb 2025. Further details on the approach for specific receptors is discussed in technical chapters (**Chapters 6 – 19 (Volume II)**) as appropriate. The Applicant considers this an appropriate cut-off, ensuring that other recent projects are considered within the CEA whilst allowing sufficient time for a robust assessment of cumulative effects to be undertaken.

Consultee	Date/Document	Comment	How/Where Comment is Addressed
MD-LOT	30 October 2023, Bellrock WFDA Scoping Workshop. Email Response 15 December 2023.	*Considering the Scottish Government consultation paper "Tackling the Nature Emergency – strategic framework for biodiversity" - can any advice be provided around expected levels of biodiversity enhancement that might be expected for offshore works in addition to embedded and additional mitigation?* For offshore wind, MD-LOT will be developing an approach to Scottish Biodiversity Strategy implementation as part of the process to develop an approach to implementation of the strategic compensation provisions in the Energy Bill over the next six months. There are currently no proposed statutory targets, or indicators to measure progress.	Noted. During the detailed design of the Bellrock Wind Farm Infrastructure, consideration will be given to opportunities to apply Nature Inclusive Design to the Project in order to contribute to biodiversity enhancement and nature positive outcomes, in line with available guidance at the time (see **Chapter 4: Project Description (Volume II)** for details).
MD-LOT	30 October 2023, Bellrock WFDA Scoping Workshop. Email Response 15 December 2023.	MD-LOT would have no objection to the provision of two HRA Screening Reports; however, MD-LOT has a query around the split of WFDA and [Offshore Transmission Development Area] OfTDA. The diagram on slide 15 appears to show that the OfTDA EIA overlaps with the WFDA EIA. Could the Applicant please provide some narrative around this and what this means for the respective EIAs.	A Scoping Report for the Bellrock WFDA has been provided (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**), and the Applicant has received a Scoping Opinion from MD-LOT (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**). This Bellrock WFDA EIA Report considers the infrastructure which is located within the WFDA and comprises WTGs, FSSs and SKSs and associated scour protection; IACs and associated cable protection; and subsea cable hubs. A **Shadow Habitats Regulations Appraisal (HRA) (Volume VI)**, for the Bellrock WFDA is submitted alongside this Bellrock WFDA EIA Report, which builds on the Bellrock WFDA HRA Screening Report (see Appendix A, within **the Report to Inform Appropriate Assessment (RIAA) Part 1: Introductory Chapters (Volume VI)**). A separate EIA Report and RIAA for the Bellrock OfTDA (covering the Offshore Transmission Infrastructure) and the Bellrock Onshore Transmission Development Area (OnTDA) (covering the Onshore Transmission Infrastructure) will be submitted by the Applicant in due course. Details on the different development areas that make up the Bellrock Project are provided in **Chapter 1: Introduction (Volume II)**.

Consultee	Date/Document	Comment	How/Where Comment is Addressed
			It is necessary for part of the Bellrock OfTDA to overlap with the Bellrock WFDA, as the OfTDA includes offshore substations[2] and interconnector cables which will be located in the same geographical area as the Bellrock WFDA, but will be consented separately to the Wind Farm Infrastructure. Site selection and design for the Bellrock OfTDA and OnTDA is underway see **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** and the Bellrock OfTDA application documents will include an updated whole project assessment (**Section 5.12**) and CEA (**Section 5.13**).
MD-LOT	30 October 2023, Bellrock WFDA Scoping Workshop. Email Response 15 December 2023.	*Please confirm guidance to be followed for MPA Assessment – is the 'Nature Conservation Marine Protected Areas: Draft Management Handbook' in the process of being updated?* Regarding the draft MPA handbook, this was only published as a draft a number of years ago and has not been adopted. MD-LOT therefore suggest that this is used as guidance and would suggest contacting NatureScot to understand the approach to be adopted. There are no plans to update the MPA handbook. MD-LOT understands that a lot of relevant information is contained within the Conservation Advice Documents on the JNCC website for each MPA and via NatureScot SiteLink which may be referred to as guidance.	Details on the **Nature Conservation Marine Protected Area (ncMPA) Assessment** are provided in **Section 5.14.2** and in the **Bellrock WFDA Report to Inform ncMPA Assessment (Volume VII)**.
NatureScot	Email, 18 March 2024.	Connectivity to ncMPA's is determined if the proposed development has the potential to impact the qualifying feature within the ncMPA boundary only.	Noted. Only sites/qualifying features that have the potential to be affected by impacts within the boundary of the ncMPA are screened in. See further detail in **Section 5.14.2** and in the **Report to Inform ncMPA Assessment (Volume VII)**.

[2] Offshore substations will be consented as part of the OfTDA and will be assessed as part of the Bellrock OfTDA EIA Report. The OfTDA is also considered within the Bellrock WFDA EIA's cumulative effects assessments

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MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The EIA Report must be in accordance with the EIA Regulations and the Scottish Ministers draw your attention in particular to, regulation 5 of the 2017 EW Regulations and regulation 12 of the 2007 MW Regulations. In accordance with the EIA Regulations, the Scottish Ministers advise that the EIA Report must be based on this Scoping Opinion."	The EIA Report is compliant with the EIA Regulations and the Scoping Opinion.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The Scottish Ministers note the need to carry out an assessment under the Conservation of Offshore Marine Habitats and Species Regulations 2017. This assessment must be coordinated with the EIA in accordance with the EIA Regulations.	In accordance with the Habitats Regulations (see **Section 5.14.1**), the Applicant has undertaken the relevant assessments to inform an appropriate assessment undertaken by the Scottish Ministers, as Competent Authority. The **Bellrock WFDA Shadow HRA (Volume VI)** has been submitted alongside this Bellrock WFDA EIA Report and application documentation for the Bellrock WFDA.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The EIA Regulations contain provisions regulating the assessment of environmental impacts. A multi-stage consent process arises where an approval procedure comprises more than one stage; one stage involving a principal decision and one or more other stages involving implementing decision(s) within the parameters set by the principal decision. While the effects which works may have on the environment must be identified and assessed at the time of the procedure relating to the principal decision, if those effects are not identified or identifiable at the time of the principle decision, assessment must be undertaken at the subsequent stage."	As discussed in **Sections 5.12** and **5.13**, as the site selection processes for the Bellrock OfTDA and OnTDA remain ongoing, it has not been possible for the Applicant to seek consent for the Bellrock Offshore and Onshore Transmission Infrastructure simultaneously with the Bellrock Wind Farm Infrastructure. Notwithstanding this, this Bellrock WFDA EIA Report considers the relationship and interactions between the Bellrock Wind Farm Infrastructure and those other components of the Bellrock Project. For the socioeconomics and greenhouse gas assessments, it has been possible for the Applicant to identify at this stage the likely significant effects of the Bellrock Project as a whole. For other receptors, sufficient worst-case information concerning the design envelope for the proposed Bellrock OfTDA and Bellrock OnTDA has been included in this Bellrock WFDA EIA Report (see **Chapter 4: Project Description (Volume II)**) to understand the potential cumulative effects of the Bellrock Wind Farm Infrastructure together with the Bellrock Offshore and Onshore Transmission Infrastructure. These effects are assessed as part of the CEA undertaken throughout this Bellrock WFDA EIA Report.

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			Further assessment of the effects of the Bellrock Project as a whole will be included within the Bellrock OfTDA EIA Report and OnTDA Report, which will include updated assessments of cumulative environmental impacts of the different components of the Bellrock Project. This approach is consistent with the relevant EIA Regulations, which make express provision for a multi-stage consent process, including in circumstances in which the likely significant effects of a project are not fully identifiable at the point at which an application for consent is determined. This multi-stage consent process allows for the potential effects of a project with different component parts to be assessed and considered as further information and detail becomes available.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The definition in the 2017 EW Regulations is as follows: "application for multi- stage consent" means an application for approval, consent or agreement required by a condition included in a regulatory approval where (in terms of the condition) that approval, consent or agreement must be obtained from the Scottish Ministers before all or part of the development permitted by the Electricity Act consent may be begun".	Noted.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	A Section 36 consent or marine licence, if granted, by the Scottish Ministers for the Proposed Development, may have several conditions attached requiring approvals etc. which fall under this definition, for example the approval of a CMS. When making an application for multi-stage consent the Developer must satisfy the Scottish Ministers that no significant effects have been identified in addition to those already assessed in the EIA Report.	Noted.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	If during the consideration of information provided in support of an application for multi-stage consent the Scottish Ministers consider that the Proposed Development may have significant environmental effects which have not previously been identified in the EIA Report (perhaps due to revised construction methods or updated survey information), then information on such effects and their impacts will be required. This information will fall to be dealt with as additional information under the EIA Regulations, and procedures for consultation, public participation, public notice and decision notice of additional information will apply.	Noted.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	In examining the EIA Report, and any other environmental information, the Scottish Ministers will seek to reach an up to date reasoned conclusion on the significant effects on the environment from the Proposed Development. This reasoned conclusion will be considered as up to date if the Scottish Ministers are satisfied that current knowledge and methods of assessment have been taken account of. For the avoidance of doubt, this Scoping Opinion does not preclude the Scottish Ministers from requiring the Developer to submit additional information in connection with any EIA Report submitted with an application for consent under Section 36 (“s.36 Consent”) of The Electricity Act 1989 (“the 1989 Act”) and a Marine Licence under The Marine and Coastal Access Act 2009 (“the 2009 Act”).	Noted.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	In the event that the Developer does not submit application(s) for a s.36 consent under the 1989 Act and a Marine Licence under the 2009 Act for the Proposed Development within 12 months of the date of this Scoping Opinion, the Scottish Ministers strongly recommend that the Developer seeks further advice from them regarding the validity of the Scoping Opinion.	Advice was sought from MD-LOT (12 August 2025). In line with the advice, the Applicant has undertaken ongoing consultation with stakeholders in the preparation of the EIA. The Applicant has undertaken a review of available data sources, proposed methodologies and has also actively monitored Scoping Opinions and EIA Representations for other ScotWind and INTOG offshore wind projects as they are published, to take account of matters raised by stakeholders which may be of relevance to the Bellrock WFDA.It is noted that reference to the 12 month period no longer included within MD-LOT’s online guidance and is therefore no longer applicable (Scottish Government, 2025).

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MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The Scottish Ministers advise that as more than one set of environmental impact assessment regulations apply the most stringent requirements must be adhered to in terms of, for example, consultation timelines and public notice requirements.	The Applicant confirms that all requirements under the relevant EIA Regulations[3] have been met.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The Scottish Ministers note that the Scoping Report only describes the wind farm development area components of the Proposed Development and that the Developer seeks to obtain separate Scoping Opinions from Aberdeenshire Council, for the associated onshore transmission infrastructure, and MD-LOT, for the associated offshore transmission works, at a later date. It is therefore essential that sufficient information concerning proposed offshore export cable works and onshore works is included in the EIA Report to understand the cumulative impacts of the Proposed Development. This will ensure that as much information as possible relating to the project as a 'whole' is presented.	**Sections 5.12** and **5.13** refer to the approach to the whole project assessment and CEA, which considers and assesses the Bellrock WFDA alongside the Bellrock OfTDA and OnTDA.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The Scottish Ministers direct the Developer to the NatureScot representation on the need to understand potential impacts holistically at a wider ecosystem scale, rather than just as discrete individual receptor assessments. The Scottish Ministers therefore advise that potential impacts should be given consideration across key trophic levels, particularly in relation to the availability of prey species. Detailed advice on assessment of across trophic levels is provided in the receptor chapters in Section 5 of the Scoping Opinion.	Inter-related effects (**Section 5.11**) refer to the inter-relationships between EIA topics and interactions between impacts which may lead to different or greater environmental effects than if considered solely in isolation, and presents an understanding of potential impacts holistically at a wider ecosystem scale. Inter-related effects are considered in each technical chapter (**Chapters 6 to 19 (Volume II)**). Additionally, prey relationships/target species are considered in the assessment in the following chapters in **Volume II**: ▪ **Chapter 8: Fish and Shellfish Ecology;** ▪ **Chapter 9: Marine Mammals;** ▪ **Chapter 10: Offshore Ornithology;** and ▪ **Chapter 11: Commercial Fisheries.**

[3] Electricity Works (environmental impact assessment) (Scotland) Regulations 2017 and Marine Works (environmental impact assessment) Regulations 2007.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The Plan assessed a potential maximum realistic development for the E1 site of up to 3 GW of export capacity. The Scottish Ministers note that the Developer is targeting a capacity of 1.2 GW for the Proposed Development (alongside the additional capacity proposed by other E1 site developers, totalling over 4 GW). The Scottish Ministers are undertaking a reassessment of the Plan, this may identify further impacts and mitigation given the increased capacity proposed at the E1 site in addition to the wider potential for increased cumulative impacts given the scale of lease option agreements awarded through the ScotWind leasing round. The outcome of this re-assessment and updated Plan will be relevant to decision making.	The capacity of the Bellrock Project has increased from 1.2 to 1.8 GW. See **Chapter 3: Site Selection and Consideration of Alternatives** (**Volume II)** for changes to the scope of the Bellrock Wind farm Infrastructure. At the time of writing, the updated version of the Sectoral Marine Plan (SMP) has not been published. Therefore, the updated project parameters and therefore the technical assessments within this Bellrock WFDA EIA Report (**Chapters 6 – 19 (Volume II)**) are based on the available SMP (Scottish Government, 2020).
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	Matters are not scoped out unless specifically addressed and justified by the Developer and confirmed as being scoped out by the Scottish Ministers. The matters scoped out should be documented and an appropriate justification noted in the EIA report.	Noted. Each technical chapter of this Bellrock WFDA EIA Report (**Chapters 6 – 19 (Volume II)**) sets out which impacts are scoped in and out in line with the Bellrock WFDA Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**).
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The Developer has committed to several mitigation plans, including but not limited to a Vessel Management Plan, Fisheries Management and Mitigation Strategy, a Marine Pollution Contingency Plan and a Marine Mammal Mitigation Protocol. A Mitigation Register, as Appendix 3 to the Scoping Report, summarises the mitigation and monitoring commitments for each receptor. Any embedded mitigation relied upon for the purposes of the assessment should be clearly and accurately explained in detail within the EIA Report. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The EIA Report must identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.	See **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** for details on mitigation and mitigation plans, and how these are considered in this Bellrock WFDA EIA Report. The avoidance of impacts to key receptors has been considered as Primary Mitigation in the form of design changes as part of the iterative design process (see **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)**. Each technical chapter of this Bellrock WFDA EIA Report (**Chapters 6 to 19 (Volume II)** sets out the relevant mitigation measures and detail on how these are applied/implemented. See **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** for a full list of mitigation commitments.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The EIA Report should clearly demonstrate how the Developer has had regard to the mitigation hierarchy, including giving consideration to the avoidance of key receptors. The Scottish Ministers advise that where the mitigation is envisaged to form part of a management or mitigation plan, the EIA Report must set out these plans or the reliance on these in sufficient detail so the significance of the residual effect can be assessed and evaluated. This should also include identification of any monitoring and remedial actions (if relevant) in the event that predicted residual effects differ to actual monitored outcomes. Commitment to develop plans without sufficient detail is not considered to be suitable mitigation in itself.	See **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** for details on mitigation and mitigation plans, and how these are considered in this Bellrock WFDA EIA Report. Each technical chapter of this Bellrock WFDA EIA Report (**Chapters 6 to 19 (Volume II)**) sets out the relevant mitigation measures and detail on how these are applied/implemented. The following plans are provided alongside this Bellrock WFDA EIA Report: ▪ Fisheries Mitigation, Monitoring and Communication Plan (FMMCP); ▪ Written Scheme of Investigation (WSI), including a Protocol for Archaeological Discoveries (PAD); ▪ Marine Pollution and Contingency Plan (MPCP); and ▪ Invasive Non-native Species Management Plan (INNSMP). The following outline plans are also provided: ▪ Outline Marine Mammal Mitigation Protocol (MMMP); ▪ Outline Vessel Management and Navigational Safety Plan (VMNSP); ▪ Outline Lighting and Marking Plan (LMP); and ▪ Outline Environmental Management Plan (EMP). See **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)**.
MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	The EIA Report must include a table of mitigation which corresponds with the mitigation identified and discussed within the various chapters of the EIA Report and accounts for the representations and advice attached in Appendix I.	See **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)**.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024a).	Where potential impact on the environment have been fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by detailing in the EIA Report, the work that has been undertaken, the results, what impact, if any, has been identified and why it is not significant.	Noted. Where potential impacts with little or no significance are identified in the technical chapters of this Bellrock WFDA EIA Report (**Chapters 6 to 19 (Volume II)**), this approach is applied.
Aberdeen City Council	Representation on the Bellrock WFDA Scoping Report (2024).	However, it is noted that the extent of the proposed works does not include the export cable or onshore elements of the project, which are intrinsic components of it. Thus, the competency of the assessment process in terms of the requirements of EIA and HRA assessment is considered to be questionable.	As discussed in **Sections 5.12** and **5.13**, as the site selection processes for the Bellrock OfTDA and OnTDA remain ongoing, it has not been possible for the Applicant to seek consent for the Bellrock Offshore and Onshore Transmission Infrastructure simultaneously with the Bellrock Wind Farm Infrastructure. Notwithstanding this, this Bellrock WFDA EIA Report considers the relationship and interactions between the Bellrock Wind Farm Infrastructure and those other components of the Bellrock Project. For the socioeconomics and greenhouse gas assessments, it has been possible for the Applicant to identify at this stage the likely significant effects of the Bellrock Project as a whole. For other receptors, sufficient worst-case information concerning the design envelope for the proposed Bellrock OfTDA and Bellrock OnTDA has been included in this Bellrock WFDA EIA Report (see **Chapter 4: Project Description (Volume II)**) to understand the potential cumulative effects of the Bellrock Wind Farm Infrastructure together with the Bellrock Offshore and Onshore Transmission Infrastructure. These effects are assessed as part of the CEA undertaken throughout this Bellrock WFDA EIA Report. Further assessment of the effects of the Bellrock Project as a whole will be included within the Bellrock OfTDA EIA Report and OnTDA Report, which will include updated assessments of cumulative environmental impacts of the different components of the Bellrock Project. This approach is consistent with the relevant EIA Regulations, which make express provision for a multi-stage consent process, including in circumstances in which the likely significant effects of a project are not fully identifiable

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			at the point at which an application for consent is determined. This multi-stage consent process allows for the potential effects of a project with different component parts to be assessed and considered as further information and detail becomes available.
Natural England	Representation on the Bellrock WFDA Scoping Report (2024).	Please find our generic EIA advice in annex A.	Noted. Natural England's generic EIA advice has been considered in the preparation of this Bellrock WFDA EIA Report.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	As noted in Section 3.9, the Bellrock project is at an early stage of development with project timelines provided as being indicative. Paragraph 184 states that construction works for the Bellrock WFDA may start up to seven years after consent (if awarded) and that further details will be provided in the EIA Report. We highlight that within that seven-year timeframe further relevant information is likely to emerge from post-consent monitoring and/or data associated with both offshore wind farms and climate change. It is not clear how this will be accounted for, given such a lengthy gap.	Commencement of construction is scheduled to occur in 2031, around 4 years after the WFDA consents are awarded (as presented in **Chapter 4: Project Description (Volume II)**). The Bellrock WFDA EIA Report takes account of the latest information available. Where new information relating to the potential impact of the Wind Farm Infrastructure becomes available prior to the commencement of construction, this information will be considered, as appropriate. It is noted that whilst commencement of construction is expected to occur within five years of consent being granted, a seven years. 36 Consent validity date is being sought to provide necessary flexibility in light of uncertainties over the Contract for Difference process and supply chain capacity.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	Plate 1.1, on page 3 of the Scoping Report, illustrates the three elements summarised above (the WFDA, OfTDA and SSEN Transmission offshore substations). This is the first occasion that we have been consulted on an Offshore Wind Farm with such interrelated dependencies. As such, it would be helpful to further discuss the proposed consent strategy and how this is to be managed going forward with MD-LOT. Including, confirmation as to whether the separate consent applications for the WFDA and OfTDA will be submitted at the same time and with one or multiple EIA Reports.	NESO confirmed in April 2025 that the Bellrock Project's approved grid connection design is a connection to the National Electricity Transmission System at the SSEN Transmission proposed Hurlie substation (onshore). Therefore, the previously recommended connection (to an SSEN Transmission offshore substation) is no longer relevant. Due to the timing of this NESO decision, it is necessary to proceed with separate consents for the Bellrock WFDA and the Bellrock OfTDA, which will be submitted at different times. A standalone whole project assessment is included in this Bellrock WFDA EIA Report for socioeconomics and greenhouse gas (see **Section 5.12**), and all other receptors consider the Bellrock OfTDA and OnTDA as part of the CEA (see **Section 5.13**).

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NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	The EIA Report should consider the impact of all phases of the proposed development on the receiving environment, including effects from pre-construction activities as well as the construction, operation and maintenance and decommissioning phases. We recommend that the following aspects are considered further and included in the EIA Report.	Noted. Each technical chapter of this Bellrock WFDA EIA Report (**Chapters 6 to 19 (Volume II)**) considers the impact of all phases of the Bellrock Wind Farm Infrastructure.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	Increasingly, there is a need to understand potential impacts holistically at a wider ecosystem scale in addition to the standard set of discrete individual receptor assessments. This assessment should focus on potential impacts across predator prey interactions. This will enable a better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance from the development of the wind farm on bird and mammal (and other top predator) interests and what influence this may have on population level impacts. We recognise that the role of biological receptors in ecosystem function is noted in paragraph 281 of Section 4.5.3.2, which sets out the approach to determining receptor sensitivity and value.	Inter-related effects (**Section 5.11**) refer to the inter-relationships between EIA topics and interactions between impacts which may lead to different or greater environmental effects than if considered solely in isolation, and presents an understanding potential impacts holistically at a wider ecosystem scale. Inter-related effects are considered in each technical chapter (**Chapters 6 to 19 (Volume II)**). Additionally, prey relationships/target species are considered in the assessment in the following chapters in **Volume II**: ▪ **Chapter 8: Fish and Shellfish Ecology;** ▪ **Chapter 9: Marine Mammals;** ▪ **Chapter 10: Offshore Ornithology;** and ▪ **Chapter 11: Commercial Fisheries.**
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	Section 3.9.3.1 outlines the process for FSS construction and refers to wet storage and temporary mooring of fixed substructures and/or floating offshore units. It is noted that ports and wet storage locations are yet to be confirmed. Within Section 3.9.3.1 it is also stated that temporary mooring and/or wet storage will be undertaken under consents and Marine Licences as required of the relevant ports/storage locations. Furthermore, in Section 4.6.1 it is stated that earlier manufacturing activities, port activities and wet storage of FOUs do not form part of the Bellrock WFDA or activities for which consent is sought. It is however noted that wet storage of floating units will be considered within the CEA. We are aware that Marine Directorate are currently considering consenting	The temporary mooring of FSSs and/or FOUs at dedicated locations (known as 'wet storage') for the Bellrock Project will be considered through separate consenting process(es) as required. The Applicant is not seeking consent for wet storage within this application, and it has not been included within the scope of this EIA Report. Any proposed projects in the public domain for wet storage facilities on the east coast of Scotland have been considered within the cumulative assessment along with other projects and plans (**Appendix 5.3: CEA Long List of Projects (Volume IV)**). Therefore, wet storage of FSSs has been considered within the CEA section (where sufficient information allows) along with

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		routes and processes for wet storage. We would welcome further discussion on this, as and when further details are available, to help inform our advice going forward.	other projects and plans in line with the methodology outlined in **Section 5.13**. The greenhouse gas assessment, which considers embodied carbon and related emissions from the manufacture and production of materials used in for the Bellrock Wind Farm Infrastructure.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	We note that there are aspects associated with the Bellrock Project that are not within the WFDA, and therefore not considered in detail within the WFDA Scoping Report but are relevant to the CEA. As noted in Section 4.6, a two stage CEA is proposed which will firstly consider the whole Bellrock Project (WFDA and OfTDA collectively) and then secondly the whole Bellrock Project alongside other plans or projects (including the SSEN Transmission offshore substation). We have previously raised the need for strategic consideration by both Scottish Government (Offshore Wind and Marine Directorates) and the Electricity System Operator (ESO) for the consideration of interconnector management in Scottish waters to avoid marine and coastal spatial squeeze.	NESO confirmed in April 2025 that the Bellrock Project's approved grid connection design is a connection to the National Electricity Transmission System at the proposed SSEN Transmission Hurlie substation (onshore). Therefore, the site selection process for the Bellrock OfTDA and OnTDA remain ongoing. **Sections 5.12** and **5.13** refer to the approach to the whole project assessment and CEA, which considers the Bellrock Wind Farm Infrastructure alongside the Bellrock Offshore Transmission Infrastructure and Onshore Transmission Infrastructure.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	We welcome the identification of "embedded mitigation measures" described as outlined in Section 4.5.3.5 as well as in each of the relevant receptor chapters of the EIA Scoping Report and summarised in Appendix 3 - Mitigation Register. However, much of the embedded mitigation detailed throughout includes the development and adherence to post-consent plans/programmes. Plans do not strictly constitute mitigation – it is the measures contained within the plan that will mitigate impacts. The EIA Report must clearly articulate those mitigation measures that are informed by the EIA (or HRA) and are necessary to avoid or reduce predicted significant adverse environmental effects of the proposed development – described as secondary mitigation in paragraph 290 of Section 4.5.3.5. We advise that the full range of mitigation and monitoring measures,	See **Appendix 5.1: Mitigation and Monitoring Register (Volume IV) Section 5.1** for details on mitigation and mitigation plans, and how these are considered in this Bellrock WFDA EIA Report. Each technical chapter of this Bellrock WFDA EIA Report (**Chapters 6 to 19 (Volume II)**) sets out the relevant mitigation measures and detail on how these are applied/implemented. The following plans are provided alongside this Bellrock WFDA EIA Report: ▪ FMMCP; ▪ WSI, including a PAD; ▪ MPCP; and

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		and published guidance, are considered and discussed in the EIA Report.	▪ INNSMP. Please see **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)**.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	The Bellrock WFDA EIA Report provides the assessment to support the application and should be suitability structured, with appropriate formatting, sufficient information with limited repetition to ensure it can be reviewed efficiently and effectively. Consideration should therefore be given to the following aspects: ▪ It should clearly follow the direction provided in the Scoping Opinion, or where specific agreement was later reached during the pre-application process. Any divergence from this needs to be laid out separately and must be fully justified. Consideration should be given to the volume and flow of information within and across each receptor chapter and associated technical appendices. The flow of information relating to impact pathway, assessment and conclusions should be concise but not omit key information on steps taken. Repeated duplication of text should be avoided through appropriate structuring. ▪ In electronic versions of the Bellrock WFDA EIA Report, navigational aids including use of hyperlinks etc. are required, particularly where there are supporting technical appendices to any chapters. ▪ Each stage of the assessment process should be sufficiently transparent to allow the assessments to be repeated. Where specific tools have been used, details of which version and when the assessment was carried out is required.	This Bellrock WFDA EIA Report follows the Scoping Opinion for the Bellrock WFDA. Navigational aids including hyperlinks and cross-referencing has been utilised where possible. Each chapter follows the direction provided in the Scoping Opinion and the methodology laid out in this Chapter unless otherwise stated. Each stage of the assessment process is clearly explained in the relevant technical chapters (**Chapters 6 to 19 (Volume II)**).
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	We recommend early consideration of potential Positive Effects for Biodiversity as well as nature inclusive design aspects at an early stage and following through into the Bellrock WFDA EIA Report. We acknowledge that, whilst not policy in the marine environment, these aspects form part of our ability to address	During the detailed design of the Bellrock Wind Farm Infrastructure, consideration will be given to opportunities to apply Nature Inclusive Design to the Project to contribute to biodiversity enhancement and nature positive outcomes, in line

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		both the climate and biodiversity crises and as such we encourage developers to consider this as part of their application.	with available guidance at the time (see **Chapter 4: Project Description (Volume II)** for details).
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	Following the Bellrock Scoping workshop NatureScot provided written advice on SLVIA (advice issued 20 December 2023). NatureScot advised that due to the location of the proposal, the distance to shore, as well as the advice that they provided during the Sectoral Marine Plan consultation, SLVIA for the offshore elements located within the array area is not required and can be scoped out of the assessment. The exception to this would be if there was any planned infrastructure outside the array area that may be visible from shore – if this is the case then NatureScot advise further consultation.	Noted.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024).	NatureScot note that in Section 15.4.1 it is stated that "there is no permanent above-water infrastructure outside of the Bellrock WFDA which forms part of the Bellrock WFDA that would require separate consideration". NatureScot are therefore content that their previous advice remains valid.	Noted.
NatureScot	Email, 7th February 2025.	NatureScot are content that the North East/Eastern Ornithology Group led cumulative work packages are used by Bellrock to inform cumulative/in-combination assessments should the Scottish Government-led Cumulative Effects Framework (CEF) tool not be available. We expect these packages, if used, to be included in the Bellrock WFDA EIA Report as appendices.	Noted. The NEEOG led cumulative work package has been used to inform cumulative/in-combination assessments for ornithology, therefore the ornithology CEA screening uses the NEEOG Interim CEF project, using the most recently update available, being April 2025. Details on the approach to cumulative assessment for ornithology receptors is provided in **Chapter 10: Offshore Ornithology (Volume II)**. The approach to CEA for marine mammals is set out in **Chapter 9: Marine Mammals (Volume II)**.
Aberdeenshire Council	Email from Aberdeenshire Council	Aberdeenshire Council confirm agreement with the proposed GHG and CCR assessment methodology.	The agreed methodology has been used to undertake the GHG and Climate Change Risk (CCR)[1] assessments (see **Section**

Consultee	Date/Document	Comment	How/Where Comment is Addressed
	to the Applicant (sent 28 July 2025).		**5.12** and **Chapter 17: Greenhouse Gas Assessment (Volume II)**).
Aberdeenshire Council	Email from Aberdeenshire Council to the Applicant (sent 28 July 2025).	Aberdeenshire Council confirm agreement with the proposed socioeconomics methodology.	The agreed methodology has been used to undertake the socioeconomics assessments (see **Section 5.12** and **Chapter 16: Socioeconomics, Tourism and Recreation (Volume II)**).
MD-LOT	Email from MD-LOT to the Applicant (sent 1 August 2025).	MD-LOT advised that they have no further comment to provide on the greenhouse gas and climate change resilience assessment methodology and would direct the Applicant to the advice contained in MD-LOT's Scoping Opinion of 8 August 2024.	The methodology used to undertake the GHG and CCR[1] assessments is discussed in **Section 5.12** and **Chapter 17: Greenhouse Gas Assessment (Volume II).**
MD-LOT	Email from MD-LOT to the Applicant (sent 22 August 2025).	MD-LOT forwarded the letter [*regarding proposed methodology for socioeconomics, tourism and recreation assessment*] to MD-MAU, which has confirmed a nil response as it does not provide advice post-scoping.	The methodology used to undertake the socioeconomics assessments is discussed in **Section 5.12** and **Chapter 16: Socioeconomics, Tourism and Recreation (Volume II)**.
MD-LOT	Email from the Applicant to MD-LOT & NS regarding quarterly meeting minutes agreements (13 June 2025).	The Applicant confirmed that consents plans for the WFDAs and OfTDA will be separate plans, rather than having overall offshore plans.	Consent plans are discussed in **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)**.
MD-LOT	Email from MD-LOT to the Applicant (sent 19 December 2024).	MD-LOT advise that they do not have a preference on the EIA report structure and have no concerns with the structure set out in the e-mail, as long as Bellrock presents all the information clearly to allow easy navigation of the EIA Report and any embedded links work correctly.	This Bellrock WFDA EIA Report follows the Scoping Opinion for the Bellrock WFDA. Navigational aids including hyperlinks and cross-referencing has been utilised where possible. Each chapter follows the methodology laid out in this Chapter unless otherwise stated. Each stage of the assessment process is clearly explained in the relevant technical chapters (**Chapters 6 to 19 (Volume II)**).

Consultee	Date/Document	Comment	How/Where Comment is Addressed
MD-LOT	Email from MD-LOT to the Applicant (12 August 2025).	MD-LOT would advise that the Applicant may wish to consider re-scoping the proposed project in light of the updated design parameters and highlight that not re-scoping the proposed project, could result in a greater risk of the potential requirement for additional information following consultation on the application and thus resulting in a longer timeframe for determination. Should the Applicant not wish to re-scope and proceed to application stage, then MD-LOT would advise that where any deviation from the scoping opinion is made, the Applicant must ensure that this is reflected clearly within the EIA Report and GAP analysis to be submitted alongside the application. MD-LOT also advised that it is the responsibility of the Applicant to ensure that the advice and information provided in the issued scoping opinion remains valid and appropriate in the context of the project and continues to inform the EIA Report. MD-LOT also encouraged the Applicant to engage with relevant stakeholders to determine whether any updated guidance or new material considerations have emerged since the scoping opinion was issued, and to reflect this as appropriate in the EIA Report	The Applicant has consulted directly (by letter, see Pre Application Consultation Report, **Appendix 5.2: Pre-application Consultation Report (Volume IV)** with all stakeholders who received the Scoping Report from MD-LOT and additional stakeholders identified by the Applicant, regarding updates to the Bellrock Wind Farm Infrastructure made post scoping. This provided stakeholders with an update on the Bellrock Project, the EIA methodologies to be used, and confirmation that and an opportunity to provide feedback directly to the project team. Stakeholders were also invited to a future virtual consultation event (**Section 5.4**). The letter presented the increase in export capacity (to 1.8 GW), and how this is considered within the EIA, to demonstrate the validity of the Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**) and Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**) and to determine if new guidance or information has emerged since the Scoping Report was submitted and Scopinig Opinion was received. The Applicant has undertaken ongoing consultation with key stakeholders (including MD-LOT, NatureScot, Aberdeenshire Council, Maritime Coastguard Agency (MCA), Northern Lighthouse Board (NLB), and fishers) regarding the increase to 1.8 GW and how this considered within the EIA. No new impacts have been identified by stakeholders as a result of increase in number of WTGs. This is reflected in the impact assessments where no new impact pathways were identified. The EIA has not deviated from the advice provided within the Scoping Opinion, apart from where further advice has been provided or where it has been determined, following assessment undertaken in preparation of the Bellrock WIA Report, that a pathway for a likely significant effect does not in fact exist, and this has been presented clearly within the EIA Report. The Applicant has also actively monitored Scoping Opinions and EIA Representations for other ScotWind and INTOG projects as they are published, to take account of matters raised by stakeholders which may be of relevance to the Bellrock WFDA

Consultee	Date/Document	Comment	How/Where Comment is Addressed
			as necessary, to manage the longer timeframe between scoping and Application. The Applicant considers the existing Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**) remains valid and, along with additional consultation undertaken, continues to be a reasonable and appropriate basis for the assessments undertaken in this Bellrock WFDA EIA Report.
Notes: [1] A whole project assessment is not required for the CCR assessment (**Chapter 18: Climate Change Risk (Volume II)**).			

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5.5 Environmental Impact Assessment Legislation, Policy and Guidance

27. This Bellrock WFDA EIA Report is undertaken in line with the relevant EIA regulations:

- Electricity Works (environmental impact assessment) (Scotland) Regulations 2017; and
- Marine Works (environmental impact assessment) Regulations 2007.

28. Further details on the compliance of the Bellrock Wind Farm Infrastructure with legislative requirements are provided in **Chapter 2: Policy and Legislative Context (Volume II)**.

29. The assessment of potential effects in this Bellrock WFDA EIA Report uses the standard guidance detailed below to assist with the production of a robust and proportionate EIA, in particular:

- MD-LOT (2024b). Marine environment: licensing and consenting requirements;
- MD-LOT (2025). Mitigation and monitoring plans;
- Scottish Government (2023). National Planning Framework 4 (NPF4);
- Scottish Government (2022). Electricity Act 1989 - s.36 Consent Applications: Guidance for Applicants on Using the Design Envelope;
- Scottish Government (2017a). Planning Circular 1/2017: environmental impact assessment Regulations;
- Scottish Government (2013). Planning Advice Note 1/2013 environmental impact assessment;
- Scottish National Heritage (SNH) (2018). A Handbook on environmental impact assessment;
- Chartered Institute for Ecology and Environmental Management (CIEEM, 2018). Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine;
- Institute of Environmental Management and Assessment (IEMA) (2024). IEMA Guidance: Implementing the Mitigation Hierarchy from Concept to Construction;
- IEMA (2017). Delivering Proportionate EIA. A Collaborative Strategy for Enhancing UK EIA Practice;
- IEMA (2015). IEMA environmental impact assessment Guide to Shaping Quality Development;
- Centre for Environment, Fisheries and Aquaculture (Cefas) (2012). Guidelines for data acquisition to support marine environmental assessments of offshore renewable energy projects;
- Cefas (2004). Offshore Wind Farms: Guidance Note for EIA in Respect of Food and Environmental Protection Act and Coast Protection Act Requirements;

- RenewableUK (2013). Guiding Principles for Cumulative Impacts Assessment in Offshore Wind Farms;
- OSPAR (Convention for the Protection of the Marine Environment of the Northeast Atlantic) (2009). Assessment of the Environmental Impacts of Cables;
- European Commission (2017). EIA of Projects – Guidance on the preparation of the environmental impact assessmentReport. (Office for Official Publications of the European Communities 2017);
- European Commission (1999). Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions;
- Maclean et al. (2009). A Review of Assessment Methodologies for Offshore Windfarms (OWFs) (Collaborative Offshore Wind Research into The Environment (COWRIE) METH-08-08); and
- Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice on CEA.

30. Each technical chapter (**Chapters 6 to 19 (Volume II)**) also refers to chapter-specific guidance used to undertake their assessments.

31. Any legislation referred to in this EIA Report is as subsequently amended and as currently in force as at the date of this EIA Report.

32. Legislation, policy and guidance changes since the submission of the Bellrock WFDA Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**) has been considered and reflected in this Bellrock WFDA EIA Report, where such changes have been issued with adequate time for the assessment to be undertaken and finalised prior to the submission date.

5.6 Design Evolution Process

33. The EIA process allows opportunities for environmental concerns to be addressed within the design of the Bellrock Wind Farm Infrastructure. Typically, a number of design iterations take place prior to the final design being submitted for approval to account for environmental constraints and engagement comments received. This iterative design process is a fundamental element of the EIA.

34. The iterative design process integrates the advice and experience of the environmental receptor experts that undertake the scoping and impact assessments for the Bellrock WFDA EIA Report in regular liaison with the Applicant's team. This ensures that design evolution is informed by a project-wide understanding of environmental sensitivities such that the mitigation hierarchy, including consideration of the avoidance of key receptors, is adhered to throughout the development of the Bellrock Wind Farm Infrastructure and the wider Bellrock Project.

35. Environmental and social considerations have been central to the design decisions made and evolution of the Bellrock Wind Farm Infrastructure to date, as informed by a combination of stakeholder engagement, EIA surveys and technical studies. The design evolution process

undertaken to date, including refinements in the project design since scoping, is evidenced in **Chapter 4: Project Description (Volume II)** and **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)**.

5.7 Design Envelope Approach

36. A parameter-based design envelope approach has been adopted for this Bellrock WFDA EIA Report. The design envelope sets out a minimum and maximum design scenario for each design parameter, which enables the identification of the worst-case assessment scenario for each impact assessed. The design envelope includes all relevant technical, spatial and temporal elements of the Bellrock Wind Farm Infrastructure, and the proposed methodology to be employed for construction, O&M, and decommissioning. These parameters enabled technical specialists to accurately assess the impacts of the Bellrock Wind Farm Infrastructure whilst retaining sufficient flexibility to accommodate further refinement during the detailed design stage once the Bellrock Wind Farm Infrastructure has been consented.

37. The design envelope approach allows the Bellrock Wind Farm Infrastructure to be assessed on a reasonable receptor-specific worst-case scenario basis. The reasonable worst-case scenario defined for any given parameter may vary by technical aspect, depending on how the parameter can be expected to interact with the receptor being considered. This is considered a standard approach and is widely accepted by stakeholders and regulators and is necessary to ensure the essential design flexibility at this early stage of project development.

38. The need for flexibility in the consent is a key aspect of any large development but is particularly significant for offshore wind farm projects where technology is evolving. The design envelope must provide sufficient flexibility to enable the Applicant and their supply chain to use the most up to date, efficient and economical technology and techniques in the construction, O&M, and decommissioning of the Bellrock Wind Farm Infrastructure, without affecting the surrounding environment to a greater extent than the worst-case scenarios assessed in the Bellrock WFDA EIA Report.

39. The information presented in **Chapter 4: Project Description (Volume II)** outlines the options and flexibility required by the Applicant and the range of potential design, location and activity parameters upon which this Bellrock WFDA EIA Report is based. The final detailed design will lie within the parameters of the design envelope described in this Bellrock WFDA EIA Report. Pre-construction detailed design work will be undertaken post-consent whilst retaining the validity of the Bellrock WFDA EIA Report. The guidance prepared by the Marine Directorate on offshore renewable energy project marine licensing and consenting includes advice on using the design envelope approach for applications under s.36 of the Electricity Act 1989 where flexibility is required in applications (Scottish Government, 2025).

40. Each chapter in the Bellrock WFDA EIA Report assesses a ‘realistic worst-case’ scenario for each of the identified potential impacts, as described in **Section 5.2**.

5.8 Assessment Scope

41. The scope of this Bellrock WFDA EIA Report complies with the legislative requirements set out in **Section 5.5** and in **Chapter 2: Policy and Legislative Context (Volume II)**. **Table 5.3** below sets out the specific scope requirements under the EIA Regulations, and details where these are addressed in this Bellrock WFDA EIA Report.

Table 5.3: Where Requirements of the EIA Regulations are Addressed in this Bellrock WFDA EIA Report

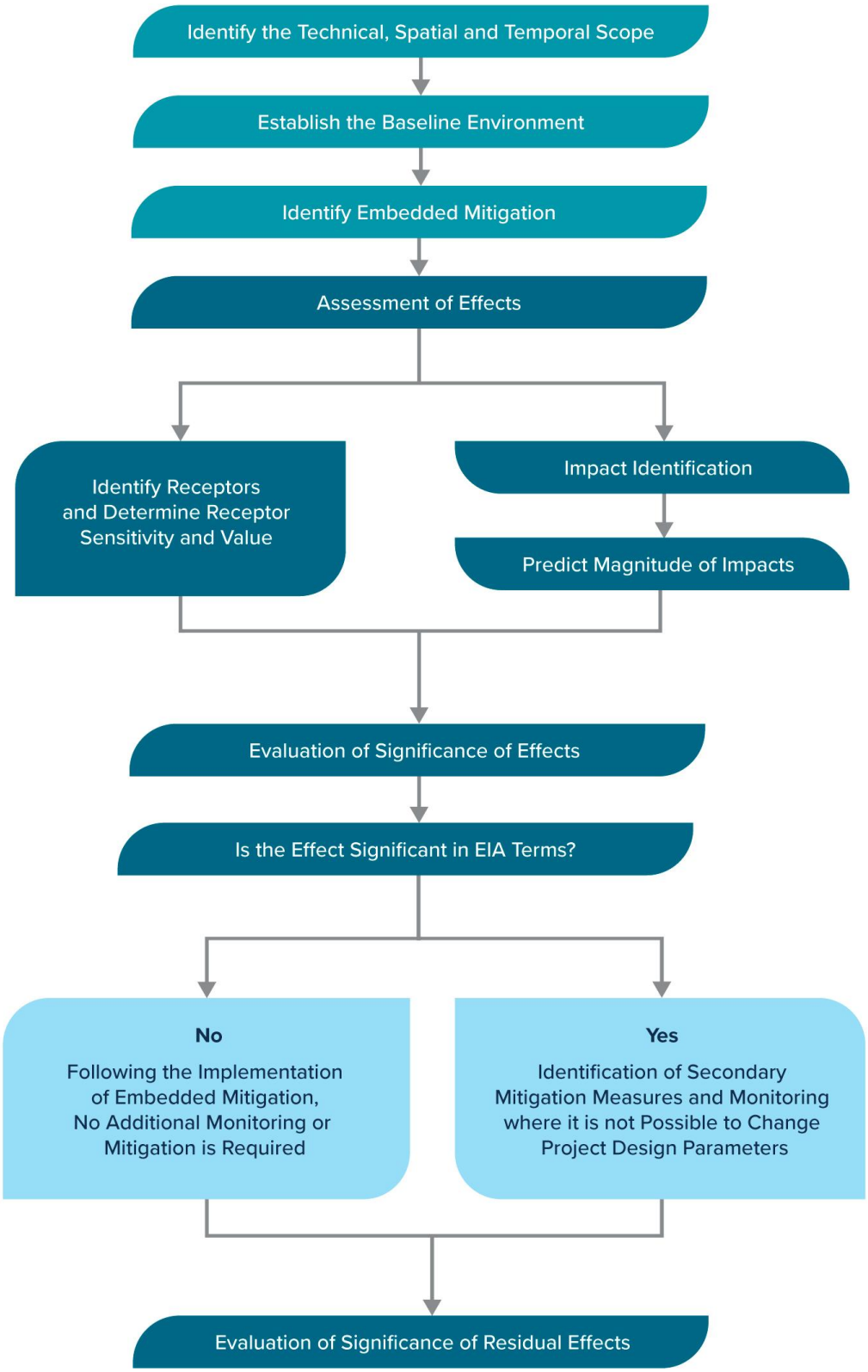
Requirement[1]	Date/Document
Population and human health	▪ Chapter 11: Commercial Fisheries (Volume II); ▪ Chapter 12: Shipping and Navigation (Volume II); ▪ Chapter 13: Aviation and Radar (Volume II); ▪ Chapter 14: Marine Infrastructure and Other Users (Volume II); ▪ Chapter 16: Socioeconomics, Tourism and Recreation (Volume II); ▪ Chapter 17: Greenhouse Gas Assessment (Volume II); and ▪ Chapter 19: Major Accidents and Disasters (Volume II).
Biodiversity, and in particular species and habitats protected under the Habitats Regulations	▪ Chapter 7: Benthic Ecology (Volume II); ▪ Chapter 8: Fish and Shellfish Ecology (Volume II); ▪ Chapter 9: Marine Mammals (Volume II); and ▪ Chapter 10: Offshore Ornithology (Volume II).
Land, soil, water, air and climate	▪ Chapter 6: Marine Geology, Oceanography and Physical Processes (Volume II); ▪ Chapter 7: Benthic Ecology (Volume II); ▪ Chapter 17: Greenhouse Gas Assessment (Volume II); and ▪ Chapter 18: Climate Change Risk (Volume II). *Please note that offshore air quality is scoped out (see **Section 14**).*
Material assets, cultural heritage and the landscape	▪ Chapter 13: Aviation and Radar; ▪ Chapter 14: Marine Infrastructure and Other Users; ▪ Chapter 15: Marine Archaeology and Cultural Heritage; and ▪ Chapter 16: Socioeconomics, Tourism and Recreation. *Please note that consideration of seascape, landscape and visual impacts are scoped out (see **Section 14**).*
The effects to be identified, described and assessed under paragraph (2) include the expected effects deriving from the vulnerability of the development to risks, so far as relevant to the development, of major accidents and disasters.	▪ Chapter 18: Climate Change Risk (Volume II); and ▪ Chapter 19: Major Accidents and Disasters (Volume II).
Notes: [1] As detailed in in Regulations 4(3) and 4(4) of the Electricity Works (environmental impact assessment) (Scotland) Regulations 2017. The Marine Works (environmental impact assessment) Regulations 2007 contain similar provisions and wording which is covered by the above.	

5.9 Environmental Impact Assessment Methodology

42. Within this Bellrock WFDA EIA Report, each technical chapter covers a separate environmental topic (**Chapters 6 to 19 (Volume II)**). Each technical chapter comprises the following:

- Identification of the study area/area of potential influence;
- A summary and description of chapter-specific relevant legislation, policy and guidance;
- A summary of relevant consultation, including feedback received in the Scoping Opinion;
- A characterisation of the baseline environment within the defined study area, with reference to the technical, spatial and temporal scope of the assessment **(Section 5.9.1)**;
- Identification of embedded mitigation measures (primary and tertiary measures) committed to by the Applicant;
- Description of the EIA process and methodology specific to the given chapter (as shown in **Plate 5.2**);
- Assessment of the likely significance of effect from impacts as a result of the Bellrock Wind Farm Infrastructure **(Section 5.9.2)**;
  - Identification of impacts (**Section 5.9.2.1**);
  - Definition of receptor sensitivity and value (**Section 5.9.2.25.9.2.2**);
  - Definition of the magnitude of impact (**Section 5.9.2.3**);
  - Determination of the significance of the effect (**Section 5.9.2.4**);
  - Description of the any additional mitigation measures proposed to prevent, reduce or offset effects (**Section 5.9.2.5**);
  - Consideration of any residual effects (**Section 5.9.2.6**);
- An assessment of any transboundary effects on European Economic Area (EEA) states, if applicable **(Section 5.10)**;
- An assessment of inter-related effects (both inter-relationships and interactions between technical chapters) **(Section 5.11)**; and
- An assessment of cumulative effects with the Bellrock Offshore Transmission Infrastructure and Onshore Transmission Infrastructure, as well as other plans, projects and activities, which, together with the Bellrock Wind Farm Infrastructure, may have a likely significant effect on a receptor **(Section 5.13)**.

Plate 5.2: Overview of EIA Methodology



5.9.1 Existing Environment

43. To assess the potential impacts of the Bellrock Wind Farm Infrastructure, it is necessary to determine the environmental conditions that currently exist within the Bellrock WFDA and in the wider study areas. These are known as the existing baseline conditions (existing environment).

44. The study area and approach which has been used to establish baseline conditions for each environmental receptor varies depending on the receptor and is set out within its respective technical chapter. Baseline conditions have been determined using desk-based data searches and the results of site-specific surveys and investigations (where available), or a combination of these, as appropriate.

45. The existing environment for each technical chapter is defined with reference to the following scopes:

- Technical scope;
- Spatial scope; and
- Temporal scope.

5.9.1.1 Technical Scope

46. The technical scope (impacts) is outlined in the respective chapters. Justification is provided for the individual approach and impacts to be considered in the assessment for each environmental receptor (in line with the Scoping Opinion (**Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**). The technical scope also details the approach to baseline data collection and assessment methodologies.

47. Data gaps and limitations with the data collected to inform the baseline are described in each technical chapter. The ability of any identified data gaps and limitations to materially influence the outcome of the EIA are noted and commented on, where relevant.

5.9.1.2 Spatial Scope

48. The spatial scope for each technical assessment depends on the nature of the potential effects and the location of receptors that could be affected by the construction, operation and decommissioning of the Bellrock Wind Farm Infrastructure. The study area relevant to each environmental receptor is described in each respective technical chapter where appropriate. The spatial scope of the technical assessments therefore takes account of:

- Relevant guidance;
- The physical area of the Bellrock WFDA;
- The nature of the baseline environment; and
- The manner and extent to which environmental effects may occur within the Bellrock WFDA or beyond its boundaries.

5.9.1.3 Temporal Scope

49. The temporal scope refers to the time periods over which impacts and effects may be experienced by sensitive receptors. This Bellrock WFDA EIA has assessed potential impacts and effects during the construction, O&M, and decommissioning phases of the Bellrock Wind Farm Infrastructure.

50. While there is potential for impacts from the physical presence of operational infrastructure, during the construction phase of the Bellrock Wind Farm Infrastructure, these impacts will increase incrementally as construction progresses, until the infrastructure is fully installed. The technical chapters of this Bellrock WFDA EIA Report do not consider these impacts in relation to the construction and decommissioning phases to avoid double counting of potential impacts, but such impacts are included under the O&M phase of the assessment, as appropriate. Impacts specific to construction and decommissioning phases are considered in construction and decommissioning phases as appropriate.

51. In each technical chapter, environmental effects are compared to the current environmental baseline and also take into consideration the projected future baseline (i.e. the theoretical situation that would exist in the absence of the Bellrock Wind Farm Infrastructure) where possible. For example, predictable changes such as climate change (assessed quantitatively in **Chapter 18: Climate Change Risk (Volume II)**) or changes that can be expected based on reasonable assumptions and modelling calculations, are considered. Each technical chapter of the Bellrock WFDA EIA Report defines the baseline (current and future where possible) against which the environmental effects of the Bellrock Wind Farm Infrastructure is assessed.

5.9.2 Assessment of Effects

52. This section sets out the framework methodology for the impact assessment with each technical chapter providing details of how the methodology has been applied for that receptor. To provide a consistent framework and system of common tools and terms, a matrix approach is used to frame and present the judgements made.

53. The impact assessment will consider the potential for impacts and effects during the construction, O&M, and decommissioning phases of the Bellrock Wind Farm Infrastructure. As required by the EIA Regulations, only effects that are likely to be significant require detailed assessment.

54. Where a different approach has been necessary to reflect the specific assessment requirements of a particular receptor, this is described in the relevant technical chapters in this Bellrock WFDA EIA Report:

- **Chapter 12: Shipping and Navigation (Volume II)**;
- **Chapter 16: Socioeconomics, Tourism and Recreation (Volume II)**;
- **Chapter 17: Greenhouse Gas Assessment (Volume II)**;
- **Chapter 18: Climate Change Risk (Volume II)**; and
- **Chapter 19: Major Accidents and Disasters (Volume II)**.

5.9.2.1 Identification of Impacts

55. The Bellrock WFDA EIA Report distinguishes between the terms 'impact' and 'effect':

- Impact – is used to describe a change resulting from an activity via the Bellrock Wind Farm Infrastructure. Impacts are defined in terms of their magnitude (see **Section 5.9.2.3**); and
- Effect – is the consequence of an impact combining with a receptor. Effects are defined in terms of their significance (see **Section 5.9.2.4**).

56. Impacts and effects are identified using a conceptual 'source-pathway-receptor' model. The model identifies potential impacts resulting from the proposed activities on the environment and sensitive receptors within it. This process provides an easy-to-follow assessment route between impact sources and potentially sensitive receptors ensuring a transparent impact assessment. The aspects of this model are defined as follows:

- Source – the origin of a potential impact (i.e. an activity such as piling and a resultant effect e.g. underwater noise resulting from FSS and SKS piling works);
- Pathway – the means by which the effect of the activity could impact a receptor (e.g. for the example above, disturbance/injury to nearby marine mammals); and
- Receptor – the element of the receiving environment that is impacted (this could either be a component of the physical, ecological or human environment, e.g. for the above example, species susceptible to noise impacts such as marine mammals).

5.9.2.2 Receptor Sensitivity and Value

57. The characterisation of the existing environment helps to determine the receptor sensitivity to assess the potential impacts upon it.

58. The ability of a receptor to adapt to change, tolerate, and/or recover from potential effects is key in assessing its sensitivity to the effect under consideration. For ecological receptors tolerance could relate to short term changes in the physical environment, for human environment receptors tolerance could relate to displacement effects and therefore effects upon economics or safety. It also follows that the capacity to recover will be a key consideration in determining receptor sensitivity.

59. Example definitions of the different sensitivity levels for a generic receptor are given in **Table 5.4**. Each technical chapter of the Bellrock WFDA EIA Report provides a chapter-specific definition of the sensitivity levels for the relevant receptors.

Table 5.4: Example Definition of Different Sensitivity Levels for a Generic Receptor

Sensitivity	Definition
High	Individual receptor has very limited or no capacity to avoid, adapt to, accommodate or recover from the anticipated impact.
Medium	Individual receptor has limited capacity to avoid, adapt to, accommodate or recover from the anticipated impact.
Low	Individual receptor has some tolerance to accommodate, adapt to or recover from the anticipated impact.
Negligible	Individual receptor is generally tolerant to and can accommodate or recover from the anticipated impact.

60. In addition, for some assessments the value of a receptor may also be an element to add to the assessment where relevant. Receptor value considers whether, for example, the receptor is rare, has protected or threatened status, importance at local, regional, national or international scale, and in the case of biological receptors whether the receptor has a key role in the ecosystem function.

61. Example definitions of the value levels for a generic receptor are given in **Table 5.5.** Each technical chapter of the Bellrock WFDA EIA Report provides a chapter-specific definition of the value levels for the relevant receptors.

Table 5.5: Example Definitions of the Value Levels for a Generic Receptor

Value	Definition
High	Internationally/nationally important (for example internationally or nationally protected site).
Medium	Regionally important (for example regionally protected site).
Low	Locally important/rare but with high potential for mitigation.
Negligible	Not considered to be important (for example common or widespread).

62. The overall receptor sensitivity is determined by considering a combination of value, adaptability, tolerance and recoverability. This is achieved through applying known research and information on the status and sensitivity of the feature under consideration coupled with professional judgement and past experience.

63. The terms ‘high value’ and ‘high sensitivity’ are not necessarily linked within a particular impact, and it is important not to inflate impact significance specifically because a feature is valued. For example, a receptor could be of high value (e.g. an Annex I habitat) but have a low or negligible physical/ecological sensitivity to an impact. In this case, sensitivity should reflect the ecological robustness of the species and not necessarily default to its protected status.

5.9.2.3 Magnitude of Impact

64. The magnitude and probability of an impact occurring has been established through consideration of the following:

- Scale or spatial extent (small scale to large scale or a few individuals to most of the population);
- Duration (short term to long term);
- Likelihood of impact occurring;
- Frequency; and
- Nature of change relative to the baseline.

65. The magnitude of impact from the Bellrock Wind Farm Infrastructure affecting a receptor is identified on a scale from minor alterations or change, up to major changes or the total or substantial loss of the receptor. For certain environmental effects, the magnitude of impact is related to guidance on levels of acceptability (for example, for air quality or noise) and is therefore based on numerical parameters. For others it is a matter of professional judgement to determine the magnitude of change, using descriptive terminology. The relevant guidance for each receptor is discussed in the technical chapters of this Bellrock WFDA EIA Report.

66. The categorisation of magnitude of impact varies for specific pathways, receptors and technical assessments. Example definitions of the magnitude levels for a generic receptor are given in **Table 5.6.** Each technical chapter of the Bellrock WFDA EIA Report provides a chapter-specific definition of the magnitude levels for the relevant receptors.

Table 5.6: Example Definitions of the Magnitude Levels for a Generic Receptor

Value	Definition
High	Fundamental, permanent/irreversible changes, over the whole receptor, and/or fundamental alteration to key characteristics or features of the particular receptor's character or distinctiveness.
Medium	Considerable, permanent/irreversible changes, over the majority of the receptor, and/or discernible alteration to key characteristics or features of the particular receptor's character or distinctiveness.
Low	Discernible, temporary (throughout project duration) change, over a minority of the receptor, and/or limited but discernible alteration to key characteristics or features of the particular receptor's character or distinctiveness.
Negligible	Discernible, temporary (for part of the project duration) change, or barely discernible change for any length of time, over a small area of the receptor, and/or slight alteration to key characteristics or features of the particular receptor's character or distinctiveness.
No change	No measurable or discernible change from baseline conditions. The impact does not result in any alternation to the receptor.

5.9.2.4 Determination of the Significance of Effects

67. Once the technical chapters have defined the sensitivity of each receptor and the magnitude of potential impacts (based on expert judgement), the significance of effects matrix in **Table 5.7** has been applied. This matrix is used to determine the significance of both adverse and beneficial effects. This determination may be quantitative or qualitative and has been informed by expert judgement. All technical chapters have applied the significance of effects matrix, unless otherwise specified in the technical chapter.

68. In EIA terms, major and moderate adverse effects are generally considered to be significant in EIA terms, and as such, may require mitigation. Whilst minor effects are not significant in their own right, these may contribute to significant effects cumulatively or through interactions. Each technical chapter sets out receptor-specific guidance that will be used to assess the significance of effects. Impacts that are moderate or major adverse are considered to be significant in EIA terms[4]. Definitions for each level of significance are presented in **Table 5.8**.

Table 5.7: Matrix for Evaluating the Significance of an Effect (Adverse or Beneficial)

Sensitivity	Magnitude				
	High	Medium	Low	Negligible	No Change
High	Major	Major	Moderate	Minor	No effect
Medium	Major	Moderate	Minor	Negligible	No effect
Low	Moderate	Minor	Minor	Negligible	No effect
Negligible	Minor	Negligible	Negligible	Negligible	No effect

Table 5.8: Definitions of Effect Significance

Effect Significance	Definition
Major	Very large or large change in receptor condition, both adverse or beneficial, which are likely to be important considerations at a regional or district level.
Moderate	Intermediate change in receptor condition, which are likely to be important considerations at a local level.
Minor	Small change in receptor condition, which may be raised as local issues but are unlikely to be important in the decision-making process.
Negligible	No discernible change in receptor condition.
No Effect	No change in receptor condition; therefore, no effect.

[4] Whilst all technical chapters of this Bellrock WFDA EIA Report consider moderate/major adverse impacts significant in EIA terms, it is noted that the methodology to determine level of impact can vary between chapters. Specifically, **Chapter 12: Shipping and Navigation, Chapter 17: Greenhouse Gas Assessment** and **Chapter 19: Major Accidents and Disasters (Volume II)** use methodologies that deviate slightly from the standard significance of effect matrix approach used across the other technical Chapters.

5.9.2.5 Mitigation

69. Each technical chapter identifies and assesses impacts and effects and takes into consideration potential changes to the project design parameters to reduce the severity of an effect or, where that is not possible, environmental mitigation measures that will be adopted in the development, operation and decommissioning of the Bellrock Wind Farm Infrastructure. These measures include avoidance, best practice and design commitments, in line with IEMA's 'Implementing the Mitigation Hierarchy from Concept to Construction' (2024). In accordance with this guidance, three types of mitigation are used within the Bellrock WFDA EIA Report:

- **Primary mitigation:** these measures are treated as an inherent part of the Bellrock Wind Farm Infrastructure. These may include modifications to the location or design made during the pre-application phase, e.g. adoption of methods and equipment for seabed preparation which have been designed to minimise the potential for sediment suspension and dispersal.
- **Secondary mitigation:** actions that will require further activity in order to achieve the anticipated outcome. The effectiveness of such measures have been assessed within the Bellrock WFDA EIA Report and appropriate mitigation will be secured by a consent or licence condition (e.g. engaging with the local community and local authority once assembly and integration ports have been identified).
- **Tertiary mitigation:** actions that would occur with or without input from the EIA. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are standard practices used to manage commonly occurring environmental effects. These measures are treated as an inherent part of the Bellrock Wind Farm Infrastructure. This includes development and adherence to management plans, such as a MPCP and an EMP.

70. Primary and tertiary mitigation are considered to be 'embedded' mitigation. Embedded mitigation measures have been taken into account when determining the magnitude of the impact/change.

71. Secondary mitigation has been applied where there are significant effects identified in the technical chapters. Secondary mitigation will further reduce a negative effect or enhance a positive effect.

72. Environmental mitigation and monitoring measures are recorded in **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** to enable them to be secured (where required) and implemented.

73. The following mitigation plans are submitted alongside this Bellrock WFDA EIA Report and consents/Marine Licence application(s), in line with MD-LOT guidance (MD-LOT, 2025) and supplemented by the Applicant:

- Fisheries Mitigation, Monitoring and Communication Plan;
- Written Scheme of Investigation, including a Protocol of Archaeological Discoveries;
- Marine Pollution Contingency Plan;
- Invasive Non-Native Species Mitigation Plan;
- Outline Navigational Safety and Vessel Plan;
- Outline Lighting and Marking Plan;

- Outline Environmental Management Plan; and
- Outline Marine Mammal Mitigation Protocol;

74. In addition, the following mitigation and monitoring plans are proposed to be developed post-consent:

- Construction Method Statement;
- Construction Programme;
- Decommissioning Programme;
- Development Specification and Layout Plan;
- Emergency Response Cooperation Plan;
- Inter-array Cable Plan;
- Operation and Maintenance Plan;
- Project Environmental Monitoring Plan;
- Piling Noise Mitigation Plan; and
- Seabed Obstruction Mitigation Plan.

75. It was agreed with MD-LOT (**Table 5.2**) that the consent plans for the Bellrock WFDA will be separate to the consent plans for the Bellrock OfTDA due to the different programme each Development Area is following for application.

5.9.2.6 Residual Effects

76. Following the application of any necessary secondary mitigation measures to reduce the severity of potential significant (in EIA terms) negative effects, the significance of residual effects has then been re-assessed for each potential impact following the approach outlined above in **Sections 5.9.2.1** to **5.9.2.5**.

5.10 Transboundary Effects

77. Transboundary effects arise when impacts from a development within one EEA state's[5] territory significantly affects the environment or interests of another EEA state(s). The EIA Directive, and thus the relevant EIA Regulations, requires the assessment of transboundary effects.

78. The United Nations Economic Commission for Europe Convention on EIA in a Transboundary Context (the 'Espoo Convention') presents the need to consider transboundary effects and requires assessments to be extended across borders between Parties of the Convention when a planned activity may cause significant adverse transboundary impacts. The Espoo Convention has been

[5] Following the exit of the UK from the European Union (EU) in December 2020, the UK is no longer an EEA state. However, for the purposes of assessing potential transboundary effects, the approach outlined above has been followed for the Bellrock WFDA.

transposed into domestic law by way of Regulation 18 of the Marine Works (environmental impact assessment) Regulations 2007. These Regulations set out the processes for consultation and notification. In the event that a project is considered to cause significant transboundary effects, the EIA Regulations require Scottish Ministers to engage with the affected EEA State and invite them to participate in consultation.

79. The assessment of potential transboundary effects considers the following elements:

- Characteristics of the Bellrock WFDA;
- Location of the Bellrock WFDA, including proximity to relevant EEA States;
- The Bellrock Wind Farm Infrastructure;
- Environmental context/importance, for example any EEA protected areas which may be affected by the Bellrock Wind Farm Infrastructure;
- Potential pathways of effect;
- The extent of potential effects;
- The scale of the potential effect, to consider magnitude, probability, duration, frequency and recoverability; and
- Cumulative impacts.

80. Consideration of transboundary effects follows the standard approach to EIA with regards to sensitivity, magnitude, and significance, as presented in each technical chapter.

81. As detailed in the technical chapters **(Chapters 6-19 (Volume II)**), the following receptors groups may experience transboundary impacts from the Bellrock Wind Farm Infrastructure:

- **Chapter 9: Marine Mammals;**
- **Chapter 10: Offshore Ornithology;**
- **Chapter 11: Commercial Fisheries;**
- **Chapter 12: Shipping and Navigation;**
- **Chapter 16: Socioeconomics, Tourism and Recreation;**
- **Chapter 17: Greenhouse Gas Assessment;** and
- **Chapter 18: Climate Change Risk.**

5.11 Inter-related Effects

82. Inter-related effects refer to the inter-relationships between EIA topics and interactions between impacts which may lead to different or greater environmental effects than if considered solely in isolation and presents an understanding of potential impacts holistically at a wider ecosystem scale.

83. The technical chapters of the Bellrock WFDA EIA Report consider the potential for:

- Inter-relationships between impacts from different technical chapters. Offshore assessments are largely receptor based (e.g. marine mammals, fish, birds, marine users etc). There is the potential for an impact on a receptor to have secondary effects, spatially and temporally, on another receptor considered in another technical chapter and these inter-relationships are identified and assessed within this Bellrock WFDA EIA Report. For example, impacts on fish can have wider ecosystem implications, as this can lead to changes in prey resource for marine mammals and birds, but could also affect commercial fisheries through the disturbance of commercially important fish resources leading to subsequent displacement or disruption of fishing activity. As such inter-relationships are covered as an integral part of the assessment.
- Interactions between impacts, i.e. where impacts identified and assessed for each technical chapter have the potential to interact with each other on the same receptor, which could give rise to synergistic effects as a result. Where impacts assessed in each technical chapter have the potential to interact with one another, these impacts have been assessed relative to each development phase (a 'phase assessment' i.e. construction, O&M or decommissioning) to ascertain where (for example) multiple construction impacts affecting the same receptor could increase the magnitude of effect upon that receptor. Following this, a 'lifetime assessment' has been undertaken where necessary which considers the potential for impacts to affect receptors across all development phases. For example, permanent or temporary habitat loss, increased suspended sediment concentrations and subsequent seabed deposition during construction activities would all give rise to interacting effects upon seabed habitats. As such interactions between impacts are considered as an integral part of the assessment.

84. It should be noted that the inter-related effects assessment considers the effects from the Bellrock Wind Farm Infrastructure only, with potential effects from other projects (including the Bellrock WFDA and Bellrock OnTDA) considered within the CEA (**Section 5.13**).

5.12 Whole Project Assessment

85. As discussed in **Chapter 1: Introduction (Volume II)**, this Bellrock WFDA EIA Report has been prepared to assist MD-LOT in determining (on behalf of Scottish Ministers) the Applicant's s.36 Consent and Marine Licence applications for the Bellrock Wind Farm Infrastructure.

86. Whilst the Bellrock Offshore Transmission Infrastructure and Onshore Transmission Infrastructure form part of the Bellrock Project, these Development Areas will be subject to separate applications for consent. As each constitutes EIA development, the Offshore Transmission Infrastructure and Onshore Transmission Infrastructure will be subject to further EIA under the relevant EIA

Regulations, and the Applicant will prepare and submit further EIA Reports in support of the respective applications.

87. It has not been possible for the Applicant to seek consent for the Offshore Transmission Infrastructure and Onshore Transmission Infrastructure simultaneously with the Wind Farm Infrastructure.[6] However, this Bellrock WFDA EIA Report considers the relationship and interactions between the Bellrock Wind Farm Infrastructure and the other Development Areas of the Bellrock Project. The likely significant effects of the Bellrock Wind Farm Infrastructure together with the Bellrock Offshore Transmission Infrastructure and Onshore Transmission Infrastructure, so far as these can be ascertained at this stage, are assessed as part of this Bellrock WFDA EIA Report.

88. Further assessment of the effects of the Bellrock Project as a whole will be included within the Bellrock OfTDA EIA Report and OnTDA EIA Report, which will include updated assessments of cumulative environmental impacts of the different components of the Bellrock Project. This approach is consistent with the relevant EIA Regulations, which make express provision for a multi-stage consent process, including in circumstances in which the likely significant effects of a project are not fully identifiable at the point at which an application for consent is determined. This multi-stage consent process allows for the potential effects of a project with different component parts to be assessed and considered as further information and detail becomes available.

89. It has been possible for the Applicant to identify at this stage the likely significant effects of the Bellrock Project as a whole for socioeconomics and greenhouse gas assessments (**Chapter 16: Socioeconomics, Tourism and Recreation (Volume II)** and **Chapter 17: Greenhouse Gas Assessment (Volume II),** and relevant appendices). These whole-project assessments will be updated in the future Bellrock OnTDA and OfTDA EIA Reports taking account of any refinements of project details within the design envelopes considered for each Development Area of the Bellrock Project. This approach was agreed with Aberdeenshire Council (**Table 5.2**).

90. For other receptors, sufficient worst-case information concerning the project design envelope for the proposed Bellrock OfTDA and Bellrock OnTDA has been included in this Bellrock WFDA EIA Report (see **Chapter 4: Project Description (Volume II)**) to understand the potential cumulative effects of the Bellrock Wind Farm Infrastructure together with the Bellrock Offshore and Onshore Transmission Infrastructure. These effects are assessed as part of the CEA undertaken throughout this Bellrock WFDA EIA Report.

91. In view of the distance between the Bellrock WFDA and the Bellrock OnTDA, it is considered that (except as identified above) there is no pathway for cumulative effects between the Bellrock Wind Farm Infrastructure and the Bellrock Onshore Transmission Infrastructure to arise. Given the absence of a pathway for such effects, and the lack of direct interaction between the Bellrock Wind Farm Infrastructure and the Onshore Transmission Infrastructure, the Bellrock OnTDA has not influenced the consideration of alternatives and mitigation within this Bellrock WFDA EIA Report.

[6] At the time the Scoping Request for the Bellrock WFDA was submitted (March 2024), the Bellrock Project's grid connection solution was a coordinated connection to an offshore substation. However, in April 2025 the National Energy System Operator (NESO) imposed a change to the Bellrock Project's grid connection, with this revised to a radial onshore connection at the SSEN Transmission proposed Hurlie substation in Aberdeenshire. As a result, the site selection processes for the Bellrock OfTDA and OnTDA remain ongoing, and it has been necessary for the Applicant to make a separate application for the Bellrock WFDA.

5.13 Cumulative Effects Assessment

92. The CEA considers the likely significant effects of impacts arising from the Bellrock Wind Farm Infrastructure cumulatively with the potential effects from other relevant plans, projects and activities.

93. The CEA is essential to identify other reasonably foreseeable developments or activities with which the Bellrock Wind Farm Infrastructure may interact, resulting in cumulative effects. Cumulative effects may arise from all phases (construction, O&M, and decommissioning) of the Bellrock Wind Farm Infrastructure.

94. Schedule 3 of the Marine Works (environmental impact assessment) Regulations 2007 and Schedule 4 of the Electricity Works (environmental impact assessment) (Scotland) Regulations 2017 require that cumulative effects of the development should be described in the Bellrock WFDA EIA Report. Planning Circular 1/2017 (Scottish Government, 2017a) and PAN 1/2013 (Scottish Government, 2017b)[7] also set out this requirement. There is currently no specific Scottish guidance on the methodological framework for assessing cumulative effects in general. PAN 1/2013 acknowledges that:

"*assessment methods for cumulative impacts and interactions vary"* and that it is a *"matter of professional judgement to ensure the relevant projects and activities – and their environmental effects – are identified, taking into account the circumstances of the individual proposal and its location*".

95. The CEA for the Bellrock Wind Farm Infrastructure was undertaken in accordance with the relevant guidance set out in **Section 5.5** specifically 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment', Planning Inspectorate (2024). This guidance, whilst relating to nationally significant infrastructure projects in England and Wales, is considered most robust and appropriate for the Bellrock Wind Farm Infrastructure, in the absence of the Scottish led CEF (relevant to marine mammals and offshore ornithology) (see **Table 5.2** for further details on agreement with NatureScot to this approach).

96. A cumulative effects screening exercise was undertaken to identify relevant other projects and plans which may have a cumulative effect on each receptor, as described in **Section 5.13.2**.

5.13.1 Stage 1: Cumulative Effects Screening

97. In accordance with the guidance documents set out in **Section 5.5**, other plans or projects that are deemed likely to go ahead or are going ahead, and for which sufficient information is available have been taken forward for consideration.

98. **Appendix 5.3: CEA Long List of Projects (Volume IV)** presents the CEA screening and has been based on a four month cut off period for other projects and plans, which represents a shorter cut-off than the six months that was proposed in the Scoping Report (**Appendix 1.1: Bellrock WFDA Scoping Report (Volume IV)**), with the exception of **Chapter 9: Marine Mammals**

[7] These guidance documents relate to Town and Country Planning applications; however the principles of assessment are consistent across EIA.

(Volume II) which uses a six month cut-off for modelling, and **Chapter 10: Offshore Ornithology (Volume II)** which uses NEEOG led cumulative work package as agreed with NatureScot, Feb 2025 (**Table 5.2**). The Bellrock WFDA EIA Report has taken account of phase of other projects and plans (i.e. scoping, application, consent, construction, operation) publicly available as of December 2025, four months prior to the submission of the consent application for the Bellrock Wind Farm Infrastructure. Further details on the approach for specific receptors are discussed in technical chapters (**Chapters 6 – 19 (Volume II)**) as appropriate. The Applicant considers this an appropriate cut-off, ensuring that other recent projects are considered within the CEA whilst allowing sufficient time for a robust assessment of cumulative effects to be undertaken. Given the early stage of development (as noted above - see **Section 5.12**) of the Bellrock OfTDA and OnTDA, the Bellrock OfTDA and the Bellrock OnTDA have been considered as "other projects" throughout the CEA.

99. For the purposes of the CEA, the criteria of other plans or projects that have been considered including projects:

- Already constructed;
- Under construction;
- Permitted application(s), but not yet implemented;
- Submitted application(s) not yet determined; and
- Plans and projects which are "reasonably foreseeable" including:
  - Projects in Scottish waters;
  - Projects in English waters, or other non-UK parts of the North Sea if considered to be relevant, have connectivity, or the potential of a cumulative effect;
  - Any proposed project that has submitted a Scoping Report up to four months prior to the Bellrock WFDA consent application date; and
  - Offshore wind and non-wind projects.

100. The temporary mooring of FSSs and/or FOUs at dedicated locations (known as 'wet storage') for the Bellrock Project will be considered through separate consenting process(es) as required. The Applicant is not seeking consent for wet storage within this application, and it has not been included within the scope of this EIA Report. Any proposed projects in the public domain for wet storage facilities on the east coast of Scotland have been considered within the cumulative assessment along with other projects and plans (**Appendix 5.3: CEA Long List of Projects (Volume IV)**).

101. The initial 'long list' of plans or projects has been developed based on the above criteria, and was screened for each potential impact-receptor pathway using the following process:

- **Conceptual overlap:** an impact-receptor pathway (in EIA terms) describes an impact which has the potential to directly or indirectly affect the receptor(s) in question;
- **Physical overlap:** ability for impacts arising from the Bellrock Wind Farm Infrastructure to overlap with those from other plans or projects on a receptor basis. An overlap of the physical extents of the impacts arising from the two (or more) projects/plans must be established for a

cumulative effect to arise. There are exceptions to this for certain mobile receptors that are potentially subject to impacts from multiple plans or projects; and

- **Temporal overlap:** for a cumulative effect to arise from two or more plans or projects, a temporal overlap of impacts arising from each must be established. Some impacts are active only during certain phases of development (e.g. piling noise during construction). However, the absence of a strict overlap may not necessarily mean there is no potential for cumulative effect, as receptors may become further affected by additional, non-temporally overlapping projects.

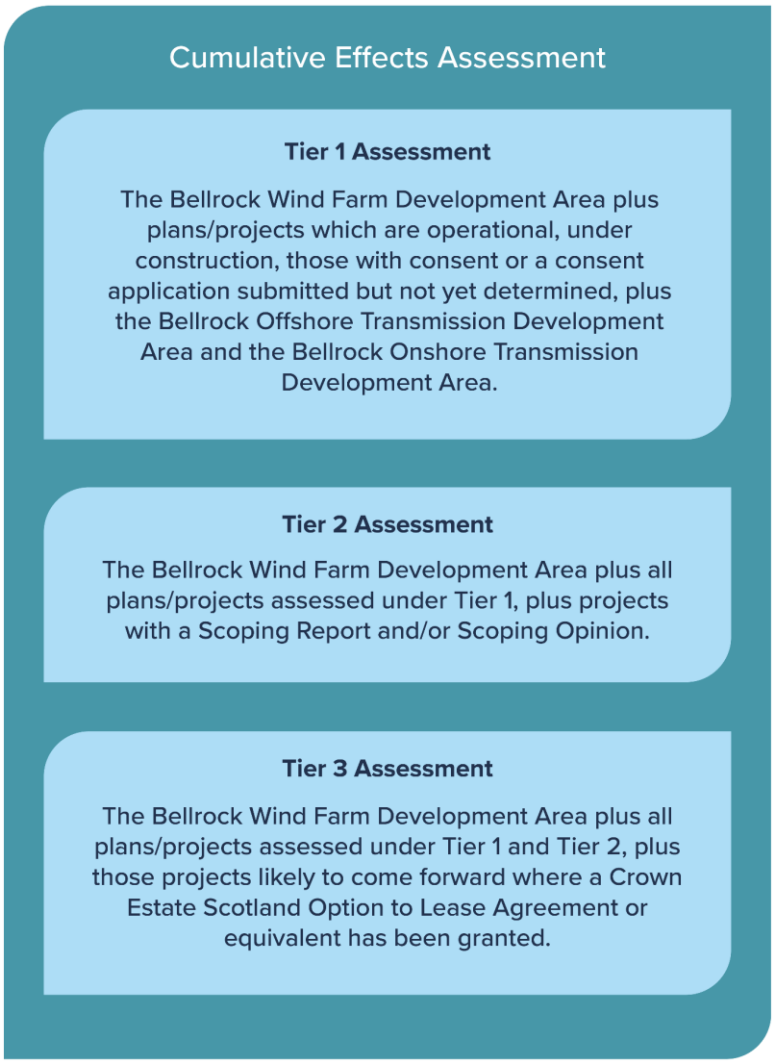
102. The CEA long list is provided in **Appendix 5.3: CEA Long List of Projects (Volume IV)**. After review of the long list, the remaining projects or plans have been taken forward to the assessment stage (Stage 2b, **Section 5.13.2** below) as detailed in the relevant technical chapters (**Chapters 6 to 19 (Volume II)**). MD-LOT were consulted during the screening process as part of ongoing consultation in the pre-application phase.

5.13.2 Stage 2: Cumulative Effects Assessment

103. For the assessment stage, information has been gathered on plans or projects taken forward from the CEA plans and projects screening stage. All impacts considered in the Bellrock WFDA-alone assessment were initially brought forward for CEA impact pathway screening within the assessment stage. Impacts with no rationale for cumulative effects with other plans or projects (i.e. those assessed as no change or where impacts were highly localised and therefore would not contribute to a cumulative effect), were screened out.

104. A tiered approach has been used when undertaking this stage of the CEA, which provides a framework for placing relative weight upon the potential for each plan or project to be included in the CEA, based upon the plans or project's current stage of maturity and certainty in the design or effects. Projects or plans have been assessed in Stage 2 (**Chapters 6 to 19 (Volume II)**) using the tiers shown in **Plate 5.3**. Although the Applicant has not yet submitted a Scoping Report for Bellrock OfTDA and OnTDA, and full details for the transmission infrastructure are yet to be finalised, the Bellrock OnTDA and OfTDA are considered as tier 1 projects within the Bellrock WFDA CEA, due to being fundamental to the function of the Bellrock Wind Farm Infrastructure.

Plate 5.3: Cumulative Effects Assessment Staged Approach



5.14 Other Assessments

5.14.1 Habitats Regulations Appraisal

106. Closely linked to the EIA process is the Habitats Regulations Appraisal (HRA), which is the process used to determine impacts on internationally important designated sites and species. While the HRA is often undertaken alongside the EIA process, these are two distinct requirements and the HRA does not form part of the Bellrock WFDA EIA Report.

107. The Habitats Regulations[8] require a HRA to be undertaken where a project could affect a designated site (Special Protection Area, Special Area of Conservation, proposed or candidate

[8] Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017. See **Chapter 2: Policy and Legislative Context (Volume II)** for further details.

Special Protection Area and Special Area of Conservation or Ramsar site), either individually or in combination with other plans or projects, in view of the site's conservation objectives.

108. In accordance with the above-mentioned Habitats Regulations, the Applicant has undertaken the relevant assessments[9] to inform an appropriate assessment undertaken by the Scottish Ministers, as Competent Authority. The **Bellrock WFDA Shadow HRA (Volume VI)** has been submitted alongside this Bellrock WFDA EIA Report and application documentation for the Bellrock WFDA. Full details on the HRA process are provided in the **Bellrock WFDA Shadow HRA (Volume VI)**.

5.14.2 Nature Conservation Marine Protected Area Assessment

109. ncMPA in Scotland are designated under the Marine (Scotland) Act 2010 within 12 nm, and Marine Protected Areas (MPA) under the Marine and Coastal Access Act 2009 in offshore waters between 12 nm to 200 nm. ncMPA/MPA are designated to protect biodiversity and heritage, with specific focus on protected features (species, habitats, large scale features or geomorphological features).

110. Where a project may have a significant risk of hindering the achievement of an ncMPA/MPA's conservation objectives, an ncMPA/MPA assessment is required. The Bellrock WFDA ncMPA Assessment has been submitted alongside this Bellrock WFDA EIA Report and application documentation for the Bellrock WFDA. Full details on the ncMPA assessment process are provided in the **Bellrock WFDA Report to Inform ncMPA Assessment (Volume VII)**.

[9] A HRA Screening Report (**Appendix A** of the **Report to Inform Appropriate Assessment Part 1: Introductory Chapters (Volume VII)** was prepared for the Bellrock WFDA and informs the **Bellrock WFDA Shadow Habitats Regulations Appraisal (Volume VI)**.

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