

# **Bellrock Offshore Wind Farm**

## **Wind Farm Development Area**

**Environmental Impact Assessment Report - Volume IV**

**Appendix 1.2: Bellrock Wind Farm Development Area**

**Scoping Opinion**

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## **Marine Directorate - Licensing Operations Team Scoping Opinion**

**Scoping Opinion adopted by the Scottish Ministers  
under:**

**The Electricity Works (Environmental Impact  
Assessment) (Scotland) Regulations 2017**

**and**

**The Marine Works (Environmental Impact Assessment)  
Regulations 2007**

**Bellrock Wind Farm Development Area**

**08 August 2024**

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## **1. Introduction**

### **1.1 Background**

- 1.1.1 On 22 March 2024, the Scottish Ministers received a scoping report (“the Scoping Report”) from Bellrock Offshore Wind Farm Limited (“the Developer”) as part of its request for a scoping opinion relating to the Bellrock Wind Farm Development Area (“the Proposed Development”). The Scottish Ministers considered the content of the Scoping Report as sufficient and in accordance with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (“2017 EW Regulations”) and Schedule 4 of The Marine Works (Environmental Impact Assessment) Regulations 2007 (“2007 MW Regulations”), collectively referred to as “the EIA Regulations”.
- 1.1.2 This scoping opinion (“Scoping Opinion”) is adopted by the Scottish Ministers under the EIA Regulations in response to the Developer’s request and should be read in conjunction with the Scoping Report. The matters contained in the Scoping Report have been carefully considered by the Scottish Ministers and use has been made of professional judgment, based on expert advice from stakeholders and Marine Directorate in-house expertise and experience. This Scoping Opinion identifies the scope of impacts to be addressed and the method of assessment to be used in the Environmental Impact Assessment Report (“EIA Report”) for the Proposed Development.
- 1.1.3 The Scottish Ministers, in adopting this Scoping Opinion, have, in accordance with the EIA Regulations, taken into account the information provided by the Developer, in particular, information in respect of the specific characteristics of the Proposed Development, including its location and technical capacity and its likely impact on the environment. In addition, the Scottish Ministers have taken into account the representations made to them in response to the scoping consultation they have undertaken.
- 1.1.4 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”).

- 1.1.5 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.
- 1.1.6 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.
- 1.1.7 The Developer submitted a Habitats Regulations Appraisal (“HRA”) screening report (“HRA Screening Report”) alongside the Scoping Report on 22 March 2024 in relation to the Proposed Development. The Scottish Ministers response to the HRA Screening Report is contained within the relevant receptor chapters of this Scoping Opinion.

## **2. The Proposed Development**

### **2.1 Introduction**

2.1.1 This Section provides a summary of the description of the Proposed Development provided by the Developer in the Scoping Report together with the Scottish Ministers' general comments in response. The details of the Proposed Development in the Scoping Report have not been verified by the Scottish Ministers and are assumed to be accurate.

### **2.2 Description of the Proposed Development**

2.2.1 The Proposed Development is comprised of an offshore generating station located approximately 120 kilometres ("km") east of Stonehaven in the North Sea. The Proposed Development will have a capacity of greater than 50 Megawatts ("MW") and therefore requires the Scottish Ministers' consent to allow its construction and operation. The Proposed Development will also require a marine licence granted by the Scottish Ministers under the 2009 Act, to permit any and all 'licensable marine activities' carried on for the Proposed Development.

2.2.2 The design envelope for the Proposed Development is broad and there are a number of design parameters which are yet to be determined by the Developer. The technology in relation to the Wind Turbine Generator ("WTG") foundations will consist of floating substructures with fixed bottom substructures also being explored. The area of the Proposed Development in which the WTGs, inter-array cables, Station Keeping Systems ("SKS") and subsea cable hub(s) are located is termed the Array Area and is within the E1 ScotWind Plan Option. The Array Area is approximately 280 square kilometres.

2.2.3 The Proposed Development will have an installed capacity of approximately 1.2 Gigawatts ("GW"). The Proposed Development includes the construction and operation of offshore WTGs and all associated offshore infrastructure within the Array Area. The key components of the Proposed Development will be further refined once more detailed engineering studies have been undertaken but include:

- A maximum of 80 WTGs, all with floating foundations anchored to the seabed by either SKS or fixed bottom substructures.
- Each WTG will have an anticipated capacity range of 15 – 28 MW.
- Maximum rotor diameter of 330 metres ("m").
- Maximum blade tip height of 400m above Lowest Astronomical Tide ("LAT").
- Minimum blade tip clearance of 22m above the water line.

- Five floating WTG foundation options are being considered: semi-submersible, tension leg platform, barge, buoy and semi-spar.
- Three fixed bottom WTG foundation options are being considered: piled jacket structure, suction caisson jacket structure and cable supported monopile.
- Three mooring configurations are considered: catenary, semi taut, taut and tension mooring lines.
- Inter-array cable protection includes cable burial methods and external cable protection such as concrete mattresses and rock placement.
- A subsea cable hub(s) to consolidate multiple WTG inter-array cables into one hub before onward transition to an offshore substation. The number of subsea cables and their footprint will be defined by the Developer in the EIA Report.

2.2.4 The construction of the Proposed Development is anticipated to take up to four years, as detailed in Section 3.9.3 of the Scoping Report, with the operational lifetime of the Proposed Development to be 50 years, followed by a period of decommissioning or repowering. Repowering will be subject to the relevant consenting and licensing requirements at that time as is not covered by this Scoping Opinion.

## **2.3 Onshore Planning/ Transmission Works**

2.3.1 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.

## **2.4 The Scottish Ministers' Comments**

### *Description of the Proposed Development*

2.4.1 Section 3.2 of the Scoping Report states that Project Design Envelope will be further refined once more detailed engineering studies have been undertaken. Although an indicative design envelope has been provided in Tables 3.2 to 3.7 and 3.10 of the Scoping Report, the EIA Report must include a full and detailed description of all options considered within the design envelope. Further

information on the design envelope approach is set out in Sections 2.4.20 to 2.4.23 of the Scoping Opinion below.

- 2.4.2 Section 3.3.2 of the Scoping Report states that the final WTG design will be defined post consent. The Scottish Ministers advise that the EIA Report must include a full and detailed description of all WTG parameters considered within the design envelope.
- 2.4.3 Section 3.4 of the Scoping Report states that a number of substructure designs are currently being reviewed for the Proposed Development including floating and fixed bottom substructures. A design envelope has been provided in Tables 3.3 and 3.4 of the Scoping Report. The Scottish Ministers advise that the EIA Report must include a full and detailed description of all substructure designs considered within the design envelope.
- 2.4.4 Section 3.5 of the Scoping Report states different mooring and anchor solutions may be used across the Proposed Development and will be dependent on site characteristics such as ground conditions which will be determined during the design development. A design envelope has been provided in Tables 3.5 and 3.6 of the Scoping Report. The EIA Report must provide details of the anchor and mooring design options being considered within the design envelope. In section 3.8 of the Scoping Report the Developer outlines that scour protection may be used as required to mitigate scour around the foundations. For the avoidance of doubt, the use of scour protection must be assessed in the EIA Report including details on materials, quantities and location.
- 2.4.5 Section 3.7.1 of the Scoping Report outlines that both static and dynamic inter-array cables are under consideration for the Proposed Development. Dynamic inter-array cables with auxiliary cable items, such as buoyancy modules and bend stiffeners, are likely to be required to allow cables to be deployed in various configurations in the water column to help reduce fatigue and protect the cable. Section 3.7.2 also outlines that inter-array cables will either be buried below the seabed (the method of which is yet to be determined) or will utilise external cable protection such as rock placement and concrete mattresses once cabling becomes static on the seabed. The EIA Report must provide an estimate of the anticipated likelihood of suitable burial along cable routes and be clear on the range of burial depths that have been considered as part of the assessment. Clear narrative must be provided within the EIA Report to show how this has been estimated prior to the further geophysical and geotechnical surveys being undertaken. Where reliance is placed on a subsequent cable plan or cable burial risk assessment as mitigation, the EIA Report must explain how this measure will mitigate the effects, what measures are proposed for inclusion and the effectiveness and degree of confidence that can be placed on such measure. It is recommended that such plans are included alongside the EIA Report.

- 2.4.6 Any cable protection to be used to protect the inter-array cables must be assessed in the EIA Report including details on materials, quantities and location. In addition, any seabed levelling or removal of substances or objects from on or under the seabed, required for installation of inter-array cables will require consideration in the EIA Report and may require a marine licence. Should seabed preparation involve dredging, the EIA Report must identify the quantities of dredged material and identify the likely location for deposit. The Developer may also be required to submit pre-dredge sample analysis, this should include supporting characterisation of the new or existing deposit sites.
- 2.4.7 Section 3.7.7 of the Scoping Report states that the Proposed Development will include the use of subsea cable hub(s) to consolidate multiple WTG inter-array cables into one hub before onward transition to an offshore substation. The Developer outlines that the number of subsea cable hub(s) and their footprints is subject to further engineering studies and will be defined in the EIA Report. The Scottish Ministers advise that the EIA Report must include a full and detailed description of all subsea cable hub(s) options being considered including the design, size and foundations.
- 2.4.8 Section 3.9.2 of the Scoping Report outlines that boulders may be present at the site of the Proposed Development. The EIA Report must provide the anticipated estimate of boulders to be cleared (including how much uncertainty may be associated with the figures presented). Clear narrative must be provided within the EIA Report to show how this has been estimated.
- 2.4.9 Section 3.9 of the Scoping Report provides an overview of the proposed development phases. There is brief mention of pre-construction surveys and site investigations including geophysical surveys and unexploded ordnance (“UXO”) surveys within Section 3.9.2. The Scottish Ministers advise that the EIA Report must describe and assess the environmental effects, including in-combination effects, of the range of surveys which may be required such as geophysical and geotechnical survey activities and UXO clearance. The EIA Report must also include consideration of the options which will be assessed in relation to UXO clearance, the differences amongst them and an assessment of the environmental effects of these options. In this regard, the Scottish Ministers advise that the EIA Report must include a worst case scenario of high order detonation in terms of impact and mitigation, unless there is robust supporting evidence that can be presented to show consistent performance of the preferred low order or deflagration method. The Scottish Ministers refer to the Joint

Statement – Marine environment: unexploded ordnance clearance<sup>1</sup> in this regard.

- 2.4.10 Section 3.9.4 of the Scoping Report details that operation and maintenance activities will be considered within the EIA Report. The Scottish Ministers advise that the EIA Report must provide a full description and consideration of the nature and scope of these activities, including the types of activity, their frequency, how activities will be carried out for the Proposed Development and any anticipated cumulative impacts with neighbouring developments. Such proposed activities may require to be permitted by a marine licence issued for the Proposed Development, unless an exemption applies.
- 2.4.11 Section 3.9.5 of the Scoping Report confirms a decommissioning programme will be prepared and submitted to Scottish Ministers in line with the Energy Act 2004 and that further details will be provided in the EIA Report. The EIA Report must include an assessment of potentially significant effects during the decommissioning phase of the Proposed Development. Any uncertainty on the impacts upon receptors from activities during decommissioning should be clearly explained, along with the implications for the assessment of significant effects.
- 2.4.12 The EIA Report must provide the estimate of expected residues and emissions, for example drill cuttings where considered, in the design envelope. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 2.4.13 The Scottish Ministers were content to consult on the Scoping Report without coordinates included. However, the coordinates must be included alongside the EIA Report detailing the outline of the offshore turbine array.
- 2.4.14 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.
- 2.4.15 A number of consultees have provided advice in relation to ‘wet storage’, including NatureScot which has identified it as a potentially significant impact

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<sup>1</sup> <https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-interim-position-statement>

pathway. The Scottish Ministers are considering their position on this topic and will advise of any updates.

- 2.4.16 Regulatory approvals will be required for licensable activities including all construction activities, whether as part of the original construction or any subsequent alteration or improvement, any deposit on, or removal from on or under, the seabed of substances, any dredging and deposit, and any use of explosive substances. Any reference to the 'Proposed Development' in this Scoping Opinion should be taken, as appropriate, to include all activities in connection with the construction, alteration, improvement (including 'change-outs' of components) and decommissioning of the Proposed Development for which a regulatory approval will be needed. The Developer should give consideration to all activities related to the Proposed Development which require regulatory approval and ensure that these are applied for as appropriate.
- 2.4.17 With regards to the HRA Screening Report, the Scottish Ministers highlight that the representations provided by consultees should be taken into account in the HRA Report to be submitted alongside the EIA Report. Detailed advice is provided in the receptor chapters in Section 5 of this Scoping Opinion.
- 2.4.18 The Sectoral Marine Plan for Offshore Wind ("the Plan") identified that for E1, where the Development is proposed, further regional-level survey and research work and assessment was required in order to identify and assess potential impacts. The Scottish Ministers acknowledge that the Developer is contributing to regional ornithological surveys to satisfy the requirements of the Plan. Development in this location may require the consideration / submission of a derogation package under the Habitats Regulations with identification of suitable compensation measures as well as evidence of meeting all the required tests. The Developer should continue to liaise with the Marine Directorate on this point going forward.
- 2.4.19 The Plan assessed a potential maximum realistic development for the E1 site of up to 3 GW of generating 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.

### *Design Envelope*

- 2.4.20 The Scottish Ministers note the Developer's intention to apply a 'Design Envelope' approach. Where the details of the Proposed Development cannot be defined precisely, the Developer will apply a worst case scenario, as set out in Section 4.4.1 of the Scoping Report.
- 2.4.21 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.
- 2.4.22 The Scottish Ministers will determine the applications based on the worst case scenario. The EIA will reduce the degree of design flexibility required and the detail may be further refined in a Construction Method Statement ("CMS") to be submitted to the Scottish Ministers, for their approval, before works commence. Please note however, the information provided in Section 7 below regarding multi-stage consent and regulatory approval. The CMS will 'freeze' the design of the project and will be reviewed by the Scottish Ministers to ensure that the worst case scenario described in the EIA Report is not exceeded.
- 2.4.23 It is a matter for the Developer, in preparing the EIA Report, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. If the Proposed Development or any associated activities materially change prior to the submission of the EIA Report, the Developer may wish to consider requesting a new Scoping Opinion.

### *Alternatives*

- 2.4.24 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.

- 2.4.25 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.

### **3. Contents of the EIA Report**

#### **3.1 Introduction**

- 3.1.1 This Section provides the Scottish Ministers' general comments on the approach and content of information to be provided in the Developer's EIA Report, separate to the comments on the specific receptor topics discussed in Section 5 of this Scoping Opinion.

#### **3.2 EIA Scope**

- 3.2.1 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.

#### **3.3 Mitigation and Monitoring**

- 3.3.1 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.
- 3.3.2 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.

- 3.3.3 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.
- 3.3.4 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.

## 4. Consultation

### 4.1 The Consultation Process

4.1.1 Following receipt of the Scoping Report, the Scottish Ministers, in accordance with the EIA Regulations, initiated a 28 day consultation process, which commenced on 10 April 2024. Following consultation extensions, the last response was received on 06 June 2024. The following bodies were consulted, those marked in bold provided a response and those marked in italics sent nil returns or stated they had no comments:

- **Aberdeen Airport**
- Bowdun Offshore Wind Farm
- **British Telecom (“BT”) (Radio Network Protection Team)**
- Campion Offshore Wind Farm
- Civil Aviation Authority
- Community Councils:
  - *Arbroath Community Council*
  - Berwick Upon Tweed Town Council
  - Boddam and District Community Council
  - Broughty Ferry Community Council
  - Buchan East Community Council
  - Burntisland Community Council
  - Carnoustie Community Council
  - Cruden Community Council
  - Dalgety Bay and Hillend Community Council
  - Deer Community Council
  - Fraserburgh Community Council
  - Invercairn Community Council
  - King Edward and Gamrie Community Council
  - Kingsbarns Community Council
  - Longside Community Council
  - Mintlaw Community Council
  - New Aberdour, Tyrie and Pennan Community Council
  - North Berwick Community Council
  - Peterhead Community Council
  - Prestonpans Community Council
  - Rathen, Memsie and Cortes Community Council
  - Rosehearty Community Council
  - Slains and Collieston Community Council
  - Strichen and District Community Council
  - Tranent & Elphinstone Community Council
- Communities Inshore Fisheries Alliance

- Crown Estate Scotland
- Cruising Association (“CA”)
- **Department of Agriculture and Rural Development of Northern Ireland (“DAERA”)**
- Dee District Salmon Fishery Board (“Dee DSFB”)
- Don DSFB
- *Edinburgh Airport*
- Esk DSFB
- Fisheries Management Scotland
- Forth DSFB
- *Forth Ports*
- **Historic Environment Scotland (“HES”)**
- **Inshore Fisheries Group- North & East Coast Regional**
- **Joint Radio Company (“JRC”)**
- Local Authorities:
  - *Aberdeen City Council*
  - Aberdeenshire Council
  - *Angus Council*
  - City of Edinburgh Council
  - *Dundee Council*
  - East Lothian Council
  - *Fife Council*
  - *Northumberland County Council*
  - *Scottish Borders Council*
- Marine Directorate – Compliance (Anstruther Fishery Office)
- Marine Directorate – Compliance (Eyemouth Fishery Office)
- Marine Directorate – Compliance (Fraserburgh Fishery Office)
- Marine Directorate – Compliance (Peterhead Fishery Office)
- Marine Planning & Policy
- Marine Safety Forum
- **Maritime and Coastguard Agency (“MCA”)**
- **Ministry of Defence (“MOD”) - Defence Infrastructure Organisation (“DIO”)**
- Montrose Port
- Morven Offshore Wind
- Muir Mhor Offshore Wind Farm
- **National Air Traffic Services (“NATS”)**
- National Trust for Scotland
- **Natural England**
- **Natural Resources Wales**
- **NatureScot**
- **North Coast Regional Inshore Fisheries Group**

- North Sea Renewables Grid (Cerulean Winds Ltd)
- **North Sea Transition Authority (“NSTA”)**
- **Northern Lighthouse Board (“NLB”)**
- Offshore Energies UK
- Ossian Offshore Wind Farm
- Port Authority – Fraserburgh Harbour Commissioners
- Port Authority – Peterhead
- Rosehearty Harbour Inshore Fisherman’s Association
- Royal National Lifeboat Institution
- *Royal Society for the Protection of Birds (“RSPB”) Scotland*
- **Royal Yachting Association (“RYA”)**
- **Scottish and Southern Electricity Networks (“SSEN”)**
- Scottish Canoe Association
- Scottish Creel Fishermen’s Federation
- *Scottish Environmental Protection Agency (“SEPA”)*
- **Scottish Fishermen’s Federation**
- Scottish Fishermen’s Organisation
- Scottish Government Planning
- Scottish Surfing Federation
- Scottish Water
- Scottish Wildlife Trust
- *Sports Scotland*
- Surfers Against Sewage
- Tay DSFB
- Transport Scotland Ports and Harbours
- Tweed DSFB
- **UK Chamber of Shipping**
- Visit Scotland
- Whale and Dolphin Conservation Society

4.1.2 Specific advice was sought from Marine Directorate – Science, Evidence, Data and Digital (“MD-SEDD”) and Transport Scotland.

## **4.2 Responses Received**

4.2.1 From the list above a total of 30 responses were received. Advice was also provided by MD-SEDD and Transport Scotland. 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 EIA Report.

4.2.2 The Scottish Ministers are satisfied that the requirements for consultation have been met in accordance with the EIA Regulations. The sections below highlight

issues which are of particular importance with regards to the EIA Report and the s.36 consent and marine licence applications. The representations and advice received are attached in Appendix I and each must be read in full for detailed requirements from individual consultees.

## **5. Interests to be considered within the EIA Report**

### **5.1 Introduction**

5.1.1 This section contains the Scottish Ministers' opinion on whether the impacts identified in the Scoping Report are scoped in or out of the EIA Report. The Scottish Ministers advise that the representations from consultees and advice from MD-SEDD and Transport Scotland must be considered in conjunction with the Scoping Opinion and with the expectation that recommendations and advice as directed through this Scoping Opinion are implemented.

### **5.2 Marine Geology, Oceanography and Physical Processes**

5.2.1 The Scottish Ministers are content with the proposed study area described in Section 5.4.1.

5.2.2 The Scottish Ministers are also broadly content with the proposed data sources used to characterise the baseline in Section 5.4.2, however, highlight the MD-SEDD advice regarding 3D model use to characterise the water column structure including stratification and request that this must be fully addressed and implemented in the EIA Report.

5.2.3 Table 5.5 summarises the impacts to be scoped in and out of the assessment. The Scottish Ministers broadly agree with the impacts proposed to be scoped in. However, in line with advice from MD-SEDD, advise that water column stratification and mixing, and the potential influence on nutrient fluxes and primary production is also scoped in due to consistent seasonal stratification. The Scottish Ministers highlight the references provided by MD-SEDD on this topic and advise that they should be considered within the EIA Report.

5.2.4 The Scottish Ministers are content with the approach to the assessment set out in Section 5.7 of the Scoping Report.

5.2.5 The Scottish Ministers are content with the mitigation set out in Section 5.5.1 of the Scoping Report. In line with the representation from NatureScot, the Scottish Ministers advise that the full range of mitigation measures, published guidance, and monitoring requirements are discussed in the EIA Report.

5.2.6 Potential cumulative effects are summarised in Section 5.6.3 of the Scoping Report and the Scottish Ministers are content with this approach.

5.2.7 The Scottish Ministers are in agreement that transboundary impacts can be scoped out of the EIA for Marine Geology, Oceanography and Physical Processes, as discussed in Section 5.6.4 of the Scoping Report.

### **5.3 Benthic Ecology**

- 5.3.1 The Scottish Ministers, in line with Nature Scot, are content with the proposed study area described in Section 6.4.1 and the approach that the buffer may be refined based on the distance of one tidal ellipse.
- 5.3.2 The Scottish Ministers are also broadly content with the proposed data sources used to characterise the baseline in Section 6.4.2, however, highlight the additional source referenced by NatureScot in its representation and request that this is considered in the EIA Report.
- 5.3.3 In line with the representation from NatureScot, the Scottish Ministers broadly agree with the impacts to be scoped in and out as summarised in Table 6.6 of the Scoping Report. The Scottish Ministers highlight the representation made by NatureScot regarding introduction of invasive non-native species from any source, not just marine traffic, and advise that this is fully considered across all phases within the EIA Report. Additionally, the Scottish Ministers highlight the representation made by SFF relating to impacts to benthic invertebrates due to thermal emissions from subsea electrical cables and advise that consideration is given to this in the EIA Report.
- 5.3.4 With regard to the approach to the assessment set out in Section 6.7, the Scottish Ministers are content.
- 5.3.5 The Scottish Ministers note that the Mitigation Register (Appendix 3) includes relevant plans and biosecurity measures. In line with the NatureScot representation, the Scottish Ministers advise that best practice measures should be considered within the EIA Report.
- 5.3.6 Section 6.6.3 of the Scoping Report considers potential cumulative impacts. In line with the NatureScot representation, the Scottish Ministers advise that the Cumulative Effects Assessment for benthic ecology should consider all impacts which may arise from the development and not be limited to the three impacts highlighted in paragraph 467 of the Scoping Report. Additionally, the Scottish Ministers advise that the impacts of electromagnetic field ("EMF") are also considered in the cumulative assessment in line with advice from NatureScot.
- 5.3.7 The Scottish Ministers are in agreement that transboundary impacts can be scoped out of the EIA for Benthic Ecology, as discussed in Section 6.6.4 of the Scoping Report.
- 5.3.8 The Scottish Ministers, in line with the NatureScot representation, agree with the conclusion of the HRA Screening Report that no sites with Annex 1 habitat features need to be taken forward to HRA assessment.

## **5.4 Fish and Shellfish Ecology**

- 5.4.1 The Scottish Ministers are broadly content with the two proposed study areas described in Section 7.4.1, in line with the NatureScot representation, on the basis that the northern boundary of the ICES rectangles is beyond the maximum tidal excursion.
- 5.4.2 With regards to the baseline information described in Section 7.4.2 of the Scoping Report, the Scottish Ministers are broadly content with the proposed data sources proposed, but highlight the representation made by NatureScot regarding clarity relating to use of eDNA and aerial surveys. Additionally, the Scottish Ministers highlight the additional data sources recommended by NatureScot and advise that these are included in the EIA Report.
- 5.4.3 The impact pathways proposed to be scoped in and out of the EIA are summarised in Table 7.8 of the Scoping Report. The Scottish Ministers are broadly content, subject to the following comments. NatureScot highlight that impacts from pre-construction works may also require consideration alongside construction phase impacts and the Scottish Ministers request that this is considered in the EIA Report. The Scottish Ministers highlight the comments made in the representation by NatureScot regarding fish aggregation around WTGs and other hard structures, and also comments regarding noise from the movement of mooring and anchoring cables and advise that these must be scoped in for assessment in the EIA Report. The Scottish Ministers also request that the comments from NatureScot on potential impacts during the decommissioning phase of the Proposed Development are fully considered by the Developer. Additionally, The Scottish Ministers highlight the representation made by NatureScot regarding changes in prey species availability and the requirement for clear linkages between assessments and advise that this is fully considered and implemented in the EIA Report. The Scottish Ministers also highlight the representation made by SFF regarding the scoping in of “accidental release of pollutants.”
- 5.4.4 The Scottish Ministers are broadly content on the approach to the assessment as detailed in Section 7.7, however advise the Developer to fully consider the comments from NatureScot regarding Priority Marine Features and Sensitivity. Additionally, the Scottish Ministers draw attention to the NatureScot representation regarding underwater noise modelling and request that this is fully implemented in the EIA Report.
- 5.4.5 The Scottish Ministers note that Section 7.5.4 of the Scoping Report covers ‘Embedded Mitigation Measures’ and are broadly content with the examples provided. However, the Scottish Ministers highlight the representation made by NatureScot regarding migratory fish and effects of underwater noise during

construction, operation and decommissioning and advise that this is implemented in the EIA Report.

- 5.4.6 Cumulative impacts are considered in Section 7.6.3 of the Scoping Report. The Scottish Ministers are broadly content with the proposed approach.
- 5.4.7 The Scottish Ministers advise that the impacts of EMF are also considered in the cumulative assessment in line with advice from NatureScot.
- 5.4.8 The Scottish Ministers are in agreement that transboundary impacts can be scoped out of the EIA for fish and shellfish, as discussed in Section 7.6.4.
- 5.4.9 With regards to designated site receptors, the Scottish Ministers agree with the NatureScot representation that all Special Areas of Conservation (“SACs”) designated for fish and shellfish species can be scoped out due to distance from the proposed development, as well as the Southern Trench nature conservation Marine Protected Area (“ncMPA”).
- 5.4.10 Additionally, in line with the advice within the NatureScot representation, the Scottish Ministers advise that migratory fish should currently be assessed only through the EIA process and not through the HRA process. However, the Developer should engage with the Scottish Ministers and NatureScot in regard to any change in how diadromous fish should be assessed through EIA and HRA as a result of ongoing research in this area.

## **5.5 Marine Mammals**

- 5.5.1 The Scottish Ministers are content with the study areas as described in Section 8.4.1 of the Scoping Report and highlight the advice included in the representation from NatureScot regarding reference populations and Management Units which should be used in the EIA Report.
- 5.5.2 The Scottish Ministers are content with the data sources presented in Section 1.3 and Table 1.2 of Appendix 4 – Marine Mammals Existing Environment, however would like to highlight the additional data source as suggested within the NatureScot representation which should be included within the EIA.

With regard to the baseline information discussed in Section 8.4 of the Scoping Report, the Scottish Ministers draw attention to the advice provided by NatureScot in relation to where species are recorded in low numbers and their request that this is implemented by the Developer in the EIA Report. In addition, the Scottish Ministers would highlight NatureScot comments regarding reference populations and density estimates which should be fully implemented within the EIA Report.

- 5.5.3 In line with the representation from NatureScot, the Scottish Ministers generally agree with the impacts to be scoped in and out as detailed in Sections 8.6.1 and 8.6.2 in the Scoping Report, however, would agree with the NatureScot representation that potential impacts from pre-construction works may also require consideration alongside construction phase impacts. The Scottish Ministers draw attention to the representation from NatureScot on entanglement and indirect impacts from EMF on prey availability and request the Developer fully considers these comments and they are implemented in the EIA Report.
- 5.5.4 The Scottish Ministers are content with the approach to assessment as detailed in the Scoping Report and highlight the advice included in the representation from NatureScot with regards to sensitivity scoring. The Scottish Ministers request that this must be fully considered and implemented in the EIA Report.
- 5.5.5 In terms of mitigation and monitoring, the Scottish Ministers have reviewed Section 8.5.1 in the Scoping Report which presents embedded mitigation measures and advise the full range of mitigation measures and published guidance must be included in the EIA Report along with further information on proposed marine mammal monitoring. The Scottish Ministers advise that geophysical surveys (and appropriate mitigation) must be included in the EIA Report. This is in line with the NatureScot representation.
- 5.5.6 With regard to the approach to the cumulative assessment as described in Section 8.7.6 of the Scoping Report, the Scottish Ministers are broadly content. However, the Scottish Ministers draw attention to the NatureScot representation regarding use of Interim Population Consequences of Disturbance (“iPCoD”) and use of Natural Resource Wales guidance and request that this must be fully addressed in the EIA Report. Scottish Ministers recommend in order to assess cumulative impacts, the Developer uses the Cumulative Effects Framework when compiling the EIA Report.
- 5.5.7 The Scottish Ministers have reviewed Section 8.6.4 in the Scoping Report in regard to potential transboundary effects. The Developer has proposed to scope in transboundary effects for assessment in the EIA Report for marine mammal receptors. The Scottish Ministers disagree with this approach and, in line with the NatureScot representation, consider that, provided the assessment is carried out against the UK marine mammal MUs, transboundary effects can be scoped out for marine mammals at this stage.
- 5.5.8 In regard to the MPA Screening Report, the Scottish Ministers refer to the representation from NatureScot and are generally content with the proposed impacts to be scoped in and out for minke whale.

5.5.9 In regard to the HRA Screening Report, the Scottish Ministers refer to the representation from NatureScot regarding Moray Firth SAC; Berwickshire & North Northumberland Coast and Isle of May SAC; and Firth of Tay and Eden Estuary SAC and advise that these comments are fully addressed in the EIA Report. The Scottish Ministers also refer the Developer to the representation from Natural England who confirm that they do not expect to provide further comments or advice on marine mammal receptors unless the project changes substantially. The Developer should also note the standing advice provided by Natural England.

## **5.6 Offshore Ornithology**

5.6.1 The Scottish Ministers have reviewed Section 9.4.1 of the Scoping Report regarding study areas of offshore ornithology and are broadly content with the defined approach as outlined and this view is supported by the NatureScot representation.

5.6.2 With regard to the data sources presented in Section 9.4.2 and Table 9.3 of the Scoping Report, the Scottish Ministers are broadly content with the information provided. The Scottish Ministers refer to the representation of NatureScot who have noted the data presented refers to the period between March 2022 and February 2023 inclusive. NatureScot have advised receipt of a full second year of a completed Digital Aerial Survey covering two full breeding and non-breeding season should provide a sufficient baseline, and further advice will be provided once the full baseline characterisation report is received. This should be submitted prior to application to ensure any issues, including those highlighted in the NatureScot representation, can be discussed and resolved in advance.

5.6.3 The Developer presents the impacts proposed to be scoped into the assessment in Section 9.6.1 and Table 9.5 of the Scoping Report, with a description of additional supporting analyses required to enable a full assessment of the impacts. The Scottish Ministers are generally content with the impacts proposed which is in agreement with Natural England, however agree with NatureScot that consideration must be taken regarding vessel movements having potential to impact various species, including those sensitive to disturbance. Additionally, in regard to nocturnal species, potential impacts from lighting should be considered; as well as impact on ornithological receptors due to "Wet Storage". These issues will require further discussion pre-application to agree on assessment and resolution requirements. The Scottish Ministers are broadly content with the impacts proposed to be scoped out as described in Section 9.6.2 of the Scoping Report.

5.6.4 The Scottish Ministers are broadly content in the proposed approach to the assessment and request that the NatureScot representation regarding correction

factors for guillemot and razorbill, apportioning, density estimates, collision risk modelling, population viability assessment and Highly Pathogenic Avian Influenza (“HPAI”) must be fully implemented in the EIA Report.

- 5.6.5 In regard to mitigation and monitoring, the Scottish Ministers are broadly content with the measures as provided in Section 9.5.1 and the Mitigation Register (appendix 3) of the Scoping Report. However, the Scottish Ministers agree with the NatureScot representation that the measures in the EIA Scoping Report are minimal given the early stage of the project. The full range of mitigation, monitoring and published guidance should be considered and included within the EIA Report.
- 5.6.6 The Scottish Ministers are largely content with the approach to the potential cumulative impacts, as outlined in Section 9.6.3 of the Scoping Report. The Scottish Ministers highlight the representation from NatureScot who agree that if the Cumulative Effects Framework is published within the project timeframe, then it should be used to undertake the cumulative assessment. Additionally, the comments on cumulative and in-combination effects within the representation from Natural England should be fully considered within the EIA Report.
- 5.6.7 The Scottish Ministers are in agreement with the representation from NatureScot that potential transboundary impacts described in Section 9.6.4 of the Scoping Report are limited and therefore recommend the Developer should engage further with NatureScot and MD-LOT on such impacts prior to finalisation of the EIA Report.
- 5.6.8 In regard to the HRA Screening Report, the Scottish Ministers are generally content, however wish to highlight a number of comments raised in the representation from NatureScot.
- 5.6.9 Regarding connectivity in the breeding season, NatureScot do not recommend screening out of any sites/features prior to the full two years survey work being available. They do support the statement that conclusions will be subject to review following the completion of the second year of the offshore ariel survey programme. The Developer is also directed to the comment regarding seabird assemblages and should ensure that this is reflected in the EIA Report.
- 5.6.10 Additionally, with regard to likely significant effects during all phases of the Proposed Development, potential effects of lighting on ornithological receptors, as well as disturbance from vessel movements should be considered as an impact pathway.
- 5.6.11 The Scottish Ministers highlight the representation from NatureScot recommending inclusion of identification of breeding seabird qualifying features

in Table 8.1, as was included in Table 7.2, and request that this be considered as part of the RIAA to aid consultees in their review.

- 5.6.12 For the avoidance of doubt, the Scottish Ministers do not expect the Developer to carry out two separate offshore ornithological assessments and expect that the NatureScot guidance is followed, although the Scottish Ministers highlight there may be instances where a different assessment is needed to be able to adequately assess in-combination effects on English seabirds. Any differences in approaches between Natural England and NatureScot should be acknowledged when compiling the EIA Report and RIAA.

## **5.7 Commercial Fisheries**

- 5.7.1 The Scottish Ministers are broadly content with the proposed study area shown in Figure 10.4.1 of the Scoping Report.
- 5.7.2 The Scottish Ministers are also broadly content with the data sources used to characterise the baseline as detailed in Table 1.3. However, the Scottish Ministers highlight that AIS fishing vessel tracks over at least a five year period must be used in the EIA Report, as detailed in the advice on commercial fisheries from MD-SEDD. Additionally, the Scottish Ministers highlight the representation made by the SFF with regards to the use of pre-Brexit data to ensure a realistic baseline of fishing activity and the collection of fishing plotter data from fisheries organisations and specific data from smaller vessels and request that this is fully considered in the EIA Report.
- 5.7.3 Table 10.4 of the Scoping Report summarises the impacts proposed to be scoped in, whilst Table 10.5 summarises those proposed to be scoped out of the assessment in the EIA Report for commercial fisheries. The Scottish Ministers, whilst broadly in agreement with the impacts scoped in and out, draw attention to the MD-SEDD commercial fisheries advice and SFF representation regarding additional steaming time during all phases of the project being scoped in and advise that this must be scoped in for assessment in the EIA Report. Additionally, for the avoidance of doubt the Scottish Ministers advise that “physical presence of infrastructure and potential exposure of that infrastructure leading to gear snagging” must be scoped in for all phases of the Proposed Development. The Scottish Ministers also draw attention to the representation made by SFF regarding human casualties and gear snagging and request that this is fully considered in the EIA Report. In addition, the Scottish Ministers highlight the SFF representation relating to boulder clearance and the risk of vessel to structure collision for consideration.
- 5.7.4 In terms of mitigation, the Scottish Ministers highlight the representation from the SFF which includes comments on Fisheries Management and Mitigation

Strategy (“FMMS”) and Navigational Safety Plan (“NSP”) commitments included in Section 10.5.1 of the Scoping Report, as well as proposals on disruption payments, Offshore Fisheries Liaison Officer (“OFLO”) and mitigation measures once operational, which the Scottish Ministers recommend are considered.

- 5.7.5 The Scottish Ministers direct the Developer to the SFF representation regarding design aspects of the Proposed Development, including WTG foundations, inter-array cables, cable burial and protection and pre-construction works. The Scottish Ministers advise that these must be fully considered by the Developer when finalising the design parameters for the Proposed Development.
- 5.7.6 The Scottish Ministers are content with the cumulative impacts considered in Section 10.6.3.

## **5.8 Shipping and Navigation**

- 5.8.1 The Scottish Ministers are broadly content with the study area identified in Section 11.4.1 of the Scoping Report.
- 5.8.2 With regards to the shipping and navigation baseline, in line with the representation from the MCA and UKCoS, the Scottish Ministers are content that that the two separate 14 day periods of Automatic Identification System (“AIS”) data set out in the Scoping Report meets the standard MGN 654. In addition, the Scottish Ministers are content that the traffic surveys will be supported by a 12-month AIS analysis in line with MCA and UKCoS representations. The Scottish Ministers advise that Marine Accident Investigation Branch data included in the EIA Report should cover a 20-year period to fully assess trends and historic incidents in line with UKCoS representation. Finally, the Scottish Ministers highlight the SFF representation relating to WTG spatial footprint for consideration.
- 5.8.3 Table 11.4 of the Scoping Report summarises the potential impacts on shipping and navigation proposed to be scoped in and out for each phase of the Proposed Development. The Scottish Ministers broadly agree with the impacts scoped into the EIA Report, however, advise that loss of station should be scoped into the EIA Report during construction and decommissioning phases, in line with the UKCoS and SFF representations. Additionally, the Scottish Ministers advise that if floating turbines are used, wet storage should be considered in terms of navigational risk in line with representations from MCA and UKCoS. For the avoidance of doubt, the Developer must ensure that each of the possible impacts on navigational issues, including routing and effects on shipping, outlined in the MCA representation are addressed within the EIA Report. The Scottish Ministers highlight the RYA representation around failure of Aids to Navigation marking the devices and delays around sharing of information which should be fully

addressed in the EIA Report. Finally, the Scottish Ministers, in line with NLB representation, request that consideration is given to the potential impact a wreck could have upon navigation.

- 5.8.4 With regards to approach to assessment, the Scottish Ministers confirm that, in line with the MCA representation, the Developer will be required to submit a Navigational Risk Assessment in accordance with MGN 654, accompanied by a detailed MGN 654 checklist. Hydrographic surveys should fulfil the requirements set out in Annex 4 of MGN 654. In addition, the MCA, NLB and UKCoS representations regarding the Design Specification and Layout Plan and Lighting and Marking Plan should be addressed by the Developer in the EIA Report. Finally, the Scottish Ministers direct the Developer to the representation from the UKCoS and advise that the additional documentation highlighted should be considered when assessing the impact on shipping and navigation from the Proposed Development.
- 5.8.5 The Scottish Ministers highlight the MCA representation regarding Search and Rescue (“SAR”), Emergency Response Co-operation Plans, levels of radar surveillance, AIS and shore-based VHF radio coverage. The Scottish Ministers advise that the MCA representation must be fully addressed within the EIA Report and that a SAR checklist must be completed by the Developer in consultation with the MCA.
- 5.8.6 With regards to cabling routes and cable burial, the Scottish Ministers advise that a Burial Protection Index should be completed and, subject to the traffic volumes, an anchor penetration study may be necessary. The Scottish Ministers advise that this should be fully addressed in the EIA Report and highlight the MCA advice on a maximum 5% reduction in surrounding depth referenced to Chart Datum if cable protection measures are required. Finally, the Scottish Ministers highlight the SFF representation relating to cable burial and protection for consideration.
- 5.8.7 In line with the representation from the MCA, the Developer should note that compliance with regulatory expectations for floating infrastructure, as stated in Appendix 3 Table 1.1, is required and Third-Party Verification of the mooring arrangements will also be required.
- 5.8.8 The Scottish Ministers highlight, in line with MCA representation, that the development area carries a moderate amount of traffic and several important commercial shipping routes to/from UK ports and the North Sea. This requires that careful attention is paid to routing, particularly in heavy weather, so that vessels can continue to make safe passage without large-scale deviations.
- 5.8.9 With regard to potential cumulative effects summarised in Section 7.2.8 of the Scoping Report, the Scottish Ministers are broadly content with the approach

proposed and highlight the MCA requirement for an appropriate assessment of the distances between the neighbouring offshore renewable project boundaries and shipping routes in line with MGN Standard 654 which must be addressed in the EIA Report. This view is supported by the NLB. The Scottish Ministers additionally note the representation from UKCoS which recommends a wider routeing study area of 50 nautical miles when considering the cumulative impact assessment with regards to routeing impacts in combination with other developments and advise that this is implemented within the EIA Report.

5.8.10 The Scoping Report states that the impact assessment for the Proposed Development, both in isolation and cumulatively, will consider vessel routeing to and from international ports by international operators. Therefore, the Developers consider that the impacts proposed to be scoped in and out of assessment in the EIA Report may be relevant at a transboundary level. The Scottish Ministers are content with this approach.

## **5.9 Aviation and Radar**

5.9.1 The Scottish Ministers are broadly content with the study area as defined in Section 12.4.1 of the Scoping Report and that the baseline data gathered for the assessment is appropriate.

5.9.2 In Table 12.3 of the Scoping Report the Developer summarises the potential impacts to Aviation, Military and Communications during the different phases of the Proposed Development. The Scottish Ministers largely agree with the impacts scoped in to and out of the EIA Report.

5.9.3 The Scottish Ministers highlight the representation from NATS which predicts that the Proposed Development is likely to generate false primary plots and also a reduction in the probability of Perwinnes RADAR to detect real aircraft. NATS has also advised that the Proposed Development will likely have unacceptable impacts to Prestwick Air Traffic Control ("ATC"), Military ATC and Aberdeen ATC. This view is supported in the representation from Aberdeen Airport with regard to aerodrome safety in the safeguarding area for Aberdeen in relation to construction and maintenance activities associated with the Proposed Development. The Scottish Ministers therefore recommend the Developer engage further with NATS on these points and advise that these impacts must be assessed, and appropriate mitigation proposed, in the EIA Report.

5.9.4 The Scottish Ministers highlight the representation from MOD DIO, which acknowledges the potential for the proposed development to impact the operation and capability of the Air Defence Radars at Remote Radio Head Buchan. The Scottish Ministers, in line with MOD DIO advice, therefore advise

that these impacts must be assessed, and appropriate mitigation proposed, in the EIA Report.

## **5.10 Marine Infrastructure and Other Users**

- 5.10.1 The Scottish Ministers are broadly content with the study area as defined in Section 13.4.1 of the Scoping Report.
- 5.10.2 Baseline data sources are considered in Section 13.4.2. The Scottish Ministers consider the baseline data gathered for the assessment is appropriate.
- 5.10.3 Table 13.3 of the Scoping Report presents the impacts the Developer proposes to scope in to and out of the EIA Report during the different phases of the Proposed Development. The Scottish Ministers are broadly content with the impacts scoped in and out for assessment in the EIA Report.
- 5.10.4 The Scottish Ministers note the representation from SSEN Transmission which outlines nearby licensed and future subsea transmission infrastructure. The Scottish Ministers request that the Developer fully considers the SSEN Transmission representation and its nearby transmission infrastructure in the EIA Report.
- 5.10.5 The Scottish Ministers emphasise the importance of engaging with other marine users, including developers of ScotWind and INTOG projects, during all phases of the Proposed Development.
- 5.10.6 The Scottish Ministers agree with the approach to cumulative assessment and agree that transboundary effects can be scoped out of assessment in the EIA Report.

## **5.11 Marine Archaeology and Cultural Heritage**

- 5.11.1 The Scottish Ministers are broadly content with the study area as defined in Section 14.4.1 of the Scoping Report and that the baseline data gathered for the assessment is appropriate. This view is supported by HES.
- 5.11.2 The Scottish Ministers are broadly content with the impact pathways scoped into the EIA as outlined in Table 14.3 of the Scoping Report, however in line with HES representation, request that the Developer considers assessing potential impacts out with the Proposed Development site boundary for the assessment of indirect physical impacts on marine archaeology. In addition, the Scottish Ministers highlight the advice from HES regarding the potential for adverse effects on marine archaeology and note that detailed assessment has not yet been undertaken to identify these effects and their significance.

- 5.11.3 The Scottish Ministers recommend that the Developer provides the Written Scheme of Investigation, Archaeological Desk Based Assessment and Protocol for Archaeological Discoveries to HES to ensure that the assessments and any mitigation measures proposed are appropriate.
- 5.11.4 The methodology, as outlined in Section 14.7, is acceptable to the Scottish Ministers which is in agreement with the HES representation.
- 5.11.5 The Scottish Ministers are content that the mitigation measures outlined in Section 14.5.1 of the Scoping Report are sufficient to manage and mitigate impacts on the marine historic environment, however note that these may change as an outcome of the above discussions still to take place.
- 5.11.6 The Scottish Ministers agree with the proposed approach to cumulative impact assessment and transboundary impacts.

## **5.12 Seascape, Landscape and Visual Impact**

- 5.12.1 The Scottish Ministers agree with NatureScot's representation that the Seascape, Landscape and Visual Impacts for the offshore elements of the Proposed Development can be scoped out of the EIA Report.

## **5.13 Socioeconomics, Tourism and Recreation**

- 5.13.1 The Scottish Ministers are broadly content with the study areas as detailed in Section 16.4.1 of the Scoping Report, however in line with MD-SEDD socioeconomics advice, advise that the assessment of socio-economic impacts would benefit from the inclusions of a short list of potential epicentres of impact. In addition, the MD-SEDD socioeconomics advice in relation to scenario mapping must be fully addressed in the EIA Report.
- 5.13.2 The Scottish Ministers advise that the most up to date data sources must be used for all analysis and direct the Developer to the MD-SEDD socioeconomics advice in this regard.
- 5.13.3 In line with the MD-SEDD socioeconomics advice, the Scottish Ministers advise that a full Socio-Economic Impact Assessment ("SEIA") must be included with the EIA Report and should be transparent in its methodological choices for assessment of socioeconomic impacts. The Scottish Ministers draw attention to Annex 1 of the MD-SEDD socioeconomics advice which may be of assistance when developing the SEIA.
- 5.13.4 In Table 16.5 of the Scoping Report the Developer summarises the potential impacts to Offshore Socio-Economics during the different phases of the

Proposed Development. The Scottish Ministers broadly agree with the impacts scoped in and out however, advise that socio-cultural impacts, tourism and recreation must be scoped in and fully assessed in the EIA Report. This is in line with the MD-SEDD socioeconomics advice.

- 5.13.5 In relation to social impacts, the Scottish Ministers advise that their current position is that the Developer should consider potential impacts on local communities as a result of the Proposed Development and outline how baseline data will be collected to assess impacts in the future. The Scottish Ministers are considering this position and, should this develop or change, the Developer will be notified.
- 5.13.6 In relation to economic impacts, the Scottish Ministers are broadly content with the proposed assessment approach as detailed in Section 16.7 of the Scoping Report, however, recommend that the Developer include additional analysis regarding potential job creation in comparison to existing jobs in the study area, as outlined in the MD-SEDD socioeconomics advice. In addition, the Scottish Ministers agree with the MD-SEDD socioeconomics advice that a detailed description of the methodology used to assess economic impacts must be included in the EIA, outlining the methodological approach taken and any key assumptions that underpin any estimates.

## **5.14 Climate Change**

- 5.14.1 The Scottish Ministers are largely content with the Developer's approach in assessing Green House Gases ("GHG") and climate change effects within Section 17 of the Scoping Report, noting that the IEMA Environmental Impact Assessment Guide "Assessing Greenhouse Gas Emissions And Evaluating Their Significance" provides further insight on this matter. The Scottish Ministers have considered this together with the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the requirement of the EIA Regulations to assess significant effects from the Proposed Development on climate. The Scottish Ministers highlight that the GHG assessment should include the pre-construction, construction, operation and decommissioning phases, including consideration of the supply chain as well as benefits beyond the life cycle of the Proposed Development. The NatureScot representation regarding climate change and carbon costs should be fully addressed by the Developer within the EIA Report.
- 5.14.2 The Scottish Ministers direct the Developer to the NatureScot representation in relation to blue carbon assessment. The Scottish Ministers advise that consideration should be given to impacts on blue carbon as a result of the Proposed Development as well as an expanded assessment for benthic ecology focusing on potential impacts on marine sediments.

## **5.15 Offshore Air Quality**

- 5.15.1 The Scottish Ministers agree with the Developer's view that Offshore Air Quality for the offshore elements of the Proposed Development can be scoped out of the EIA Report.

## **5.16 Major Accidents and Disasters**

- 5.16.1 The EIA Report must include a description and assessment of the likely significant effects deriving from the vulnerability of the Proposed Development to major accidents and disasters. The Developer should make use of appropriate guidance, including the recent Institute of Environmental Management and Assessment ("IEMA") 'Major Accidents and Disasters in EIA: A Primer', to better understand the likelihood of an occurrence and the Proposed Development susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development potential to cause an accident or disaster.
- 5.16.2 The Scottish Ministers advise that existing sources of risk assessment or other relevant studies should be used to establish the baseline rather than collecting survey data and note the IEMA Primer provides further advice on this. This should include the review of the identified hazards from your baseline assessment, the level of risk attributed to the identified hazards and the relevant receptors to be considered.
- 5.16.3 The assessment must detail how significance has been defined and detail the inclusions and exclusions within the assessment. Any mitigation measures that will be employed to prevent, reduce or control significant effects should be included in the EIA Report.

## **6. Application and EIA Report**

### **6.1 General**

- 6.1.1 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.
- 6.1.2 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.
- 6.1.3 A gap analysis template is attached at Appendix II to record the environmental concerns identified during the scoping process. This template should be completed and used to inform the preparation of the EIA Report. As part of the submission of the EIA Report the Scottish Ministers advise that the Developer must provide confirmation of how this Scoping Opinion is reflected in the EIA Report.

## 7. Multi-Stage Consent

### 7.1 Background

- 7.1.1 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.
- 7.1.2 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”.
- 7.1.3 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.
- 7.1.4 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.

Emma Lees

08 August 2024

Authorised by the Scottish Ministers to sign in that behalf.

**Appendix I: Consultation Responses & Advice**

*Please refer to separate document provided alongside the Scoping Opinion*

**Appendix II: Gap Analysis**

*Please refer to separate document provided alongside the Scoping Opinion*

# Aberdeen Airport Response

FAO Iain MacDonald  
Marine Directorate  
Scottish Government

*Via Email*

ABZ Ref: ABZ3237

1<sup>st</sup> May 2024

Dear Iain

**Ref: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

I refer to your request for scoping opinion received in this office on 10<sup>th</sup> April 2024.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The proposed site is located outwith the safeguarding area for Aberdeen Airport;
- Construction activities and maintenance/repair carried out in port locations or wet storage areas located within the safeguarding area for Aberdeen may impact aerodrome safeguarding and should be considered. Detailed assessments may be required once these locations/activities are known.

Our position with regard to this proposal will only be confirmed once the development details are finalized and we have been consulted on a full planning application. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operation impact and cumulative effects.

Yours Sincerely

<Redacted>

Kirsteen MacDonald

Safeguarding Manager

Aberdeen Airport

<Redacted>

[abzsafeguard@aiairport.com](mailto:abzsafeguard@aiairport.com)



# Aberdeen City Council Response

**From:** [Robert Forbes](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [PI](#)  
**Subject:** Mail ID - 47860 - RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 12 April 2024 17:06:40  
**Attachments:** [image001.png](#)

---

Good afternoon

I refer to the above scoping consultation received on 10/04/24 which has been forwarded to me to reply.

It is noted that the proposed development lies a considerable distance outwith the administrative boundary of Aberdeen City Council. I can advise that this Council's Planning Authority therefore has no detailed comments or direct interest in relation to the scoping of the assessment and potential impacts.

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.

I trust that the above comments are of assistance.

Yours sincerely

Robert Forbes MRTPI

Senior Planner

Development Management

Strategic Place Planning

Aberdeen City Council

Business Hub 4

Marischal College

Broad Street

Aberdeen

AB10 1AB

T: 01224 067942

<Redacted>

E: [rforbes@aberdeencity.gov.uk](mailto:rforbes@aberdeencity.gov.uk)

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**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT**

# Angus Council Response

**From:** [Stephanie G Porter](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 12 April 2024 09:31:49  
**Attachments:** [image001.png](#)

---

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

I refer to your email below and can confirm Angus Council has reviewed the scoping report and the Habitats Regulations Appraisal screening report and has no comments to make given the proposals limit impact on Angus. However, Angus Council would advise that the opinion of NatureScot would be of importance in terms of potential impacts upon the qualifying features of the Montrose Basin SPA.

Yours sincerely,

**Stephanie Porter** | Team Leader – Development Standards | Planning & Sustainable Growth | Angus Council | Angus House | Orchardbank Business Park, Forfar, DD8 1AN | (01307 492378)  
**Covid:** As restrictions ease, the emphasis will continue to be on personal responsibility, good practice and informed judgement. [Get the latest information on Coronavirus in Scotland.](#)

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**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact

# Arbroath Community Council Response

**From:** [MD Marine Renewables](#)  
**To:** [arbroathcommunitycouncil@gmail.com](mailto:arbroathcommunitycouncil@gmail.com)  
**Cc:** [Rosanne Dinsdale](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited - Bellrock Offshore Wind Farm - Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 23 April 2024 10:42:00  
**Attachments:** [image001.png](#)

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Good morning Stuart,

Thank you for your email.

To facilitate Arbroath Community Council in submitting any comments with regard to the Bellrock Offshore Wind Farm Limited Scoping Report, MD-LOT would like to direct you to the following sections within the report for your consideration:

- Policy and Legislative Context - Section 2.8 (Page 26)
- Approach to Scoping – Section 4.10 (Page 104)
- Marine Geology, Oceanography and Physical Processes – Section 5.8 (Page 126)
- Benthic Ecology – Section 6.8 (Page 156)
- Fish and Shellfish Ecology – Section 7.8 (Page 194)
- Marine Mammals – Section 8.8 (Page 234)
- Offshore Ornithology – Section 9.8 (Page 275)
- Commercial Fisheries – Section 10.8 (Page 312)
- Shipping and Navigation – Section 11.8 (Page 328)
- Aviation and Radar – Section 12.8 (Page 349)
- Marine Infrastructure and Other Users – Section 13.8 (Page 363)
- Marine Archaeology and Cultural Heritage – Section 14.8 (Section 377)
- Seascape, Landscape and Visual Impact – Section 15.8 (Page 389)
- Socioeconomics, Tourism and Recreation – Section 16.8 (Page 410)
- Climate Change – Section 17.8 (Page 436)
- Offshore Air Quality – Section 18.8 (Page 447)
- Major Accidents and Disasters – Section 19.8 (Page 461)

Within each of the outlined sections noted above, the Developer has outlined a series of questions to consultees that you may wish to respond to.

In addition, MD-LOT would like to note that the Developer will hold a public exhibition event (in person or virtually) where stakeholders and members of the public can engage with and provide comment on the proposal to the Developer at that stage too. Also, that prior to the public exhibitions, notifications will be provided to the relevant stakeholders and notices will also be published in local newspapers detailing information on the event and description of the proposal.

If you have any further questions or queries, please don't hesitate to ask.

Kind Regards  
Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

<Redacted> | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**



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[Marine licensing and consenting: privacy notice - gov.scot \(www.gov.scot\)](https://www.gov.scot/government/consultation/marine-licensing-and-consenting-privacy-notice)

---

**From:** arbroathcommunitycouncil@gmail.com <arbroathcommunitycouncil@gmail.com>

**Sent:** Wednesday, April 17, 2024 8:46 PM

**To:** MD Marine Renewables <MD.MarineRenewables@gov.scot>

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited - Bellrock Offshore Wind Farm - Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Mr MacDonald,

The Council discussed this report at our Planning Meeting on Monday. The Scoping Report is a highly technical document and as Community Council that is entirely run by volunteers, we do not have sufficient technical expertise to provide comments. If you can provide a list of specific points the Council could consider providing an opinion on, we could reconsider this. Otherwise you will need to accept that merely sending a 400 page document to Community Councils for comment cannot be considered to be a facilitated pro-active 'consultation'.

Regards

Stuart Walker

Secretary

**Royal Burgh of Arbroath Community Council.**

[arbroathcommunitycouncil@gmail.com](mailto:arbroathcommunitycouncil@gmail.com)

---

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

# BT Radio Network Protection Team Response

**From:** [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** RE: WID13403 - SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation  
**Date:** 17 May 2024 12:38:25  
**Attachments:** [image002.png](#)  
[image003.jpg](#)  
[image004.png](#)  
[image001.jpg](#)

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**OUR REF: WID13403**

Thank you for your email dated 13/05/2024.

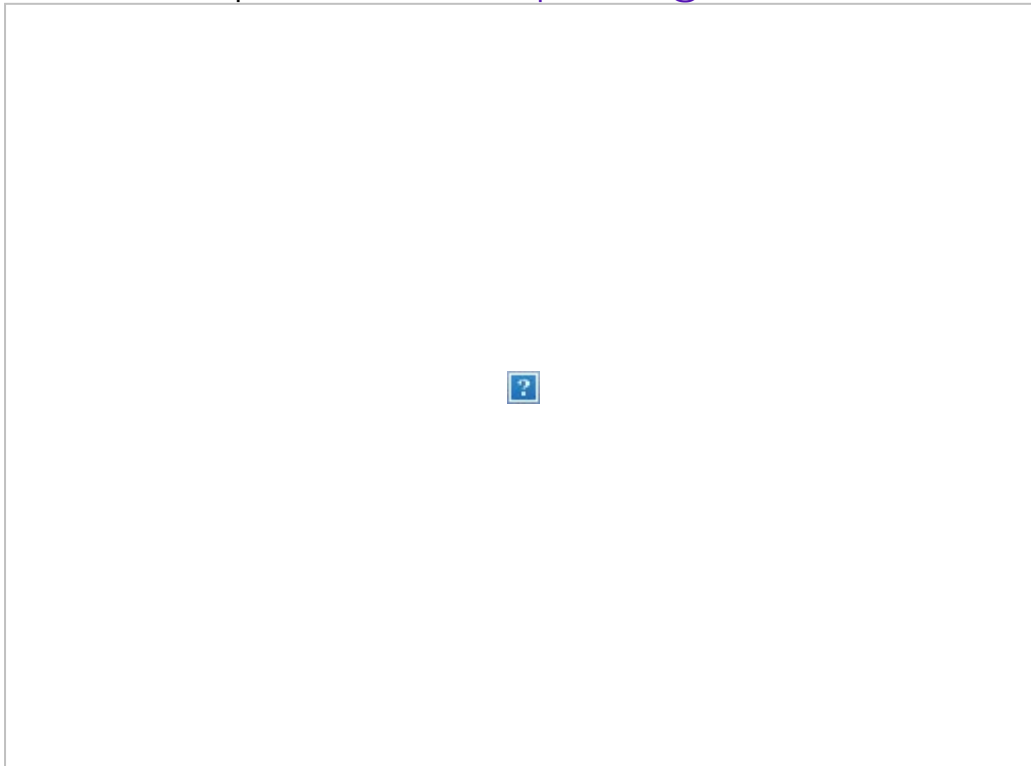
We have studied this proposal using the co-ordinates in the attached with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that the project indicated using the location map below should not cause interference to BT's current and presently planned radio network.

BT requires 100m minimum clearance from any structure to the radio link path. If any changes are proposed to the information supplied, please let us know and we can reassess this for you.

Please note: this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.

Please direct all queries to [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)



**Kind Regards**

**Lisa Smith**

National Radio Planner  
Network Planning



This email contains information from BT Group that might be privileged or confidential. And it's only meant for the person above. If that's not you, we're sorry - we must have sent it to you by mistake. Please email us to let us know, and don't copy or forward it to anyone else. Thanks.

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---

**From:** MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>  
**Sent:** Monday, May 13, 2024 12:55 PM  
**To:** MD.MarineRenewables@gov.scot  
**Cc:** Rosanne.Dinsdale@gov.scot; Emma.Lees@gov.scot  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 08 May 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards

Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

M: **Redacted** | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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**From:** MD Marine Renewables  
**Sent:** Wednesday, April 10, 2024 4:57 PM  
**To:** MD Marine Renewables <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>  
**Cc:** Rosanne Dinsdale <[Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot)>; Emma Lees <[Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)>  
**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
Dear Sir/Madam,

Department of Agriculture,  
Environment and Rural Affairs  
Response

SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm –  
Scotwind E1E Site - Scoping Consultation

Marine Conservation Branch

DAERA Marine and Fisheries Division welcome the opportunity to comment on this proposal. As the location of the wind farm is in excess of 500km from the nearest Marine Protected Area within the Northern Ireland inshore area, we are content that sites designated for marine mammals will not be impacted and therefore do not need to be screened into any assessment. We are content with the inclusion of Rathlin Island SPA for further assessment in the RIAA due to the presence of species with large foraging ranges.

# Dundee City Council Response

**From:** [Alistair Hilton](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 15 April 2024 13:59:06  
**Attachments:** [image001.png](#)

---

Dear Sirs,

I can advise that Dundee City Council has no comment on the scoping consultation or the HRA.

Regards,



**Alistair Hilton**

Principal Planning Officer (Planning & Economic Development) at City Development

---

**E** [alistair.hilton@dundeecity.gov.uk](mailto:alistair.hilton@dundeecity.gov.uk)

**P** [01382 433760](tel:01382433760)

**W** [www.dundeecity.gov.uk](http://www.dundeecity.gov.uk)

**A** [Dundee House, 50 North Lindsay Street, DUNDEE, DD1 1QE](#)

---

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** 10 April 2024 16:56

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot) <[Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot)>; [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot) <[Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)>

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

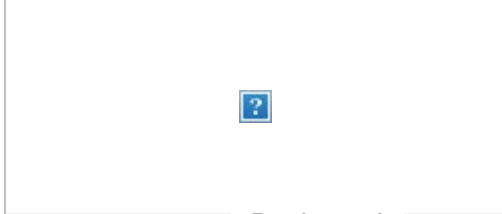
# Edinburgh Airport Response

**From:** [Safe Guarding](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Safe Guarding](#)  
**Subject:** SCOP-0043 - Bellrock Offshore Windfarm Limited  
**Date:** 23 April 2024 09:28:51  
**Attachments:** [image001.png](#)

---

Good morning,  
In respect of the above, I can confirm the location of this development falls out with our Aerodrome Safeguarding zone for Edinburgh Airport therefore we have no objection/comment.  
With best regards,  
Claire

**Claire Brown**  
Aerodrome Safeguarding & Compliance Officer



t: +44 (0)131 344 3845 <Redacted>

My working hours are Monday-Friday  
[www.edinburghairport.com](http://www.edinburghairport.com)

Edinburgh Airport Limited  
Room 3/54, 2<sup>nd</sup> Floor Terminal Building  
EH12 9DN, Scotland

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# Fife Council Response

# **Consultee Comments for Planning Application**

## **24/00966/CON**

### **Application Summary**

Application Number: 24/00966/CON

Address: Scottish Government Consultation Fife

Proposal: Regulation 13 and Schedule 4 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007, Regulation 12 of the Electricity Works (Environmental Impact Assessment) (Scotland) 2017|cr|SCOP-0043 - Bellrock Offshore Window Farm Ltd - Bellrock Offshore Wind Farm - Scotwind E1E Site - Approx. 120km East of Stonehaven and Habitats Regulations Appraisal Screening Report - RESPONSE DUE BY 08.05.24

Case Officer: Scott Simpson

### **Consultee Details**

Name: Mr Mark Berry

Address: Fife House, North Street, Glenrothes, Fife KY7 5LT

Email: Not Available

On Behalf Of: Natural Heritage, Planning Services

### **Comments**

All bases appear to have been covered by the Scoping Report, with potential impacts and the impact assessment scope identified. Data sources for Sections 6-9 are appropriate, as are the list of impacts, species scoped in/out, embedded mitigations, etc.

The approach to assessment of Commercial Fisheries (Section 10) appears equally thorough and appropriate, though consultation with the local fishing community was notably limited to Peterhead and Fraserburgh its not known how many (if any) Fife-based/registered fishers operate in this area of the North Sea.

No issues concerning the assessment of features related to the natural heritage interests of Fife have been identified (i.e. including SPAs, etc., and species associated with both the coastal marine and terrestrial environments of the area).

No Fife Council Natural Heritage comment is deemed to be required at this stage in the application process.

# Forth Ports Response

**From:** [Sandra Robson](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 06 May 2024 12:56:04  
**Attachments:** [image001.png](#)

---

Dear Sir/Madam

I confirm Forth Ports has no comment with regard to the below consultation

Regards

**Sandra Robson** | PA to the Chief Legal and Property Officer | Forth Ports Limited

Head Office | 1 Prince of Wales Dock | Edinburgh | EH6 7DX

T: 0131 555 8700 | <Redacted> | <https://forthports.co.uk>

---

**From:** MD.MarineRenewables@gov.scot [mailto:MD.MarineRenewables@gov.scot]

**Sent:** 10 April 2024 16:57

**To:** MD.MarineRenewables@gov.scot

**Cc:** Rosanne.Dinsdale@gov.scot; Emma.Lees@gov.scot

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**(collectively referred to as the “EIA Regulations”).**

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Bellrock Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Bellrock Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **08 May 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

**Please be advised that this consultation request relates to the proposed section 36 consent and marine licence application for the array area only and not the export cable corridor or onshore elements of the works.**

Yours faithfully,

Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

<Redacted> | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**



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# Historic Environment Scotland Response



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ENVIRONMENT  
SCOTLAND

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ALBA

**By email to:**

[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

Marine Directorate (Marine Renewables)  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300072479  
Your ref: SCOP-0043  
08 May 2024

Dear Marine Directorate

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017  
Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E  
Site](#)

Thank you for your consultation which we received on 10 April 2024 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B and C listed buildings.

### **Proposed Development**

We understand that the proposed development comprises an offshore wind farm of between 42 and 80 wind turbines (up to 400m tip height at lowest astronomical tide), with associated floating substructures and fixed bottom structures, station keeping systems for each turbine, mooring lines, anchors, inter-array cables, subsea cable hub and associated protection and scour protection. We note that this scoping report does not include the export cable or the onshore elements of the works.

### **Scope of assessment**

The marine historic environment is discussed in Chapter 14: Marine Archaeology and Cultural Heritage. We note that the applicant states that a Scoping Workshop took place on the 30 October 2023 (*paragraph 1039*). We were not a participant in this workshop, and this is our initial consultation for the proposed development. We are content however that the correct legislation, policy and guidance has been identified and presented in (*Table 14.1*) and that this has formed the basis for the content of the scoping report.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



The Environmental Impact Assessment (EIA) report for the proposed development intends to use a Project Design Envelope (PDE) approach to assess the worst case/most adverse scenario for the potential range of options proposed for this aspect of the development along with a Maximum Design Scenario. We are content that this is an appropriate approach to the assessment.

### Marine archaeology

We welcome that palaeo-landscape features, sub-seabed deposits of palaeo-environmental interest, prehistoric occupation sites and wreck and aviation remains will be considered within the EIA report. We note that an initial *'high-level desk-based review'* (*paragraph 1042*) has been undertaken to inform the scoping exercise and that the study area for this only includes the proposed development site boundary. We would recommend that the applicant also considers assessing potential impacts outwith this area for the assessment of indirect physical impacts on marine archaeology.

The applicant identifies that geophysical survey (magnetometer, side-scan sonar, sub bottom profiler and multi beam echosounder) took place between August and September 2023 Within the proposed development site boundary (*paragraph 1048*), however detailed results of the survey are not provided. The applicant predicts a moderate potential for archaeological remains within the site boundary, with a single wreck identified on the UKHO dataset - 'the Karen' (UKHO ID: 3029). In addition within the scoping report, a further three unrecorded wrecks are also identified from geophysical survey.

There is the potential for adverse effects on marine archaeology, and detailed assessment has not yet been undertaken to identify these effects and their significance. In addition, the proposed 'Archaeological Desk Based Assessment' has not yet been supplied, so we cannot be confident at this stage what the full potential impact of the proposed development in the site boundary may be and whether any effects on marine archaeology might be significant.

We would welcome sight of the Archaeological Desk Based Assessment, the Written Scheme of Investigation and Protocol of Archaeological Discoveries, to ensure that the assessment and any mitigation proposed are appropriate.

### Terrestrial historic environment

We note that it is intended to scope out impacts on the setting of terrestrial historic environment assets. Given the distance to shore, we are content that onshore designated assets will not be affected by the offshore wind farm and impacts on their settings can therefore be scoped out.

We note that the cable route and onshore elements for the proposed development will be considered under separate submissions, and we would expect onshore historic environment assets to be considered for both of these, including impacts on setting.

### **Further information**



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Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at [www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes](http://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes). Technical advice is available on our Technical Conservation website at <https://www.engineshed.scot/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is **Kevin Mooney** and they can be contacted by phone on 0131 651 6787 or by email on [kevin.mooney@hes.scot](mailto:kevin.mooney@hes.scot).

Yours faithfully

**Historic Environment Scotland**

# Joint Radio Company Response

**From:** [JRC Windfarm Coordinations Old](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Iain Macdonald](#); [Wind SSE](#)  
**Subject:** Bellrock Offshore WF [WF496928]  
**Date:** 14 May 2024 12:00:26

---

Dear scottish,

A Windfarms Team member has replied to your co-ordination request, reference **WF496928** with the following response:

*If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.*

*Please do not reply to this email - the responses are not monitored.  
If you need us to investigate further, then please use the link at the end of this response or login to your account for access to your co-ordination requests and responses.*

---

*Dear Iain*

*Thank you for the GIS files and coordinates provided from the developer.*

***Our Ref:*** WF496928

***Planning Ref:*** SCOP-0043

***Name/Location:*** Bellrock Offshore Wind Farm

***Site Envelope Boundary (NGR):***

702615 6308829  
702766 6302440  
689101 6302889  
681555 6296113  
673268 6296476  
672595 6310031  
702615 6308829  
702615 6308829

***Turbine Locations (NGR):*** 42-80 turbines - positions TBC (within design envelope above).

***Max Hub Height:*** 235m      ***Max Rotor Radius:*** 165m

*This proposal is **cleared** with respect to radio link infrastructure operated by the local energy networks.*

*JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.*

*In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.*

*In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.*

*It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.*

*Regards*

*Wind Farm Team*

*Friars House  
Manor House Drive  
Coventry CV1 2TE  
United Kingdom*

*Office: 02476 932 185*

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.*

*Registered in England & Wales: 2990041*

*[About The JRC | Joint Radio Company | JRC](#)*

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We hope this response has sufficiently answered your query.

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<https://breeze.jrc.co.uk/tickets/view.php?id=33164>

# Maritime and Coastguard Agency Response



Maritime &  
Coastguard  
Agency

**Vaughan Jackson**  
Maritime and Coastguard Agency  
UK Technical Services - Navigation  
Bay 2/24  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG

[www.gov.uk/mca](http://www.gov.uk/mca)

Your Ref: SCOP-0043

Date: 8<sup>th</sup> May 2024

Iain MacDonald  
Marine Scotland - Marine Planning & Policy  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Via email: [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

Dear Iain MacDonald,

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATIONS FOR THE BELLROCK OFFSHORE WIND FARM LIMITED - UNDER THE EIA REGULATIONS.**

The MCA has reviewed the scoping report provided by Bellrock Offshore Wind Farm Limited as detailed in your correspondence of 10<sup>th</sup> April 2024 and would like to comment as follows:

The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk.
- Navigational Safety.
- Visual intrusion and noise.
- Risk Management and Emergency response.
- Marking and lighting of site and information to mariners.
- Effect on small craft navigational and communication equipment.
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels.

The development area carries a low to moderate amount of traffic with several important commercial shipping routes to/from UK ports and the North Sea. Attention will need to be paid to routing, particularly in heavy weather so that vessels can continue to make safe passage without large-scale deviations. The likely cumulative and in combination effects on shipping routes should be considered for this project. It should consider the proximity to other windfarm developments, other infrastructure, and the impact on safe navigable sea room.

A Navigational Risk Assessment will need to be submitted in accordance with MGN 654. This NRA should be accompanied by a detailed MGN 654 Checklist which can be found at <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>

A vessel traffic survey has been undertaken in accordance with MGN 654 and under agreement with the MCA it was deemed that an AIS only winter survey would be acceptable on this occasion. This is due to the more remote location of the Wind Farm Development Area (WFDA) and the very low likelihood of non-AIS equipped vessels being present over the winter months due to the prevailing met ocean conditions. It should be noted that this approach should not be taken as a precedent for any future developments and that the MCA will continue to assess any applications on a case-by-case basis. We understand from Table 11.3 and paragraph 894 that to date a total of 28 days vessel traffic data has been collected. 14 days of AIS data was collected from terrestrial and offshore receivers from 1st February to 14th February 2023, and 14 days of AIS, Radar, and visual observation data was collected via a dedicated vessel traffic survey from 17th August to 31st August 2023. In addition to this, as stated in paragraph 889, the traffic surveys will be supported by a 12-month AIS analysis.

The Development Specification and Layout Plan (DSLPL) referred to in Appendix 3 Table 1.1 and Chapter 11.5.1, paragraph 912 will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

We note in Chapter 4.6, para 298 that Cumulative Effects Assessment for the WFDA will be carried out. As discussed in the chapter and illustrated in Appendix 2 Figure 11.4, the proximity to other offshore windfarms in particular the proposed Ossian offshore wind farm will need to be fully considered, with an appropriate assessment of the distances between OREI boundaries and shipping routes as per MGN 654.

It is noted that this scoping report concentrates on the WFDA only. However, attention should still be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.

In Appendix 3 table 1.1 compliance with regulatory expectations on moorings for floating wind and marine devices (HSE and MCA, 2017) is identified as a designed in mitigation measure for floating infrastructure. This guidance should be followed, and a Third-Party Verification of mooring arrangements will be required.

We note in paragraph 305 that *'Temporary mooring of floating substructures (FSSs) and/or floating offshore units (FOUs) (known as 'wet storage') will be undertaken at port(s) or dedicated mooring locations under consents and Marine Licence(s) as required, of the relevant ports/storage locations.'* Further explanation in paragraph 306 states that as this report covers the WFDA only: *'Bellrock WFDA EIA Report will not include consideration of earlier manufacturing activities, port activities (e.g. WTG assembly), or 'wet storage' of the FOUs.'* As use of wet storage will be considered as the project develops, we would like to point out to the applicant that any wet storage solutions should be

discussed in consultation with relevant maritime stakeholders including MCA and Northern Lighthouse Board (NLB). We would also expect the Navigation Risk Assessment to be updated to include the proposals for any wet storage once they are known.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). The report must recognise the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)). A SAR checklist will also need to be completed in consultation with MCA, as per MGN 654 Annex 5 SAR requirements.

MGN 654 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose. Further information can be found in MGN 654 Annex 4 supporting document titled 'Hydrographic Guidelines for Offshore Developers', available on our website: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>. This includes surveys during the pre-construction, post-construction and post-decommissioning stages. We would like to highlight the need to provide the data in either GSF or CARIS format and that Total Vertical and Horizontal Uncertainty (TVU & THU) calculations must be provided.

It is noted that the use of HVAC and HVDC transmission infrastructure is not discussed in this report. We would however like to remind the applicant when considering this that in the case of HVDC installation, consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. If an HVDC cable is being used, we would expect the applicant to do a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition. The developer should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage depending upon the desk-based study and post installation deviation survey).

#### Chapter 11.8, Scoping Questions to Consultees:

- 1) Is the legislation, policy and guidance proposed for consideration as part of the Bellrock WFDA EIA Report (including the NRA) suitable and sufficient?

Yes.

- 2) Is the shipping and navigation study area defined, data sources considered, and proposed data sources to inform the NRA suitable and sufficient?

Yes.

- 3) Is the methodology outlined for undertaking the risk assessment suitable, including on a cumulative level?

Yes.

- 4) Have all potential hazards (impacts) due to the presence of the Bellrock WFDA been identified for shipping and navigation users?

At this stage we are content. The full List of risk controls and associated mitigation measures will be identified during the NRA process of consultation with navigation stakeholders and hazard analysis.

- 5) Are the mitigation measures described suitable and sufficient for managing and mitigating risk associated with the potential hazards?

Yes.

- 6) Do you have any other matters or information sources that you wish to present?

No.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach.

Yours sincerely,

<Redacted>

Vaughan Jackson  
Offshore Renewables Project Lead  
UK Technical Services Navigation

MD SEDD Advice -  
Commercial Fisheries and  
Physical Processes Response



E: [MD-SEDD-RE\\_Advice@gov.scot](mailto:MD-SEDD-RE_Advice@gov.scot)

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

**8 May 2024**  
**(v2 22 May 2024)**

**SCOP-0043 - Bellrock Offshore Windfarm Limited – Bellrock Offshore Wind Farm – Scotwind  
E1E Site - Scoping Consultation**

**Commercial fisheries**

MD-SEDD have reviewed the Bellrock Offshore Wind Farm Scoping Report. MD-SEDD do not agree that the potential impact on additional steaming times during all phases of the project should be scoped out. Given the location of a known *Nephrops* fishing ground to the south east of the array area, it is possible the array may interfere with important steaming routes out of Peterhead. Furthermore, MD-SEDD note that the project design has not been finalised, but if floating substructures are selected (which may have mooring lines and dynamic inter-array cables within the water column), the advisory safe distances from infrastructure could be larger leading to the whole array area itself acting as an obstacle for steaming, even when temporary Safety Zones for maintenance are not in effect. AIS data from 2022 has been presented within the scoping report but this does not provide enough information to justify scoping out this impact at this stage. MD-SEDD advise looking at AIS fishing vessel tracks over at least 5 years to determine whether there will be a significant impact.

MD-SEDD advise that clarity is provided for the impact pathway “Physical presence of



infrastructure and potential exposure of that infrastructure leading to gear snagging". It is included in table 10.4 of impacts scoped in, however in table 10.6 it is marked as scoped out during construction and decommissioning. Justification for this decision should be included within table 10.5 and consistency checked.

### **Physical processes**

The Marine Directorate for Science, Evidence, Data and Digital (MD-SEDD) has reviewed chapter 5 of the scoping report (marine geology, oceanography and physical processes) mainly focusing on changes in tidal and water column processes.

#### *Do you agree with the sensitive receptor categories?*

MD-SEDD agree with the receptors/processes considered in the scoping report, and that those scoped in should be. MD-SEDD advise that water column stratification and mixing, and the potential influence on nutrient fluxes and primary production, be scoped in because the Bellrock development site consistently undergoes seasonal stratification during the summery months. MD-SEDD recognise that preliminary work has been undertaken (SAMS, 2023) to understand the impacts of floating structures on shelf sea stratification, and this evidence should be presented in the EIA. The report confirms that the Bellrock development undergoes seasonal stratification and is typically stratified during the summer months. This report considers the potential for structures to enhance turbulent mixing, and compares this with background mixing (due to seabed friction). The report estimates that the energy converted to TKE by structures could be around 10% of that due to bed friction. The EIA should consider whether this change in mixing could delay the onset of stratification, and what impact this could have on primary production and the wider ecosystem (e.g. potential for this change in physical processes acting as a pathway of change to biological receptors). Furthermore, the potential wind-wake impact (e.g. Christiansen et al. 2023) should also be considered, and compared with the potential structure mixing impact. MD-SEDD note the potential net-gain associated with enhance mixing in the form of potential for enhanced primary production (SAMS, 2023)

#### *Do you agree with conceptual evidence-based assessment of tidal currents, waves, sediment dispersion and stratification?*

MD-SEDD agree that the assessment methodology, for the processes currently scoped in, is appropriate and proportionate.



*Do you have any other matters or information sources that you wish to present?*

There are no suggested data sources in Table 5.3 covering water column structure including stratification. MD-SEDD advise the use of existing 3D model outputs to describe the physical water column in the study area. Daily mean (or hourly) output of temperature and salinity could be used to describe stratification (magnitude, extent, timing) and hourly current speed data could be used to describe flow conditions. The northwest European shelf reanalysis model runs available on Copernicus Marine (e.g. <https://doi.org/10.48670/moi-00059> and <https://doi.org/10.48670/moi-00054>), or Scottish Shelf Model (<https://marine.gov.scot/themes/scottish-shelf-model>) would be sensible model choices. Note there is a climatology available from the Scottish Shelf Model (widely used by the aquaculture industry) which could be used, but there is also a 27 year reanalysis available from the Scottish Shelf Waters Reanalysis Service (<https://tinyurl.com/SSW-Reanalysis>) that can be used to study inter-annual variability (and how this might compare with potential impacts).

### *References*

Christiansen, N., Carpenter, J. R., Daewel, U., Suzuki, N., and Schrum, C. 2023. The large-scale impact of anthropogenic mixing by offshore wind turbine foundations in the shallow North Sea. *Frontiers in Marine Science*, 10.

<https://www.frontiersin.org/articles/10.3389/fmars.2023.1178330>

SAMS, 2023. Understanding the impacts of floating turbine structures on shelf sea stratification, nutrient fluxes and primary productivity.

Yours sincerely,

### **Renewables and Ecology Team**

Marine Directorate – Science, Evidence, Data and Digital



# MD SEDD Advice - Socioeconomics

## Bellrock Offshore Wind Farm - Scoping Report

### **Marine Analytical Unit (“MAU”) Response** **Marine Directorate**

The Bellrock Wind Farm Development scoping report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

We recommend that a full Socio-Economic Impact Assessment be carried out. We provide general advice on how to deliver this in Annex 1.

#### **1. Overview**

##### *1.1. Study areas*

The study areas relevant to the assessment were identified in section 16.4.1. of the scoping report. Although at this stage port location and supply chain hubs have not been defined, the assessment of socio-economic impacts would benefit from the inclusions of a short list of potential epicentres of impact. This can help to define the affected communities, and aid stakeholder engagement and research with local communities. This advice was also mentioned during the scoping workshop, as noted in Table 16.2.

We note that to overcome the difficulty of identifying potential local study areas, it is suggested in section 16.6 to discuss hypothetical areas of impact and undertake scenario planning for impact at potential locations for the construction base and O&M base. We welcome this suggestion, as it might provide information on the nature and scale of impacts that might affect communities. Scenario mapping, however, should not be viewed as a replacement of primary research with stakeholders, including local communities.

##### *1.2. Consultation, stakeholder engagement, and primary data collection*

We noted the consultation activities that have been conducted to date (Table 4.1) and planned future engagement, that includes planned recurring meetings local communities and a public exhibition event(s) where members of the public can engage with and provide comment on the Bellrock WFDA.

It is noted in section 16.6.2 that the assessment of socio-cultural impacts would require primary social research with impacted communities that cannot be identified at the time of the assessment because of the lack of clarity surrounding the future construction and operation ports.

The scoping report also states on in section 16.7.2. that *“To avoid negative impacts of the SEIA process itself, consultation will be limited to stakeholders (such as local*

*authorities). The methodology aims to minimise disruption to communities through over-consultation, and ultimately seeks to avoid reputational damage to the Bellrock WFDA, it's Applicant, the offshore sector in general, and the Scottish Government's consenting processes".*

Academic research (e.g. Aitken et al 2016; Devine-Wright 2011; Firestone et al 2012; Howell 2018; Jijelava and Vanclay 2028; Langbroek and Vanclay 2012; Vanclay 2020) shows that it is important to involve local communities in social impact assessments and address any concerns communities might have. This decreases the delivery risks for projects. Following this research, we believe that the engagement of stakeholders (including local communities) is very important for the assessment of socio-economic impacts, as these communities might be directly impacted by the development. As described in the Annex 1, we recommend conducting a stakeholder mapping exercise to identify all potential stakeholders who might be affected by the development. These stakeholders need to be engaged for identification and assessment of potential impacts (e.g. creation of a working group with local community councils where magnitude and sensitivity of socio-economic impacts is discussed).

It is important not only to inform members of the general public about the development but also gather their views of how they might be affected (primary data collection). Please note that this approach is important not only for the assessment of socio-cultural impacts, but also other social and economic impacts (e.g. communities' views on potential impacts on employment, housing, local services). We recommend that potential socio-economic impacts are discussed with members of the general public and their assessment is fed into the report.

We believe that engagement and research with communities is proportionate to large infrastructure projects, such as offshore wind farms. Moreover, there are examples<sup>1</sup> of how social research has been implemented in practice by some OWFs.

We encourage the developer to engage trained social researchers with experience in qualitative methods to conduct research and primary data collection with communities to ensure that the social science research methods are designed and executed correctly so that the engagement is delivered in as ethical and meaningful way as possible.

### 1.3. Data sources

Please provide a list of data sources used to assess potential socio-economic impacts (see Annex 1 for examples). Please use the most up-to-date data sources.

With regards to Diffley Partnership research mentioned in section 16.6.2., we would like to discourage the use of external literature instead of primary social research, as this might result in poorer quality assessment. Robust evidence produced specifically for the SEIA is required to deliver a good quality assessment.

---

<sup>1</sup> [Environmental Impact Assessment Report - Volume 1 - West of Orkney Windfarm - West of Hoy, Orkney | Marine Scotland Information](#)

## **2. Scoping of impacts**

### *2.1. Social impacts*

We disagree with the scoping out of socio-cultural impacts. Although we note the concern around survey fatigue and support the desire to reduce burden on research participants, there are different means of conducting primary social research (e.g. citizens' juries might be used instead of large-scale surveys). Please refer to the [Methods Toolkit](#) mentioned in Annex 1 we recommend to use.

With regards to the SOWEC collaborative approach (mentioned in section 16.6.2.) that will consider socio-cultural impacts, we are open to developers working together to mitigate the issue of stakeholder fatigue. To provide an example, if different projects are anticipated to create cumulative socio-economic impacts within certain areas and epicentres of impact, the stakeholder engagement and social research regarding these cumulative impacts as well as the socio-economic impact assessment could be shared between the developers. The MAU will consider analyses conducted by individual developers or in collaboration with others, such as analyses delivered through the SOWEC project. The MAU would like to encourage developers to collaborate. However, the MAU would like to note that it is the responsibility of developers to ensure that the SEIA includes the results of such analyses, as the MAU does not support signposting to participation in the project as sufficient for the assessment.

With regards to tourism and potential changes to visitor behaviour as a result of increased activity at ports and harbours mentioned, it is mentioned in para 1139, page 395 that these impacts are going to be scoped out of the assessment, because the location of ports is not yet known. Please consider scoping in all potential impacts on tourism and recreation.

### *2.2. Economic impacts*

We broadly agree with the scoping report's proposed approach for assessing economic impacts, in particular that the assessment will include direct, indirect and induced impacts for all phases of the project. It's also pleasing that the assessment will take into account deadweight, leakage, displacement and substitution, and that sensitivity analysis will be performed to account for risk, uncertainty and optimism bias. Please refer to our guidance shown in Annex 1 for further information.

The scoping report outlines that employment impacts will be assessed at each phase of the project in terms of years of employment and jobs. If it is possible to supply additional information about the types of jobs that are expected to be created (e.g. part-time, full-time, skilled, unskilled etc) and how these compare to the existing jobs in the study area, this will add further depth to the analysis.

We expect to see a detailed description of the methodology used to assess economic impacts in the assessment, including specific details about the methodological approach taken and any key assumptions that underpin any estimates. This may be supplied in a technical annex if necessary.

### 3. Conclusions

We broadly agree with the scoping report's proposed approach for assessing economic and social impacts. However, we disagree with the scoping out of socio-cultural impacts. We would like to encourage the developer to conduct more engagement and social research with local communities. We recommend that you employ a social researcher with qualitative research expertise to collect primary data from communities to understand their responses to potential socio-economic changes resulting from the development.

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# **Annex 1: General Advice for Socio-Economic Impact Assessment**

## **Marine Analytical Unit (MAU)**

### **Marine Directorate**

#### **December 2023**

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Marine Analytical Unit (MAU), Marine Directorate.

### **Section 1. Some general best practice tips**

- Take a proportionate approach to SEIA in line with the size and generating capacity of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
  - Social research and economist training, qualifications and experience
  - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes that affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for MAU to understand why impacts have been scoped out and we may suggest scoping them back in.

### **Section 2. Key components of a Socio-economic Impact Assessment**

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods (see Methods Toolkit referenced at the end of this Annex) to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what you wish to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

### **Pre-scoping activities**

- 1) Getting started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.
- 2) Develop a detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.
- 3) Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).
- 4) Define potential impact areas on land** taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate

including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

- 5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

**Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.**

- 6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

- **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts
- **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified
- **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)
- **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

- 7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact

prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys, interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

**8) Produce list of anticipated impacts to be covered in the scoping report**

setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Directorate to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

**Post scoping activities for the SEIA**

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

**9) Conduct baseline analysis** to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

**10) Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal):** Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report. Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts
- Leakage, displacement and substitution effects
- Deadweight
- Cumulative impacts
- Sensitivity analysis to account for risk, uncertainty and optimism bias

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.

Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts.

All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

## **11) Development enhancement, mitigation strategy and complete SEIA report.**

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the

assessment, and the approach to analysis. The report should cover the baseline analysis and results of the impact prediction or appraisal, and distributional impacts. Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

### **Section 3. Examples of different types of socio-economic impacts**

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

#### **Examples of Socio-economic Impacts from Glasson 2017<sup>2</sup>**

##### **1. Direct economic:**

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

##### **2. Indirect/induced/wider economic/expenditure:**

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (eg tourism; fisheries);
- effects on development potential of area; and

##### **3. Demographic:**

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

##### **4. Housing:**

- various housing tenure types;

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<sup>2</sup> Glasson J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), *Methods of Environmental and Social Impact Assessment*, Abingdon: Routledge

- public and private;
- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

#### 5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

#### 6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

#### 7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location

- effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice

### Section 4: Useful Data Sources for Socio-Economic Impact Assessments

| Name                       | Summary  | Link to Source   |
|----------------------------|--|--|
| Statistics.gov.scot        | Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option. | <a href="http://statistics.gov.scot">statistics.gov.scot</a>                           |
| Marine Economic Statistics | Annual economic statistics publication including GVA and employment data for marine economy sectors.                       | <a href="http://www.gov.scot">Marine economic statistics - gov.scot (www.gov.scot)</a> |

|   |  |   |
|---|--|---|
| Scottish Sea Fisheries Statistics               | Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish fishing fleet and employment on Scottish vessels.                                  | <a href="http://www.gov.scot">Sea fisheries statistics - gov.scot (www.gov.scot)</a>                        |
| Scottish Shellfish Farm Production Survey 2022  | Statistics on employment, production and value of shellfish from Scottish shellfish farms.   | <a href="http://www.gov.scot">Scottish Shellfish Farm Production Survey 2022 - gov.scot (www.gov.scot)</a>  |
| Scottish Annual Business Statistics 2020        | Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business. | <a href="http://www.gov.scot">Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)</a>        |
| Sub-Scotland Economic Statistics Database       | The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.  | <a href="http://www.gov.scot">Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)</a>       |
| Nomis Official Labour Market Statistics         | Labour market statistics including data on employment, unemployment, qualifications, earnings etc.   | <a href="http://nomisweb.co.uk">Nomis - Official Labour Market Statistics (nomisweb.co.uk)</a>              |
| Economics of the UK Fishing Fleet 2020          | Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.  | <a href="http://www.seafish.org.uk">Economics of the UK Fishing Fleet 2020 — Seafish</a>                    |
| Scotland's Census, National Records of Scotland | Census data that provides information about the characteristics of people and households in the country.   | <a href="http://nrscotland.gov.uk">Scotland's Census   National Records of Scotland (nrscotland.gov.uk)</a> |

|  |  |  |
|--|--|--|
| Scottish Index of Multiple Deprivation     | Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.          | <a href="http://www.gov.scot">Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)</a>              |
| The Green Book                             | HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.  | <a href="http://www.gov.uk">The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)</a> |
| The Magenta Book                           | HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.   | <a href="http://www.gov.uk">The Magenta Book - GOV.UK (www.gov.uk)</a>   |
| Enabling a Natural Capital Approach (ENCA) | Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account. | <a href="http://www.gov.uk">Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)</a>                     |

## Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: [The Green Book: appraisal and evaluation in central government](http://www.gov.uk)

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: [Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects](http://www.iaia.org)

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: [Offshore renewables - social impact: two way conversation with the people of Scotland](http://www.gov.scot)

Best practice guidance for assessing the socio-economic impacts of OWF developments: [Guidance on assessing the socio-economic impacts of offshore wind farms \(OWFs\)](http://www.gov.uk)

[A toolkit of methods available to assist developers, consultants, and researchers carrying out socio-economic impact assessments: Methods Toolkit for Participatory Engagement and Social Research - gov.scot \(www.gov.scot\)](http://www.gov.scot)

# MOD Defence Organisation Response



# Defence Infrastructure Organisation

Your Ref: SCOP-0043  
DIO Ref. DIO10062574

Stefany Alves Veronese  
Ministry of Defence  
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Iain MacDonald  
Marine Licensing and Consenting Casework Officer  
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G2 8LU

06 June 2024

Dear Iain,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (collectively referred to as the "EIA Regulations")**.

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven – Array only.**

Thank you for consulting the Ministry of Defence (MOD) on the above detailed Scoping Opinion in respect of the Bellrock Offshore Wind Farm development. Consultation correspondence was received by this office on 10 April 2024.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

It is acknowledged that, at this time, details of the precise location, dimensions, and configuration of the turbines and associated infrastructure is not available and that a Wind Farm Development Area (WFDA) approach has been adopted for this array project. The components of the project subject to this scoping opinion request will include the following:

- Between 42 and 80 wind turbine generators (WTGs), with floating substructures (FSSs) and (if used) fixed bottom substructures (FBSSs);
- Station keeping systems (SKS) for each FSS, including mooring lines and anchors;
- Inter-array cables (IACs), subsea cable hub(s) and associated cable protection; and

- Scour protection for FSSs and anchoring points, and (if used) FBSSs.

The maximum blade tip height of the wind turbines (metres (m) above Lowest Astronomical Tide (Lat)) is expected to be no greater than 400m, with a maximum rotor diameter of 330m.

I write to confirm the safeguarding position of the MOD on information that should be provided in the Environmental Statement to support any application, this response is based on the Scoping Report dated 22 March 2024 (Document Reference. BFR\_BEL\_CST\_REP\_0003) which recognises some of the principal defence issues that will be of relevance to the progression of the proposed development.

### **Air Defence Radar**

Chapter 12 Aviation and Radar covers Military Aviation. Paragraph 12.4.1.3 (941) references the MOD's Air Defence (AD) Radars.

Wind turbines have been shown to have detrimental effects on the operation of AD radar. These include the desensitisation of the radar in the vicinity of wind turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the locality of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and manage aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

Within paragraph 12.4.4 (968) of Chapter 12 it is stated that the nearest military air defence radar is located at Remote Radio Head (RRH) Buchan which is approximately 117.2km from the closest point of the scoping array.

The MOD has undertaken an assessment based on 80 wind turbines at 400m to tip height using the Rochdale Envelope boundary co-ordinates. Turbines within the array area will be detectable to the AD Radar at RRH Buchan. The impact of the turbines on the AD radar at RRH Buchan will therefore need to be addressed through a suitable technical mitigation solution. It is the applicant's responsibility to provide a suitable technical mitigation solution to the MOD.

### **Air Traffic Control**

Chapter 12 Aviation and Radar covers Military Aviation. Paragraph 12.4.1.3 (941) references the MOD's Air Traffic Control (ATC) Radars.

Within paragraph 12.4.4 (965) of Chapter 12 it is stated that the nearest military airfields are Leuchars Station which is approximately 171.8km to the west-south-west of the Bellrock WFDA and RAF Lossiemouth which is approximately 211.1km to the north-west of the Bellrock WFDA.

This paragraph acknowledges that the Bellrock WFDA will not be visible to the Primary Surveillance Radar (PSR) at both Leuchars Station and RAF Lossiemouth, the MOD agrees with this conclusion.

### **Military Low Flying**

The potential for the development to create physical obstructions to military low flying aircraft activities is acknowledged within Chapter 12 Aviation and Radar, Paragraph 12.5 (978). To mitigate any potential impact, it is common practice that the MOD will request that a Requirement is added to any Development Consent Order that might be issued requiring the submission of information such as commencement dates, maximum turbine heights and the longitude and latitude of each wind turbine. This information is required to allow accurate charting of the development.

Paragraph 12.5.1 (981) acknowledges that the development will adhere to a lighting and marking plan (LMP) which will confirm compliance with legal requirements with regard to shipping, navigation and aviation marking and lighting. The MOD will request that the aviation warning lighting requirements is added as a Requirement to any Development Consent Order that might be issued.

### **Practice and Exercise Areas (PEXA)**

Practice and Exercise Areas also known as PEXA, are designated areas of the sea where military exercises can be undertaken. Chapter 12 Aviation and Radar, Paragraph 12.4.1.3 acknowledges MOD PEXAs. Chapter 13 Marine Infrastructure and Other Users, Paragraph 13.4.6 (1016) states that the scoping array project is not contained within the vertical limits of any military PEXA and, therefore military PEXA is scoped out of the EIA. The MOD agrees with this statement in relation to PEXA.

### **Unexploded Ordnance (UXO)**

The potential for unexploded ordnance (UXO) to be present within the development area and the necessity for clearance should be considered. The potential presence of UXO and disposal sites should be a consideration during the installation and decommissioning of turbines, cables, and any other infrastructure, or where other intrusive works are necessary.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely,

<Redacted>

Stefany Alves Veronese

Assistant Safeguarding Manager

# National Air Traffic Services Response

**From:** [NATS Safeguarding](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 [SG37263]  
**Date:** 10 May 2024 14:22:26  
**Attachments:** [image001.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[SG37263 Bellrock Offshore Wind Farm - TOPA Issue 1.pdf](#)

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Our Ref: SG37263

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG37263.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

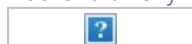
In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully



NATS Safeguarding

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL

[www.nats.co.uk](http://www.nats.co.uk)



NATS Internal

---

**From:** NATS Safeguarding

**Sent:** Tuesday, April 30, 2024 10:43 AM

**To:** MD.MarineRenewables@gov.scot

**Cc:** Rosanne.Dinsdale@gov.scot; Emma.Lees@gov.scot

**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 [SG37263]

Our Ref: SG37263

Dear Sir/ Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams. Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are further obliged to notify both NATS and the Civil Aviation Authority (“CAA”) of that fact (which may lead to the decision made being subject to review whether by the CAA referring the matter for further scrutiny or by appropriate action being taken in the courts).

As this further notification is intended to allow the CAA sufficient time to consider whether further scrutiny is required, we understand that the notification should be provided prior to any granting of permission. You should be aware that a failure to consult NATS, or to take into account NATS’s comments when deciding whether to approve a planning application, could cause serious safety risks for air traffic.

If you have any queries regarding this matter you can contact us using the details as below.

Yours faithfully



NATS Safeguarding

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NATS Internal

---

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)

**Subject:** [EXTERNAL] SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**(collectively referred to as the “EIA Regulations”).**

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding

# Technical and Operational Assessment (TOPA)

For Bellrock Offshore  
Wind Farm Development

NATS ref: SG37263

LPA ref: SCOP-0043

Issue 1

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## Publication History

| Issue | Month/Year | Change Requests and summary |
|-------|------------|-----------------------------|
| 1     | May 2024   | Scoping Request             |

## Document Use

External use: Yes

## Referenced Documents

# 1. Background

## 1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

## 2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

### 3. Application Details

Scottish Government submitted a request for a NATS technical and operational assessment (TOPA) for the development at Bellrock Wind Farm. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

| Boundary Point | Lat     | Long    | East   | North  | Tip Height (m) |
|----------------|---------|---------|--------|--------|----------------|
| A              | 56.7807 | -0.1629 | 512351 | 766962 | 400            |
| B              | 56.7743 | -0.0300 | 520491 | 766475 | 400            |
| C              | 56.8318 | 0.1001  | 528242 | 773110 | 400            |
| D              | 56.8227 | 0.3240  | 541937 | 772542 | 400            |
| E              | 56.8800 | 0.3250  | 541783 | 778923 | 400            |
| F              | 56.9021 | -0.1658 | 511809 | 780466 | 400            |

**Table 1 – Turbine Details**

### 4. Assessments Required

The proposed development falls within the assessment area of the following systems:

| En-route Surv        | Lat     | Long    | nm    | km    | Az (deg) | Type |
|----------------------|---------|---------|-------|-------|----------|------|
| Great Dun Fell Radar | 54.6841 | -2.4509 | 148.0 | 274.1 | 32.4     | CMB  |
| Perwinnes Radar      | 57.2123 | -2.1309 | 67.0  | 124.1 | 106.8    | CMB  |
| En-route Nav         | Lat     | Long    | nm    | km    | Az (deg) | Type |
| None                 |         |         |       |       |          |      |
| En-route AGA         | Lat     | Long    | nm    | km    | Az (deg) | Type |
| None                 |         |         |       |       |          |      |

**Table 2 – Impacted Infrastructure**

## 4.1. En-route RADAR Technical Assessment

### 4.1.1. Predicted Impact on Perwinnes RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

### 4.1.2. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

| Unit or role         | Comment      |
|----------------------|--------------|
| Prestwick Centre ATC | Unacceptable |
| Military ATC         | Unacceptable |
| Aberdeen ATC         | Unacceptable |

*Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.*

## 4.2. En-route Navigational Aid Assessment

### 4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

## 4.3. En-route Radio Communication Assessment

### 4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

## 5. Conclusions

### 5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

## Appendix A – Background RADAR Theory

### Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of  $P_t$  the power density,  $P$ , at a range of  $r$  is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where  $G_t$  is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of  $\sigma$ , this can be treated as if the object re-radiates the pulse with a gain of  $\sigma$  and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area,  $A_e$ , and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where  $G_r$  is the RADAR antenna's receive gain in the direction of the object and  $\lambda$  is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable  $L$

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

## Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can be determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where  $r_t$  and  $r_r$  are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

## Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

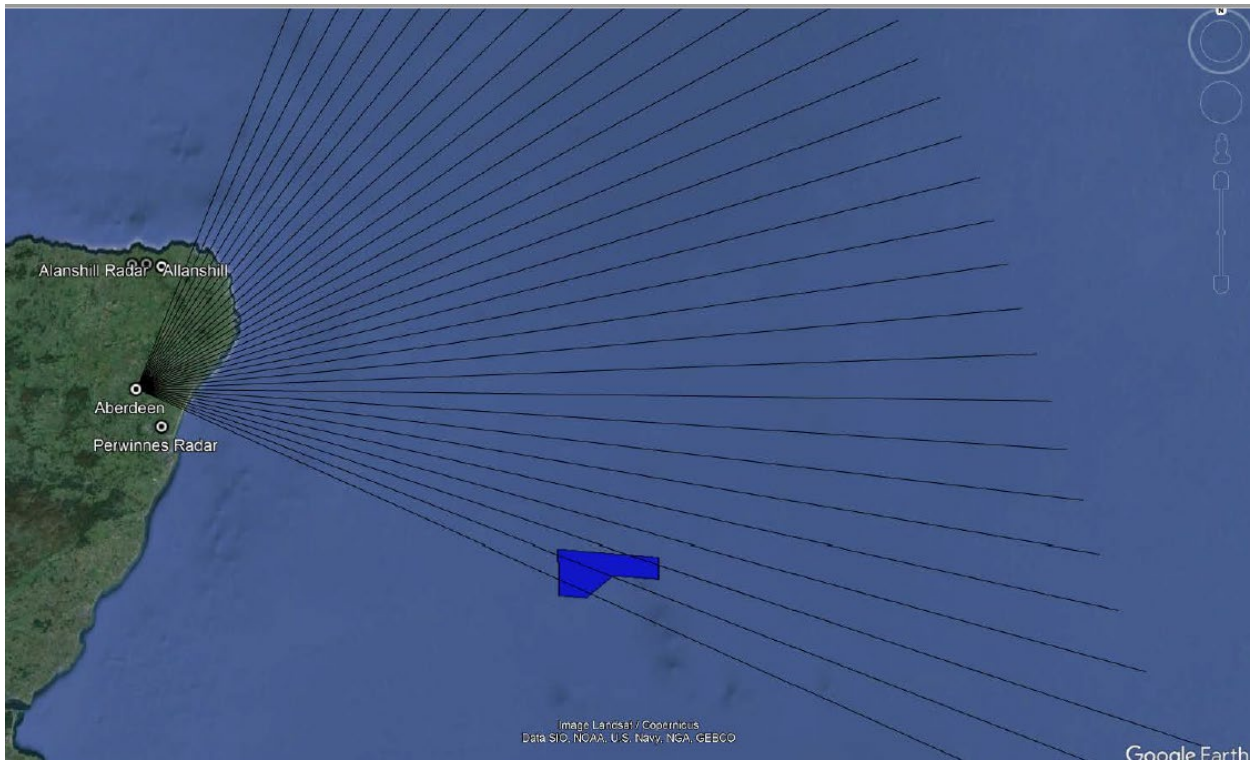
It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

## Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

## Appendix B – Diagrams

Figure 1: Proposed development location shown on an airways chart



# Natural England Response

Date: 03 May 2024  
Our ref: 472484  
Your ref: SCOP-0043



**Licensing Operations Team,**  
**Marine Directorate**  
Scottish Government  
Marine Laboratory  
Aberdeen  
AB11 9DB

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Hampshire Court  
Newcastle-upon-Tyne  
NE4 7YH

T 0300 060 3900

**BY EMAIL ONLY**

Dear Iain

**Environmental Impact Assessment Scoping and Habitats Regulations Assessment  
Screening consultation**

- **Regulation 13 and schedule 4 of the marine works (environmental impact assessment) (scotland) regulations 2007**
- **Regulation 12 of the electricity works (environmental impact assessment) (Scotland) regulations 2017**
- **(collectively referred to as the “EIA Regulations”).**
- **The Conservation Of Habitats And Species Regulations 2017 (referred to as the Habitats Regulations)**

**SCOP-0043 - Bellrock Offshore Wind Farm**

**Location: Scotwind E1E Site** 120km east of Stonehaven

Thank you for seeking our advice on the scope of the Environmental Statement (ES) and HRA screening in your consultation which we received on 10 April 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the application is located in Scottish waters then the advice from NatureScot, the statutory nature conservation body in Scotland should be sought.

We direct the applicant to our guidance on [Environmental considerations for offshore wind and cable projects - Home \(sharepoint.com\)](#). This comprehensively sets out our generic advice for windfarms. We recognise that some of this may be less relevant to Scottish windfarms. We particularly draw the applicant's attention to the sections on Baseline Characterisation Surveys and Data Analysis and Presentation as being of critical relevance to this consultation.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be

---

<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

For the Bellrock Offshore windfarm, Natural England advise that as a minimum, gannet from Flamborough and Filey Coast Special Protection Area (SPA) and Puffin from the Farne Islands SPA are scoped in to the Environmental Statement and HRA. This is due to the windfarm being within the maximum foraging range of these colonies. We do not expect to provide further comments or advice on other receptors unless the project changes substantially.

Please find our generic EIA advice in annex A.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

**Natural England Discretionary Advice Service (DAS)**

We would like to draw the applicant's attention to the opportunity to obtain further advice from Natural England under our Discretionary Advice Service (DAS). The DAS service provides additional non-statutory advice related to development proposals, in order to support sustainable development and achieve better environmental outcomes through the planning system.

Further information including charges and how to proceed with an application can be found at <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

For any queries relating to the specific advice in this letter only please contact me using the details below. For any new consultations, or to provide further information on this consultation please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Ruth Cantrell

Northumbria team Marine Senior Adviser  
E-mail: [ruth.cantrell@naturalengland.org.uk](mailto:ruth.cantrell@naturalengland.org.uk)  
Telephone: <Redacted>

## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 /, of the Marine Works (Environmental Impact Assessment) Regulations 2007 / Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (Regulation 10) sets out the necessary information to assess impacts on the natural environment to be included in an Environmental Statement (ES), specifically:

- A description of the development – including physical characteristics and the full land/marine use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape/seascape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that the responsible authority should provide to assist developers.

#### **2.2 Internationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. Internationally designated sites (e.g. designated Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) fall within the scope of the Conservation of Habitats and Species

Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Further information on the special interest features, their conservation objectives, and any relevant English conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/>

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites, and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

### **2.3 Habitats Regulations Assessment**

If the proposal outlined within the scoping document has the potential to significantly affect features of the internationally designated sites and the activity is not directly connected to the management of any designated site it should be assessed under regulation 63 the Conservation of Species and Habitats Regulations (2017). Should a Likely Significant Effect on an Internationally designated site be identified or be uncertain, the competent authority (e.g. the Marine Management Organisation or Local Planning Authority or Government Department) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

If during the EIA process the potential for a Likely Significant Effect on the conservation objectives of the sites cannot be ruled out the competent authority for the marine licence should undertake an Appropriate Assessment of the implications for the site in view of its conservation objectives. Noting recent case law (People Over Wind<sup>3</sup>) measures intended to avoid and/or reduce the likely harmful effects on a European Site cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site, therefore consideration is required at Appropriate Assessment. Natural England wishes to be consulted on the scope of the Habitats Regulations Assessment and the information that will be produced to support it and should be formally consulted on any Appropriate Assessment provided for the proposal (Regulation 63).

### **3. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the

---

<sup>3</sup> People Over Wind and Sweetman vs Coillte Teoranta (ref: C 323/17).

development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

#### **4. Wind Turbines**

Specific guidance for wind developments has been developed by Natural England and should be used to inform the EIA. [Environmental considerations for offshore wind and cable projects - Home \(sharepoint.com\)](#).

A full consideration of the implications of the whole scheme should be included in the ES. This should include the consideration of the electrical connection within the site and between the proposed substation and the wider grid. All supporting infrastructure should be included within the assessment.

# Natural Resources Wales Response



**Cyfoeth  
Naturiol  
Cymru  
Natural  
Resources  
Wales**

Eich cyf/Your ref: SCOP-0043

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Ffôn/Phone: 0300 065 4332

Licensing Operations Team  
Scottish Government  
Marine Laboratory  
Aberdeen  
AB11 9DB

7<sup>th</sup> May 2024

Dear Iain MacDonald,

## **Marine Licence consultation: Bellrock Offshore Wind Farm - Scotwind E1E Site - Scoping Consultation**

**Application: SCOP-0043**

**Applicant: Bellrock Offshore Wind Farm Limited**

Thank you for your consultation received by Natural Resources Wales Marine Advisory (NRW (A)) on 10<sup>th</sup> April 2024.

We understand that Scottish Ministers have received a request to adopt a scoping opinion, under the EIA regulations, in relation to the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009 for the Bellrock Offshore Windfarm.

Please find our comments below.

### **Documents Submitted**

Environmental Impact Assessment (EIA) Report  
Habitats Regulations Appraisal (HRA) Screening Report

## NRW Advisory Comments

### Marine Ornithology

NRW (A) have reviewed the HRA screening report and note that impact pathways for Skomer, Skokholm, and seas of Pembrokeshire Special Protection Areas (SPA) breeding seabird assemblage and lesser black-backed gull have been screened into the applicant's assessment. NRW (A) note that the applicant has determined that around 4 % of the non-breeding Biologically Defined Minimum Population Scale (BDMPS) seabird assemblage could be impacted by their proposal and therefore, they have scoped this in appropriately. NRW (A) agree with the approach taken and sites screened in and scoped out from a Welsh ornithology perspective, NRW (A) have no further comments to make at this stage.

### Marine Mammals

NRW (A) note that no Welsh Marine Mammal Management Units (MMMUs) cross to the east coast of Scotland, so do not expect any population level effects to be linked to Welsh populations and Special Areas of Conservation (SACs). NRW (A) have no further comments to make at this stage.

Yours sincerely,

<Redacted>

Bridget Randall-Smith  
**Senior Marine Advisory Officer**  
**Marine Area Advice and Management Team**

# NatureScot Response

Iain MacDonald  
Marine Directorate - Licensing Operations Team  
Scottish Government – Marine Laboratory  
Aberdeen  
AB11 9DB

13 May 2024

Our ref: CNS / REN / OSWF / E1 –  
Bellrock – Pre-application

By email only: [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

Dear Iain,

## **BELLROCK OFFSHORE WINDFARM – SCOTWIND E1E**

### **NATURESCOT ADVICE ON THE ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT AND HABITATS REGULATIONS APPRAISAL (HRA) SCREENING REPORT – WIND FARM DEVELOPMENT AREA ONLY.**

Thank you for consulting NatureScot on the EIA Scoping Report and HRA Screening Report submitted by Bellrock Offshore Windfarm Limited for the Bellrock Offshore Wind Farm Development Area, and for granting the short extension to our consultation deadline.

The Bellrock Offshore Wind Farm Development Area (WFDA) is sited approximately 120 km offshore, to the East of Stonehaven, Aberdeenshire. The EIA Scoping Report and HRA Screening Report for the Bellrock WFDA covers the array area only and includes wind turbine generators (WTGs) with associated substructures and station keeping systems, inter-array cables and subsea cable hub(s).

A second development area, defined as the Offshore Transmission Development Area (OfTDA), covers associated offshore grid infrastructure and is to be consulted on separately. Electricity generated from the proposed wind farm is expected to be transmitted from the OfTDA to the planned SSEN transmission offshore substation and wider National Electricity Transmission System.

Our advice on the natural heritage interests to be addressed within the Environmental Impact Assessment Report (EIA Report) and the Report to Inform Appropriate Assessment (RIAA) for the WFDA only is outlined below.

#### **Policy context**

We are currently facing two crises, that of climate change and biodiversity loss and as the Scottish Government's adviser on nature, our work seeks to inspire, enthuse and influence others to manage our

natural resources sustainably. We recognise that this proposal is a lease awarded through the ScotWind process in an area identified in the Sectoral Marine Plan for Offshore Wind.

## Proposal

The Bellrock Wind Farm Development Area is sited approximately 120 km offshore, to the East of Stonehaven (Aberdeenshire). The WFDA covers an area of approximately 280 km<sup>2</sup> with water depths of between 60 to 105 m (from Mean Sea Level, MSL).

The proposal uses a project design envelope<sup>1</sup> approach and comprises of:

- Up to a maximum of 80 wind turbine generators (WTGs) and a minimum of 42 WTGs. Additional WTGs may also be developed for overplanting purposes<sup>2</sup>.
- WTG capacity of at least 15 MW and a maximum 28 MW (overall capability to generate and export approximately 1.2 GW).
- A maximum blade tip height of 400 m (Lowest Astronomical Tide, LAT) and a minimum blade tip clearance of at least 22 m (above Mean High Water Springs (MHWS)).
- Rotor diameter of up to 330 m and WTG spacing of at least 1000 m (in all directions).
- Floating substructure types being considered include tension-leg platform, semi-submersible, barge, buoy (modified spar-buoy) and semi-spar.
- Fixed bottom substructures are also being considered, and includes piled-jacket, suction caisson and cable supported monopile.
- It is noted that more than one substructure type may be utilised, due to varying site conditions across the WFDA.
- For floating substructures, the mooring systems being considered include catenary, taut, semi-taut, tension and shared mooring.
- For floating substructures, a maximum of 12 anchors per floating substructure is proposed. The anchoring systems under consideration include driven pile, suction pile, drilled and grouted pile, drag embedment anchor, vertical load anchor and suction embedded plate anchor.
- For driven pile anchors a design envelope is presented which includes a maximum diameter of 3.5 m (minimum diameter 2 m), a maximum length of 35 m (minimum 20 m) and maximum hammer energy of 3000 kJ (minimum 250 kJ).
- Inter-array cable footprint is yet to be determined. For floating substructures both dynamic inter-array cabling and static inter-array cabling will be used, these are to be joined by a connector to form a continuous cable.
- Ancillary elements for the dynamic inter-array cabling include buoyancy modules, bend stiffeners, bend restrictions, abrasion protection and connector.
- For the static cable protection may be required, this may include burial for which methods may include jet trenching, mechanical trenching, cable ploughing and mass flow excavator. A target burial depth is not provided.
- Where burial is not possible cable protection being considered includes concrete mattresses, rock placement/rock bags, grout bags and cast-iron shells (articulated pipes).
- Clump weights/ballast and tethering anchors may also be required.
- Ancillary cable elements are also being considered, including touchdown protection (sleeves and anchoring), bend stiffeners and buoyancy modules.

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<sup>1</sup> <https://www.gov.scot/publications/guidance-applicants-using-design-envelope-applications-under-section-36-electricity-act-1989/>

<sup>2</sup> It is not clear from Section 1.5, whether overplanting will be additional to the maximum number of WTGs.

- Potential use of Subsea cable hub(s), the number and footprint of which is not provided – it is noted that these will be defined in the EIAR.
- Scour protection being considered includes concrete mattresses, graded rock placement/rock bags, grout bags, and artificial frond mats.
- Proposed operational life of up to 50 years, noting the seabed lease for 60 years.

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 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.

#### *Transmission infrastructure*

A detailed project description is included in Section 3 of the Scoping Report. In addition to the parameters summarised above regarding the project proposal we also note the following points regarding our current understanding of the proposed consent strategy for transmission infrastructure:

- It is our understanding that, although some inter-array cables are included within the WFDA Scoping, transmission infrastructure including offshore substations, interconnector cables and offshore export cables will be covered under the OfTDA (as per Section 3.7).
- From review of Section 1.4 – Consents Strategy, we understand that the Bellrock WFDA and OfTDA will be submitted as separate consent applications. As such, we anticipate that the Scoping Report for the OfTDA will be consulted on separately.
- Cumulative impacts between the Bellrock WFDA and the OfTDA will be considered in the forthcoming EIAR.
- The project is expected to utilise an SSEN Transmission offshore substation. As stated in the Scoping Report Executive Summary (page iv) the infrastructure connecting the SSEN Transmission offshore substation to shore is to be developed by SSEN as part of the National Electricity Transmission System. The location of the SSEN Transmission offshore substation is yet to be determined, as outlined in Section 3.10.1.2. No timeline information is provided.
- As such, we understand that the Export Cable Corridor between the SSEN Transmission and landfall is therefore considered to be a separate project and will not be covered by the forthcoming Scoping Report for OfTDA.

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.

#### **Content of the EIA Scoping Report and HRA Screening Report**

The proposed design envelope is especially broad. This has restricted our ability to provide detailed advice particularly on impact pathways and assessment methods. The Scoping Report, as well as the HRA Stage 1 Screening Report is also only informed by a single year of digital aerial survey data.

A large part of delivering a proportionate EIA Report, taking account of Scottish Government guidance on use of design envelopes, is to ensure that the project components are refined sufficiently to aid

assessment and not result in overly complex scenarios requiring multiple assessments to identify the worst-case and most likely scenarios between and across receptors. Further refinement prior to submission of the EIA Report will be required to avoid the EIA process becoming unmanageable. As the project envelope is refined and the second year of survey data analysed, we strongly recommend that the validity of the Scoping Opinion is reviewed, discussed and agreed with all parties during the pre-application period to ensure that data sources, sites / qualifying features, impact pathways and assessment processes are fit for purpose.

The EIA Scoping Report and HRA Screening Report are well laid out, easy to navigate and read. The use of hyperlinks between sections of the Scoping Report was particularly useful whilst navigating the document.

### **Assessment approach**

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.

We note that some elements within the design envelope consist of novel or innovative technology, not yet deployed in a Scottish offshore wind context. Further discussion will be required during the pre-application period to fully understand such technology, drawing on experience from elsewhere or through other industries to inform consideration of assessment requirements.

#### *Baseline characterisation*

We recommend submission of the baseline characterisation Digital Aerial Survey (DAS) report during the pre-application stage rather than waiting until the application. This will enable any issues to be discussed and resolved in a timely manner.

#### *Ecosystem assessment*

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.

#### *Climate change and carbon costs*

The impact of climate change effects should be considered, both in futureproofing the project design and how certain climate stressors may work in combination with potential effects from the proposed wind farm. The EIA Report should also consider the carbon cost of the wind farm (including supply chain) and to what extent this is offset through the production of green energy. We recognise that some aspects of this are addressed in Section 17 (Climate Change).

#### *Blue carbon*

In addition to the climate change assessments outlined in Section 17 of the EIA Scoping Report, we recommend that consideration is given to impacts on blue carbon and whether or not an assessment can be undertaken. This should expand on the information and assessment conducted for benthic

ecology to focus on the potential impacts of the proposed development on marine sediments and coastal habitats. We recognise that some aspects of this are addressed in Section 17 (Climate Change).

#### *Wet storage*

Section 3.9.3.1 outlines the process for floating substructure 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 floating offshore units 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 Cumulative Effects Assessment.

We are aware that Marine Directorate are currently considering consenting 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.

#### *Cumulative assessment*

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 Cumulative Effects Assessment (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.

#### *Mitigation*

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, and published guidance, are considered and discussed in the EIA Report.

#### **Environmental Impact Assessment Report (EIA Report)**

The 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 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.

### **Habitats Regulations Appraisal (HRA)**

We provide advice to help inform HRA requirements for marine ornithology, marine mammals, benthic subtidal ecology, and diadromous fish in each of the relevant appendices below, noting this is based on a single year of DAS data as discussed above.

Further discussion and agreement will be needed to ensure that all relevant impact pathways are addressed and that the assessments and conclusions presented in the HRA are appropriate once a second year of DAS data is available and the project design envelope is further refined.

### **Natural Heritage Interests Consideration**

We provide advice below within receptor-specific technical appendices for key natural heritage interests to be considered in the EIA Report:

- Advice on benthic ecology is provided in **Appendix A**.
- Advice on fish and shellfish ecology is provided in **Appendix B**. (Noting that for diadromous fish we have limited our advice to the requirements for these to be considered as part of the EIA Report only – further advice is contained within the appendix).
- Advice on marine ornithology is provided in **Appendix C**.
- Advice on marine mammals is provided in **Appendix D**.

For the following receptors, we advise:

- Physical Processes
  - Following the Bellrock Scoping workshop we provided written advice on physical processes (advice issued 20 December 2023). We welcome the acknowledgement of our advice and note the inclusion of reference to points we raised regarding bedform levelling / clearance and scour and loss of seabed within Section 5.6.1.1. We note that further consideration will be detailed within the WFDA EIA Report.
  - With regards to the Scoping questions included in Section 5.8, NatureScot do not currently have in-house expertise regarding physical processes so far offshore (WFDA located approximately 120 km from shore), as such we note that Marine Directorate - Science, Evidence, Data and Digital (MD-SEDD) may wish to provide advice regarding Section 5 of this Scoping Report.
- Seascape, Landscape Character and Visual Impact assessment (SLVIA)
  - Following the Bellrock Scoping workshop we provided written advice on SLVIA (advice issued 20 December 2023). We advised that due to the location of the proposal, the distance to shore, as well as the advice we 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 outwith the array area that may be visible from shore – if this is the case then we advise further consultation.

- We 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”*. We are therefore content that our previous advice remains valid.

### **Positive Effects for Biodiversity / Biodiversity Net Gain**

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 EIA Report. We acknowledge that, whilst not policy in the marine environment, these aspects form part of our ability to address both the climate and biodiversity crises and as such we encourage developers to consider this as part of their application.

### **Further information and advice**

We hope this advice is of assistance to help inform the Scoping Opinion, noting that there will be aspects where further engagement is required to assist in preparing the EIA Report and RIAA.

Please contact me in the first instance for any further advice, using the contact details below and copying to our marine energy mailbox – [marineenergy@nature.scot](mailto:marineenergy@nature.scot).

Yours sincerely,

Clare McCarty

Marine Sustainability Adviser – Sustainable Coasts and Seas

[Clare.McCarty@nature.scot](mailto:Clare.McCarty@nature.scot)

## NATURESCOT ADVICE ON EIA SCOPING REPORT FOR THE BELLROCK OFFSHORE WIND FARM

### APPENDIX A – BENTHIC ECOLOGY

Benthic ecology interests are considered in Section 6 of the Wind Farm Development Area (WFDA) EIA Scoping Report and Section 4 of the HRA Screening Report. Embedded mitigation measures are summarised within the Mitigation Register presented in Appendix 3 of the Scoping Report Appendices.

Scoping questions to consultees have been set out in Section 6.8 of the Scoping Report, within our advice below we have used text boxes to clearly identify these questions.

We note that the final question, included for each receptor, is regarding other matters or information sources - Do you have any other matters or information sources that you wish to present? - we respond to this question within our advice below as presented under appropriate headings. Our advice with respect to the HRA Stage 1 Screening Report is also provided below.

#### Project description

The project description (Section 3 of the Scoping Report) states that refinement of the project design envelope will continue throughout the EIA process. We note that at present the proposed envelope is especially broad. As noted elsewhere in this advice (see cover letter) we recommend that as the project envelope is refined the validity of the Scoping Opinion is reviewed, discussed and agreed with all parties during the pre-application period to ensure that data sources, sites / qualifying features, impact pathways and assessment processes are fit for purpose.

#### Study area

The proposed study area includes a 10 km buffer around the Bellrock WFDA. However, we note that this buffer will be refined based on the distance of one tidal ellipse. We are content with this approach.

#### Baseline characterisation

The existing environment is presented in Section 6.4 and data sources are included in Table 6.3. Site-specific benthic surveys, conducted during 2023, are outlined in Section 6.4.2.1. It is noted that data collected during these surveys will be used to inform the EIA Report.

Do you agree that the information described will be suitable for characterisation of the existing environment?

We are content that the combination of existing data sources and site-specific surveys should provide adequate information to characterise the baseline environment.

Have all the relevant data sources been identified in the Bellrock WFDA Scoping Report?

The data sources listed in Table 6.3 are appropriate and will provide useful contextual information.

In addition to the data sources identified, we also recommend that the Cefas OneBenthic Baseline Tool may also be useful, this tool can be accessed online:

- <https://openscience.cefas.co.uk/>

#### Potential impacts

Have all benthic ecology impacts resulting from the Bellrock WFDA been identified in the Bellrock WFDA Scoping Report?

Section 6.5 identifies potential impacts from the Bellrock WFDA during the construction, operation and maintenance, and decommissioning phases (as summarised in Table 6.6). As outlined in Section 3.9.2

and Section 6.5.1, potential impacts from pre-construction works are to be considered alongside construction phase impacts and will be discussed further within the WFDA EIA Report technical chapters.

We are generally content with the impacts identified in Section 6.5, noting one exception. Section 6.5.1 lists “Introduction of INNS from marine traffic” and Table 6.6 lists “Introduction of INNS from vessel traffic”. We advise the introduction of INNS from any source should be included, not just marine traffic. Other sources may include, for example, floating structures which may be towed into position and/or towed during maintenance activities (if required), and wet storage of floating structures (if required).

Do you agree with the benthic ecology impacts that have been scoped in for/out from further consideration within the Bellrock WFDA EIA Report?

We are content with the impacts scoped in/out as per Section 6.6, with one exception. As discussed above, we advise that Invasive Non-Native Species (INNS) should be scoped in from any source and not just marine traffic. This should be scoped in across pre/construction, operation and decommissioning phases. Although there are mitigation measures (i.e. management plans) which can help reduce the risks, there is still a lot of uncertainty around their effectiveness to reduce the spread of INNS.

The Scoping Report states that it is assumed floating substructures/ floating offshore units will be towed from a UK-based port and not internationally. However, there are INNS present in certain ports around the UK which could pose a risk if transferred elsewhere in UK waters. Moreover, the potential for offshore wind farms to act as stepping stones for INNS should be considered. This should be considered in the EIA Report.

#### **Approach to assessment**

Do you agree with the proposed approach to assessment in the Bellrock WFDA EIA Report?

The proposed approach to impact assessment is outlined in Section 6.7, we are content with the approach for benthic ecology as described in this section.

#### **Cumulative assessment**

Potential cumulative effects are discussed in Section 6.6.3. We note that paragraph 467 states that the CEA for benthic ecology will specifically consider cumulative noise effects, habitat loss and changes to seabed habitat which may be pre-empting findings of the individual assessment.

We advise that the CEA should include all impacts which may arise from the development, and not be limited to the three impacts highlighted in paragraph 467. Furthermore, it should also include any impacts which could be identified as minimal for the individual development but may have impacts when considered cumulatively (such as EMF).

Regarding EMF, we have observed a tendency for wind farm projects to reach a no LSE conclusion for electromagnetic field (EMF) impacts from a cumulative perspective. However, noting the proposed number of offshore wind developments in Scottish waters, we are concerned that the spatial and temporal scale is not being sufficiently considered cumulatively across the network of cables, including those outwith of the proposed development. Thus, we advise that EMF impacts are considered in the cumulative assessment.

#### **Mitigation and monitoring**

The embedded mitigation measures proposed in the Mitigation Register (Appendix 3) include relevant plans and biosecurity measures. We advise that further best practice measures should be considered at the EIA stage.

Where possible, we encourage consideration of collaborating and contributing to strategic monitoring of EMF impacts from cables (for example, through ScotMER), to help build understanding of these poorly understood impacts.

### **Transboundary impacts**

Section 6.6.4 proposes to scope out transboundary benthic effects from further consideration with the EIA Report, this is due to the localised and small-scale nature of impacts on benthic ecology. We are content that transboundary effects can be scoped out for benthic ecology interests.

### **Habitats Regulations Appraisal (HRA) Screening Report**

We agree with the conclusion in the HRA Stage 1 LSE Screening Report (Section 4) that no sites with Annex 1 habitat features need to be taken forward to assessment.

## NATURESCOT ADVICE ON EIA SCOPING REPORT FOR THE BELLROCK OFFSHORE WIND FARM

### APPENDIX B – FISH AND SHELLFISH ECOLOGY

Fish and shellfish ecology interests are considered in Section 7 of the Wind Farm Development Area (WFDA) EIA Scoping Report and Section 5 of the HRA Screening Report. Embedded mitigation measures are summarised within the Mitigation Register presented in Appendix 3 of the Scoping Report Appendices.

Scoping questions to consultees have been set out in Section 7.8 of the Scoping Report, within our advice below we have used text boxes to clearly identify these questions.

We note that the final question, included for each receptor, is regarding other matters or information sources - Do you have any other matters or information sources that you wish to present? - we respond to this question within our advice below as presented under appropriate headings. Our advice with respect to the HRA Stage 1 Screening Report is also provided below.

#### Project description

The project description (Section 3 of the Scoping Report) states that refinement of the project design envelope will continue throughout the EIA process. We note that at present the proposed envelope is especially broad. As noted elsewhere in this advice (see cover letter) we recommend that as the project envelope is refined the validity of the Scoping Opinion is reviewed, discussed and agreed with all parties during the pre-application period to ensure that data sources, sites / qualifying features, impact pathways and assessment processes are fit for purpose.

#### Study area

Two study areas have been defined for fish and shellfish ecology – the International Council for the Exploration of the Sea (ICES) rectangles 42E9 and 42F0 that overlap with the WFDA and the Northern North Sea study area defined by the boundary of the northern North biogeographic region (CP2). The latter provides a wider context for the fish species and populations, used to inform impact assessments over long distances (e.g. underwater noise).

As per our advice issued following the Bellrock Scoping workshop (advice dated 20 December 2023), we are content with this approach assuming that the northern boundary of these ICES rectangles is beyond the maximum tidal excursion to take account of potential impacts from suspended sediments. We note that our previous advice has been acknowledged within Table 7.2 (page 167).

#### Baseline characterisation

Do you agree that the existing data available to describe the fish and shellfish ecology baseline remains sufficient to describe the baseline environment in relation to the Bellrock WFDA?

Table 7.4 provides an overview of the site-specific surveys for the Bellrock WFDA. We note that no specific fish surveys have been conducted. Benthic data will be used to inform the baseline (including Particle Size Analysis to identify herring spawning and sandeel habitat suitability). In addition, eDNA samples have been collected which will provide context to the baseline but will not be used to inform the EIA Report directly. The reasoning for this is unclear.

Aerial surveys are also included in Table 7.4; however, it is unclear how these will be used. We assume aerial surveys are included in Table 7.4 because of relevance to basking shark as well as ornithology and marine mammals.

However, we are content that the desk-based study (noting our additional datasets noted for inclusion under the next scoping question) in conjunction with the benthic sediment analysis will be sufficient to inform the baseline.

Are there any further desktop datasets which you would recommend are included?

The following data sources, which can be found on National Marine Plan interactive (NMPi)<sup>3</sup>, should also be included:

- José M. González-Irusta, Peter J. Wright, Spawning grounds of Atlantic cod (*Gadus morhua*) in the North Sea , *ICES Journal of Marine Science*, Volume 73, Issue 2, January/February 2016, Pages 304–315, <https://doi.org/10.1093/icesjms/fsv180>
- José M. González-Irusta, Peter J. Wright, Spawning grounds of haddock (*Melanogrammus aeglefinus*) in the North Sea and West of Scotland, *Fisheries Research*, Volume 183, November 2016, Pages 180-191, <https://doi.org/10.1016/j.fishres.2016.05.028>
- José M. González-Irusta, Peter J. Wright, Spawning grounds of whiting (*Merlangius merlangus*), *Fisheries Research*, Volume 195, November 2017, Pages 141-151, <https://doi.org/10.1016/j.fishres.2017.07.005>

### Designated sites

Table 7.6 (Section 7.4.5) summarises the designated sites for fish and shellfish species scoped in for further assessment. There are no Special Areas of Conservation (SACs) that overlap with the Bellrock WFDA. We advise that all SACs designated for fish and shellfish species can be scoped out due to the distance from the proposed development – please see further advice under HRA screening with respect to migratory fish.

The Firth of Tay and Eden Estuary SAC is included within Table 7.6; however, it is unclear why this site has been included here and we note that the text included in the column titled ‘Fish and Shellfish Qualifying Features’ appears to be incomplete.

Several Nature Conservation Marine Protected Areas (ncMPA) designated for non-migratory fish and shellfish are also included in Table 7.6, on the basis of a 75 km Zone of Influence to account for a worst-case noise impact range (as outlined in Appendix 2 - NCMPA Screening Report). It is noted on Page 176 that both the East of Gannet and Montrose Fields ncMPA and the Firth of Forth Banks Complex ncMPA are to be screened out of the NCMPA assessment. Furthermore, in Section 1.3.2 of Appendix 2 (paragraph 28) it is stated that NCMPAs designated for fish and shellfish are screened out of further assessment. We are content with the conclusion reached, as outlined in paragraph 27.

The Southern Trench ncMPA is also included in Table 7.6, although not designated for fish or shellfish, these receptors are prey for the designated minke whale feature. Under this reasoning, Table 7.6 notes that the Southern Trench ncMPA has been scoped in for further assessment. Within Table 2.1 of Appendix 2 - NCMPA Screening Report, it is noted that changes to prey availability will not be considered for minke whale in the ncMPA main assessment. We advise that the Southern Trench ncMPA does not need to be considered further in terms of changes in prey availability on the minke whale qualifying feature, due to the distance from the site. Further advice on the Southern Trench ncMPA is provided in Appendix D to our advice.

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<sup>3</sup> <https://marinescotland.atkinsgeospatial.com/nmpi/>

## Potential impacts

Do you agree that all potential impacts have been identified for fish and shellfish ecology?

Section 7.5 identifies potential impacts from the Bellrock WFDA during the construction, operation and maintenance, and decommissioning phases. Potential impacts from pre-construction works may also require consideration alongside construction phase impacts.

Section 7.5.2 lists potential impacts arising during operation and maintenance phases that have been scoped in for further assessment. We are generally content with the potential impacts included for fish and shellfish ecology but note further considerations that should be included within our advice below.

Fish aggregation around the Wind Turbine Generators (WTGs) and other hard structures should also be included for relevant fish species. This would need to be considered with other receptors in mind, e.g. marine mammals and ornithology. We note that fish aggregation is briefly covered in paragraph 530 under “Introduction of Hard Substrate” (Section 7.6.1.2.8), but we wish to flag that if floating WTGs are used, the platforms may still attract fish without necessarily being considered a “hard substrate”.

We note that underwater noise and vibration has been considered across the construction and operation and maintenance phases. There is emerging evidence showing that the movement of mooring and anchoring cables can be noisy. Results from the Hywind and Kincardine demonstrator sites<sup>4</sup> should be considered in the desk-based study.

For the potential impacts during decommissioning in Section 7.5.3, we agree that these would be similar to construction impacts. However, until we better understand the extent to which structures will be decommissioned, it cannot be assumed that the impact will likely be lower.

### *Changes in prey species availability*

Section 7.4.3 recognises that many of the species included within the study area fish assemblage are important prey species for other receptors. We note that the fish and shellfish assessment will also be considered within the marine mammal and offshore ornithology chapters of the EIA Report. In addition, ‘changes to prey availability’ has been included as an impact pathway scoped into the marine mammal assessment (see Table 20.1) and is also included under ‘indirect impacts’ as scoped in for offshore ornithology (see Table 9.5).

Clear links should be made between those assessments and the fish and shellfish assessment. Most EIA Reports concentrate on receptor specific impacts; however, we increasingly need to understand impacts at the ecosystem scale. Therefore, consideration across key trophic levels will enable better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance on marine mammal (and other top predator) interests and how this may influence population level impacts. Consideration of how this loss and or disturbance may affect the recruitment of key prey (fish) species through impacts to important spawning or nursery ground habitats should also be assessed.

In addition, the PrePARED (Predators and Prey Around Renewable Energy Developments) project<sup>5</sup> may be helpful in the understanding of predator-prey relationships in and around offshore wind farms.

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<sup>4</sup> Risch D., Favill G., Marmo B., van Geel N., Benjamins S., Thompson P., Wittich A., and Wilson B. 2023. Characterisation of underwater operational noise of two types of floating offshore wind turbines. Scottish Association for Marine Science, Xi Engineering Consultants, University of Aberdeen.

<sup>5</sup> <https://owecprepared.org/>

Do you agree with the potential impacts scoped in and out?

We are content with the impacts scoped in/out as per Section 7.6.

### **Approach to assessment**

We are generally content with the approach to assessment for fish and shellfish ecology (as outlined in Section 7.7), noting our further comments below.

#### *Priority Marine Features (PMFs)*

Section 7.4.3 and Table 7.7 refer to the presence of numerous PMFs within the fish and shellfish ecology study area. We recommend that the assessment should quantify, where possible, the likely impacts to key fish and shellfish PMFs. It should assess whether these could lead to a significant impact on the national status of the PMFs being considered<sup>6</sup>.

#### *Sensitivity*

For determining sensitivity of species, please note that all Priority Marine Features (PMFs) and some prey fish species are now available on the Feature Activity Sensitivity Tool (FeAST)<sup>7</sup>.

#### *Vessel collision risk*

A qualitative vessel collision risk assessment will be conducted for basking shark using the available sightings data for the east coast of Scotland and the worst-case number of vessel trips expected for the proposed development (as per paragraph 556) – we are content with this approach.

#### *Underwater noise modelling*

Paragraph 559 briefly describes the approach to underwater noise modelling. At this stage, we would have expected to see further detail on the type of response – e.g. which species would be classed as stationary or fleeing. We would recommend that a fleeing response be used for most fish species except where mating or egg laying may override the instinct to flee e.g. for cod or herring. This is also the case for sandeel that have a very distinct habitat preference and unable to find suitable grounds further afield. Additionally, we would expect larvae (sandeel) to also be considered. Further dialogue with respect to underwater noise assessment requirements would be helpful, particularly as the PDE is refined.

As per paragraph 560, particle motion is to be considered qualitatively within the EIA Report. We are currently content with this approach until further research on particle motion is available.

### **Cumulative assessment**

Potential cumulative effects for fish and shellfish are considered in Section 7.6.3. It is stated that the cumulative assessment will be considered in two stages – the Bellrock WFDA with the Bellrock OfTDA and also alongside other plans and projects. We also note that the impact from underwater noise is likely to have the largest Zone of Influence and this will be used to determine whether other plans or projects have the potential to contribute to cumulative impacts - we are content with this approach.

Regarding EMF, we have observed a tendency for wind farm projects to reach a no LSE conclusion for electromagnetic field (EMF) impacts from a cumulative perspective. However, noting the proposed number of offshore wind developments in Scottish waters, we are concerned that the spatial and temporal scale is not being sufficiently considered cumulatively across the network of cables, including

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<sup>6</sup> <https://www.nature.scot/doc/priority-marine-features-guidance>

<sup>7</sup> <https://feature-activity-sensitivity-tool.scot/>

those outwith of the proposed development. Thus, we advise that EMF impacts are considered in the cumulative assessment.

### **Mitigation and monitoring**

We welcome the identification of “embedded mitigation measures” described in Section 7.5.4 and summarised in Appendix 3 (Mitigation Register). The examples provided are generally appropriate, but we note that the majority of the measures do not relate to fish and shellfish directly, instead including the development and adherence to post-consent plans/programmes.

For migratory fish – we advise the need for ongoing consideration of mitigation as the proposal develops. This should include but not be limited to:

- Consideration of underwater noise effects during construction, operation and decommissioning.

### **Transboundary impacts**

We are content that transboundary impacts can be scoped out for fish and shellfish interests.

### **Habitats Regulations Appraisal (HRA) Screening Report**

#### *Migratory fish*

We note that for diadromous fish species there is limited knowledge of distribution and behaviour of these species in the marine environment. For example, the precise migration routes of adult or juvenile Atlantic salmon or direction taken by migrating adult European eels is not fully known. Published information indicates that European smelt and River lamprey are primarily, though probably not exclusively, associated with estuarine environments. Shad might also prefer estuarine environments.

The recently updated ScotMER evidence map<sup>8</sup> process for diadromous fish confirms these evidence gaps, particularly with respect to spatial and temporal distribution as well as uncertainty around migration routes, potential impact pathways and connectivity to protected sites. The ScotMER process is an important vehicle for helping to address these evidence gaps and uncertainties. We specifically welcome the ScotMER project *Diadromous Fish in the Context of Offshore Wind – Review of Current Knowledge & Future Research*, due to be published soon.

This research may change conclusions on how diadromous fish are treated in both EIA and HRA going forward. However, we advise, based on evidence currently available to us, it is not possible for us to carry out an assessment of diadromous fish to the level required under HRA. We therefore advise that diadromous fish species should be assessed through EIA only and not through HRA.

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<sup>8</sup> <https://www.gov.scot/publications/diadromous-fish-specialist-receptor-group/> – published 26 January 2023

## NATURESCOT ADVICE ON EIA SCOPING REPORT FOR THE BELLROCK OFFSHORE WIND FARM

### APPENDIX C – MARINE ORNITHOLOGY

Ornithological interests are considered in Section 9 of the Wind Farm Development Area (WFDA) EIA Scoping Report and Section 7 of the HRA Screening Report. Embedded mitigation measures are summarised within the Mitigation Register presented in Appendix 3 of the Scoping Report Appendices.

We expect the ornithological impact assessment to be based on our published guidance<sup>9</sup>. Any deviation must be discussed and agreed in advance.

Scoping questions to consultees have been set out in Section 9.8 of the Scoping Report, within our advice below we have used text boxes to clearly identify these questions.

We note that the final question, included for each receptor, is regarding other matters or information sources - Do you have any other matters or information sources that you wish to present? - we respond to this question within our advice below as presented under appropriate headings. Our advice with respect to the HRA Stage 1 Screening Report is also provided below.

#### Project description

The project description (Section 3 of the Scoping Report) states that refinement of the project design envelope will continue throughout the EIA process. We note that at present the proposed envelope is especially broad. As noted elsewhere in this advice (see cover letter), we recommend that as the project envelope is refined the validity of the Scoping Opinion is reviewed, discussed and agreed with all parties during the pre-application period to ensure that data sources, sites / qualifying features, impact pathways and assessment processes are fit for purpose.

#### Study area

Two study areas have been defined, as described in Section 9.4.1. We are content with the study areas proposed, which consist of:

- Offshore Regional Study Area – defined by the area within which breeding and non-breeding seabirds could be impacted by the Bellrock WFDA (as described in paragraphs 733 and 734).
- Offshore Aerial Survey Area – defined by the survey area covered by the baseline Digital Aerial Surveys (DAS), which is the WFDA plus a 4 km buffer.

#### Baseline characterisation

##### *Digital Aerial Surveys (DAS)*

Do you agree that the site-specific data that will be available following completion of the two years of offshore aerial surveys will be sufficient to describe the baseline for offshore ornithology?

As per Section 9.4, this scoping exercise been informed by available data from the project's year one aerial survey programme (i.e. for the period between March 2022 and February 2023 inclusive). Providing a full second year of DAS has been completed and the data set covers two full breeding and non-breeding seasons, we anticipate that this will provide a sufficient baseline. If there are any gaps within the survey coverage (e.g. missed dates, surveys flown over multiple days) this will need to be discussed and possible solutions provided.

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<sup>9</sup> <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/renewable-energy/marine-renewables/advice-marine-renewables-development>

Further advice will be provided once the full baseline characterisation report is received. This should follow our advice as per Guidance Note 2<sup>10</sup>, and we recommended this is submitted prior to application so that any issue can be discussed and resolved in advance. Selection of species for detailed assessment should be based on the two full years of survey data.

From our review of the Year 1 DAS Annual Report (March 2022 to February 2023), we highlight the following:

- It would be helpful to understand how comparable the species identification rates are to other developments, especially for auks and terns.
- Over the past couple of years there have been large seabird mortality events, notably the auk wreck along the East Coast of Scotland in 2021 and the ongoing outbreak of HPAI. When comparing the Year 1 DAS findings to the Year 2 findings, any local or regional mortality events information should be considered when interpreting the results.
- The Year 1 DAS report notes there were 274 gannets observed throughout the data collection period and that there were 100 dead birds recorded. It is not clear however if the 100 dead birds observed are part of the 274 gannets seen overall or were additional?

Do you agree that the scope of the offshore aerial surveys (including coverage of the aerial survey areas and transect separation) is acceptable?

The scope of the surveys and survey design are acceptable. Monthly digital aerial surveys were flown from March 2022 until February 2024 covering the development area and a 4km buffer – and previously received the draft Year 1 Annual Report March 2022 to February 2023.

A survey was undertaken each month, with transects 2.5km apart and 12.5% coverage analysed. Flying height was 550m and GSD was 2cm. Identification rates averaged 92%, with unidentified birds apportioned to species level and availability bias was applied for auks. We are content with this approach.

Do you agree with the buffer and transects used for the offshore aerial surveys?

Ideally for a commercial scale development such as the Bellrock project we would expect a 6km buffer to be flown. In this instance we accept 4km.

### **Potential impacts**

Do you agree with the potential impacts that have been scoped in for the construction, operation and maintenance, and decommissioning phases of the Bellrock WFDA in relation to offshore ornithology?

In general, we agree with the potential impacts to be scoped in, as per Section 9.6 and summarised in Table 9.5, however please also consider:

- Disturbance and displacement pathways should include vessel movements between the WFDA and the ports being used in all phases of the project. Vessel movements have the potential to impact various species, including those sensitive to disturbance such as divers and sea ducks. This will depend on the ports used, routes taken and timing. This aspect requires further discussion during pre-application so agreement can be reached on assessment requirements.

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<sup>10</sup> <https://www.nature.scot/doc/guidance-note-2-guidance-support-offshore-wind-applications-advice-marine-ornithology-baseline>

- With respect to nocturnal species, potential impacts from lighting should be considered. Species such as European storm petrel, Leach’s storm-petrel and Manx shearwater may be attracted to and/or disorientated by artificial light sources. As well as turbine lighting, this should also include lighting on servicing or construction vessels, especially if construction will be a 24/7 operation. Such effects could influence assessment of collision and/or displacement. We recommend considering findings from the Marine Directorate commissioned review<sup>11</sup> to inform the assessment of the risk of collision and displacement in petrels and shearwaters from offshore wind developments in Scotland.
- “Wet storage” could also be a significant impact pathway for ornithological receptors depending on the nature and location of activities associated with the construction assembly and maintenance of floating turbines. Agreement will be needed as to how this aspect is dealt with and assessed.

### Approach to assessment

Do you agree with the sources suggested for defining seabird seasons, estimating populations and foraging ranges, and apportioning?

Seasonal definitions are in accordance with our Guidance Note 9<sup>12</sup>. Estimates of breeding seabird population sizes will be obtained from the Seabird Monitoring Programme (SMP) database and should use Seabirds Count data<sup>13</sup>. Non-breeding seabird population sizes will be taken from Furness (2015) - this approach follows our guidance.

For guillemot and razorbill, the population size estimates in the SMP are presented as the number of individuals counted at the colony, and therefore correction factors do need to be applied to the counts. The correction factors have recently been updated and can be found in the new Seabirds Count book<sup>14</sup>. For guillemot the correction factor is now 1.49 and for razorbill it is 1.34.

Foraging ranges are as per our Guidance Note 3<sup>15</sup>.

With respect to apportioning, this will be done through the Cumulative Effects Framework (CEF) in the future. This will incorporate both the 2018 Butler / Marine Directorate commissioned apportioning tool and NatureScot’s theoretical approach as appropriate. The intention is that the CEF will use Seabirds Count data. The developers of the framework, UKCEH, are working with Marine Directorate regarding publication of the CEF, but we have no details on timescale at present.

We have also reviewed Appendix 6 - Apportioning Breeding Season Impacts to SPA Seabird Populations. The breeding season apportionment detailed in Appendix 6 has been based on the four most abundant species in the first year of survey with theoretical connectivity based on foraging ranges. In relation to guillemot, although the assessment outlined follows our guidance, due to the numbers present in the first year of DAS we request a basic assessment of potential impacts is undertaken for guillemot in the

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<sup>11</sup><https://www.gov.scot/publications/review-inform-assessment-risk-collision-displacement-petrels-shearwaters-offshore-wind-developments-scotland/documents/>

<sup>12</sup> <https://www.nature.scot/doc/guidance-note-9-guidance-support-offshore-wind-applications-seasonal-periods-birds-scottish-marine>

<sup>13</sup> Seabirds Count | JNCC - Adviser to Government on Nature Conservation

<sup>14</sup> Seabirds Count - Lynx Nature Books (lynxeds.com)

<sup>15</sup> <https://www.nature.scot/doc/guidance-note-3-guidance-support-offshore-wind-applications-marine-birds-identifying-theoretical>

breeding season using the regional population (such as BDMPS). This list of species should be reviewed when the results from the full two years of survey have been analysed.

Do you agree with the approach outlined for density estimation (recognising the potential issues outlined above with the model-based approach) and the list of seabird species expected to be included for model-based density estimates as based upon the currently available baseline data?

The narrative provided in paragraphs 791 to 795 in Section 9.7.1 which summarises recent use of model versus design-based estimates is helpful. Our guidance on density estimation and the preferred use of MRSea density modelling approaches has not changed, however we acknowledge that issues with number of data points and model fit can sometimes preclude use of this method.

The applicant proposes to use model-based approaches for the impact assessment for the most abundant species (subject to model performance). Design-based density estimates will also be generated for these species as well those species for which sufficient sample size allows. This approach is acceptable on the basis that information is provided in the EIA Report for key species to enable comparison between model-based and design-based estimates for all birds (sitting + flying), sitting birds and as well as flying birds that are within the WFDA plus 4km buffer.

Do you agree with the approach outlined for CRM and with the sources suggested for deriving the seabird parameters to be used in the sCRM (as detailed in Table 9.9)?

The data sources outlined in Section 9.7.6 follow our NatureScot Guidance Note 7. However, as noted during the Scoping workshop, this guidance note is being updated and should be available shortly. Option 3 is no longer required.

With respect to use of a macro-avoidance rate for gannet highlighted in paragraph 810, as discussed during the scoping workshop, we only accept its use for assessment of non-breeding season impacts.

Specifically, in relation to use of the sCRM, can consultees confirm whether clarification will be provided on the following points in the updated version of NatureScot Guidance Note 7:

- Should the same mean avoidance rate be applied to the outputs from the stochastic and deterministic runs of the sCRM for a given species and model option (noting that the values given in Table 1 of Appendix 1 of the existing NatureScot Guidance Note 7 are for use with Band (2012) as opposed to deterministic runs of the sCRM)?
- Should the parameters values identified in Table 9.9 for use with the sCRM be used for both the stochastic and deterministic model runs (noting that the values given in Table 1 of Appendix 1 of the existing NatureScot Guidance Note 7 are for use with Band (2012) as opposed to deterministic runs of the sCRM)?
- Will the same parameter values identified in Table 2 of Appendix 1 of the existing NatureScot Guidance Note 7 as requiring consultation with NatureScot (e.g. nocturnal activity values for several of the key species) continue to require consultation?

The figures presented in Table 1 within Appendix 1 of Guidance Note 7 should be used for the deterministic assessment and the figures presented in Table 2 within Appendix 1 of Guidance Note 7 should be used for the stochastic assessment.

The figures presented in Table 9.9 can be used for both deterministic and stochastic assessments.

Some of the parameter values identified will no longer need to be consulted on as we will present these in our updated guidance note, however, some parameter values will still need to be discussed and agreed.

Do you consider the species-specific displacement rates presented in NatureScot guidance for matrix-based assessments are also appropriate for SeabORD?

The displacement and mortality rates outlined in Table 9.8 (Section 9.7.5) for use in the matrix-based displacement assessment are in line with our guidance.

Do you agree with the sources suggested for deriving demographic rates for species populations to be used in PVA, including the use of colony-specific information (as derived for the Berwick Bank Wind Farm) when considered more appropriate?

Paragraph 813, Section 9.7.7 notes that the use of the 0.02 percentage point change in adult mortality threshold may not be appropriate for some species. This is contrary to our current guidance, and we advise that that this threshold is used for all species.

In line with paragraph 815, Section 9.7.7, we agree the most up to date population data from the SMP database should be used to provide baseline colony population sizes in the PVA. Agreement on use of species demographic data will be required once the JNCC review of Horswill and Robinson (2015) is complete – we expect this to be published shortly. Inclusion of any site-specific data should be discussed and agreed in advance.

Please be aware that we currently advise that collision impacts and distributional response impacts should be additive for kittiwake and gannet. This reflects the best publicly available evidence for considering these species which are susceptible to both impacts. With regards to the work undertaken by Natural England around macro-avoidance for gannet, NatureScot are not currently adopting the full recommendations of this work. We do however accept the output for gannet during the non-breeding season (Pavat et al, 2023<sup>16</sup>).

Do consultees agree the need for further discussion on the implications of the ongoing HPAI outbreak and to agree an approach to incorporate HPAI impacts into the assessment?

There is a need for ongoing engagement in relation to the impacts of HPAI and how to incorporate these impacts within assessments. Work is continuing within NatureScot to provide further information, which we will do when we can. In the meantime, we expect the impact of HPAI on colonies to be considered qualitatively especially when reviewing PVA outputs.

As the DAS survey work straddles the HPAI outbreak years, it will be important for assessment purposes to consider the current status of seabird populations at SPA colonies. Surveys were undertaken in 2023 at various key seabird colonies affected by HPAI, coordinated by RSPB, and some will be repeated in 2024. Recent data for key species at some sites can already be found on the SMP database.

RSPB have just published a report on HPAI effects which will provide helpful context:

- UK seabird colony counts in 2023 following the 2021-22 outbreak of Highly Pathogenic Avian Influenza Research Report 76. RSPB Conservation Science<sup>17</sup>.

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<sup>16</sup> Pavat, D., Harker, A.J., Humphries, G., Keogan, K., Webb, A. and Macleod, K.. 2023. Consideration of avoidance behaviour of northern gannet (*Morus bassanus*) in collision risk modelling for offshore wind farm impact assessments. NECR490. Natural England

<sup>17</sup> <https://www.rspb.org.uk/birds-and-wildlife/seabird-surveys-project-report>

### **Cumulative assessment**

Section 9.6.3 discusses potential cumulative effects assessment (CEA), whereby the cumulative assessment will be considered in two stages covering a CEA of the whole Bellrock project (e.g. Bellrock WFDA and Bellrock OfTDA) and a CEA of the whole project also alongside other plans or projects. We are content with this approach.

As per paragraph 786, we agree that if the Cumulative Effects Framework (CEF) is published within the project timeframe then it should be used to undertake the cumulative assessment. If it is not published, NatureScot are currently preparing guidance on aspects to be considered and presented in the EIA and RIAA.

In addition, we have advised Marine Directorate that the Berwick Bank application will have adverse effects on site integrity (AEoSI) either alone or in-combination for multiple seabird species within The UK European Site Network, some of which overlap with the species and sites assessed in other applications. Consequently, as the outcome of the Berwick Bank application is unknown at present, further advice should be sought from Marine Directorate on which sites and qualifying feature will need to be considered for the in-combination assessment.

### **Mitigation and monitoring**

Do you agree that the examples of potential mitigation measures are appropriate and suitably encapsulate the means to mitigate potential impacts from the Bellrock WFDA on seabird populations?

We welcome the identification of “embedded mitigation measures” described in Section 9.5.1 and summarised in Appendix 3 - Mitigation Register. The examples provided are appropriate, although the list of mitigation measures in this EIA Scoping Report is minimal given the early stage of project development.

No specific monitoring for offshore ornithology is mentioned in the Scoping Report. Further information on proposed ornithological monitoring should be discussed in the EIA Report.

### **Transboundary impacts**

Potential transboundary impacts are briefly described Section 9.6.4. We are content with what is proposed but given the limited information presented, we cannot provide further advice at this stage.

## **HABITATS REGULATIONS APPRAISAL (HRA) SCREENING REPORT**

### **Summary**

In general, the information provided in the HRA Screening Report is appropriate and clearly laid out. However, we have some specific comments outlined below.

### **Connectivity in the breeding season**

We do not recommend the screening out of any sites/features before the data from the full two years of survey work is available, so that a full picture of how birds are interacting with the array footprint is understood.

We note the detailed information provided and conclusions drawn in paragraph 318 in relation to five rarely occurring species and connectivity. We support the statement in paragraph 319 that these conclusions will be subject to review following the completion of the second year of the offshore aerial survey programme.

Table 7.2 lists the relevant qualifying features for each SPA. In various cases, features are only included as components of seabird assemblages when they should be listed as individual features in their own right, e.g. at Buchan Ness to Collieston Coast SPA. This also applies to Table 7.5.

### **Likely Significant Effect (LSE)**

#### *Construction and decommissioning*

The potential effects of lighting on ornithological receptors should be considered as an impact pathway. Species such as European storm petrel, Leach's storm-petrel and Manx shearwater may be attracted to and/or disorientated by artificial light sources. Potential for LSE should be re-considered for these species in relation to this impact pathway depending on results from the second year of DAS.

Paragraph 332 screens in the Outer Firth of Forth and St Andrews Bay marine SPA with respect to the potential for disturbance / displacement impacts from vessel movements between the WFDA and construction and or decommissioning Ports. Paragraph 333 however, screens out all other marine SPAs based on the distance alone. Given the early stage in project development combined with the broad envelope, we are concerned this is premature and advise further consideration may be required.

#### *Operations and maintenance*

As above, the potential effects of lighting on ornithological receptors should be considered as an impact pathway for operations and maintenance. This should include consideration of lighting on arrays and maintenance vessels.

Similarly, we note that our comments above regarding disturbance from vessel movements also apply to the operation and maintenance phase.

### **Summary of Stage 1 – HRA Screening (Table 8.1)**

We note that Table 7.2 (see Section 7.1) identifies breeding seabird qualifying features which are included based on potential connectivity during the non-breeding season only. It would be helpful if Table 8.1 also did this - to add further clarity where it is apparent that the SPA is beyond breeding season foraging range for a particular species. We recommend details such as this are considered in the RIAA to aid consultees in their review.

## NATURESCOT ADVICE ON EIA SCOPING REPORT FOR THE BELLROCK OFFSHORE WIND FARM

### APPENDIX D – MARINE MAMMALS

Marine Mammal interests are considered in Section 8 of the Bellrock Wind Farm Development Area (WFDA) EIA Scoping Report and Section 6 of the HRA Screening Report. Embedded mitigation measures are summarised within the Mitigation Register presented in Appendix 3 of the Scoping Report Appendices. Further details regarding the baseline characterisation are included in Appendix 4 - Marine Mammals Existing Environment, and Appendix 5 contains the Approach to Marine Mammals and Underwater Noise.

Scoping questions to consultees have been set out in Section 8.8 of the Scoping Report, within our advice below we have used text boxes to clearly identify these questions.

We note that the final question, included for each receptor, is regarding other matters or information sources - Do you have any other matters or information sources that you wish to present? - we respond to this question within our advice below as presented under appropriate headings. Our advice with respect to the HRA Stage 1 Screening Report is also provided below.

#### Project description

The project description (Section 3 of the Scoping Report) states that refinement of the project design envelope will continue throughout the EIA process. We note that at present the proposed envelope is especially broad. As noted elsewhere in this advice (see cover letter) we recommend that as the project envelope is refined the validity of the Scoping Opinion is reviewed, discussed and agreed with all parties during the pre-application period to ensure that data sources, sites / qualifying features, impact pathways and assessment processes are fit for purpose.

#### Study area

The study area is discussed in Section 1.1 of Appendix 4 - Marine Mammals Existing Environment and outlined further in Section 1.4 and 1.5. We agree with the Management Units (MUs) listed for each species and advise that the UK portion of the MU should be used in the EIA Report.

#### Baseline characterisation

Do you agree with the proposed data sources? Are there any further data sources to be aware of?

We are content with the proposed data sources and guidance documents, as per Section 1.3 and Table 1.2 of Appendix 4 - Marine Mammals Existing Environment.

We advise the following additional data sources should be included:

- National Marine Fisheries Service. 2018. 2018 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing<sup>18</sup>

Do you agree with the marine mammal species to be scoped in, the reference populations, and the densities to be used for assessments, as presented in Table 8.3?

#### *Species scoped in*

At this stage we are content with the marine mammal species scoped in for further assessment (as per Section 8.4 of the Scoping Report) and agree with the proposal to include other species if they are

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<sup>18</sup> <https://www.fisheries.noaa.gov/resource/document/technical-guidance-assessing-effects-anthropogenic-sound-marine-mammal-hearing>

recorded during site specific surveys. Where species are recorded in low numbers, we advise that the assessment can be qualitative and should include humpback whale.

We welcome the commitment to apply any mitigation measures to all marine mammal species, not just those listed, as stated in paragraph 572.

#### *Reference populations*

For some species, the Inter-Agency Marine Mammal Working Group (IAMMWG) Management Unit(s) (MUs) is very large. For the impact assessment we advise the use of population estimates for the UK portion of the MU, rather than the full MU. The reasoning for this is to try and present the most realistic assessment of the number of animals affected by the potential impact pathway(s). The use of population estimates for the full MUs are still useful for context and baseline characterisation. We advise stating the total MU population and the UK portion for context, and then assessing impacts against the UK portion of the MU.

For species with smaller MUs, such as bottlenose dolphin in the Coastal East Scotland MU, and seals, the entire MU should be used in the assessment.

#### *Density estimates*

A summary of the density estimates to be used in the impact assessment is included in Table 8.3 (Section 8.4.1 of the Scoping Report).

For cetacean species, we agree with the densities presented in Table 8.3.

For seals, we note that in paragraph 574 it is stated that “Seal density estimates will be based on the worst-case densities from the Carter et al., (2022) density mapping (Table 1.4 in Appendix 4), or the site-specific surveys if there is sufficient data.” We do not agree that seal densities from site-specific surveys should be used, as we consider Digital Aerial Surveys (DAS) to be poor at detecting and identifying seals. We therefore advise the use of densities from Carter et al. (2022) alone.

### **Potential impacts**

Do you agree with the impacts to be scoped in during construction?

Section 8.5 identifies potential impacts from the Bellrock WFDA during the construction, operation and maintenance, and decommissioning phases. Potential impacts from pre-construction works may also require consideration alongside construction phase impacts.

We are content with the potential impacts to be scoped in during construction, as discussed in Section 8.6.1 of the Scoping Report.

Do you agree with the impacts to be scoped in during operation and maintenance?

Potential impacts to be scoped in for the operation and maintenance phases are discussed in Section 8.6.1.2. We are generally content with what is proposed, with further comments below.

It is proposed that entanglement is scoped in for the operation and maintenance phase. However, we advise that distinction is required when considering potential impact pathways whether that be secondary entanglement (which is ghost fishing gear being caught on the inter-array cables/mooring lines), or the potential for direct entanglement and/or barrier effects should mooring lines share anchor points (as outlined in Section 3.5.1.5).

We note that EMF effects are to be scoped in, however as there is currently no evidence that marine mammals are sensitive to the direct effects of EMF, we advise that this can be scoped out for marine mammals. However, we advise that indirect effects of EMF, via prey availability, should be scoped in.

Do you agree with the impacts to be scoped in during decommissioning?

At this stage we are generally content with the impacts to be scoped in during decommissioning, as per Section 8.6.1.3. We agree that these are likely to be similar to construction impacts, however welcome the commitment to carry out further assessment in order to take account of information available at the time of decommissioning.

### **Approach to assessment**

Do you agree with the approach to underwater noise modelling, and the thresholds to be used?

We consider the noise modelling approach and the thresholds described for the noise modelling, as described in Section 2 of Appendix 5 - Approach to Marine Mammals and Underwater Noise Modelling, to be appropriate at this stage.

Do you agree with the proposed approaches to assess the potential for disturbance due to underwater noise?

The proposed approach to assessing the potential for disturbance from underwater noise is discussed in Section 2 of Appendix 5 - Approach to Marine Mammals and Underwater Noise Modelling. We are content that the noise modelling approach, and the thresholds described for this modelling, are appropriate at this stage.

### *Sensitivity scoring*

Sensitivity levels for marine mammals is discussed in Section 8.7.2 of the Scoping Report, the approach to receptor sensitivity is also outlined in Section 4.5.3.2 within the Assessment Methodology. Regarding sensitivity scoring, we agree that this should take their ability to tolerate, recover and adapt behaviour to maintain vital rates in response to assessed pressures into account. We also expect sensitivity scoring to take conservation value into account as is the case for the other ecological receptor assessments e.g. ornithology and benthic interests. As such, we welcome the inclusion of value within paragraph 702 and Section 8.7.3 – ecological value and Section 4.5.3.2.

### **Cumulative assessment**

Do you agree with the approach to cumulative assessments, and the use of population modelling?

Section 8.7.6 of the Scoping Report sets out the approach to Cumulative Effects Assessment for marine mammals, this is also discussed in Appendix 5 - Approach to Marine Mammals Underwater Noise Modelling.

In Section 3.2 of Appendix 5, it is stated that iPCoD will be used to assess population level effects “where a potential for a significant disturbance impact is identified” (as summarised in paragraph 717 of the Scoping Report). However, we advise that iPCoD should be used to help determine whether there is significant, long-term disturbance – not the other way around. The applicant has presented a broad project design envelope, the worst-case scenario for which will need to be reviewed as the project develops. If piling is needed, it is likely that we would require use of iPCoD.

### *Determination of significance*

In Section 3.2.1 of Appendix 5, it is proposed that guidance from Natural Resources Wales (NRW) will be used to determine the potential for significant population effects. Please be aware that NatureScot are not currently in a position to adopt this guidance. While we review the NRW guidance and consider its applicability in Scotland, we continue to advise that if a decline is predicted by the population modelling, then the significance of this decline should be considered on a case-by-case, species-by-species basis.

## **Mitigation and monitoring**

We welcome the identification of “embedded mitigation measures” described in Section 8.5.1 (Table 8.4) and summarised in Appendix 3 - Mitigation Register.

Section 8.5.1 states that “additional mitigation may be implemented as appropriate to reduce the potential for effects from underwater noise during geophysical surveys” (paragraph 585). We are aware that geophysical surveys have been conducted for baseline characterisation, however, further surveys are likely to be required pre-construction and also during operation and maintenance. Thus, we would expect geophysical surveys (and appropriate mitigation) to be included in the EIA Report.

No specific monitoring for marine mammals is mentioned in the Scoping Report. Further information on proposed marine mammal monitoring should be discussed in the EIA Report.

## **Transboundary impacts**

Potential transboundary impacts are briefly discussed in Section 8.6.4 and we note that the applicant has acknowledged that impacts from the proposed development could have the potential to affect the transboundary integrity of European sites. At this stage we do not consider it a necessity to consider transboundary effects for marine mammals, provided the assessment is made against the UK marine mammal management units.

## **Nature Conservation Marine Protected Area Screening**

Appendix 2 - Nature Conservation Marine Protected Area Screening, provides an initial screening of ncMPA sites to be taken through to assessment, which will be presented as a standalone report alongside the Bellrock WFDA EIA Report.

### *Southern Trench ncMPA*

The minke whale qualifying feature of the Southern Trench ncMPA is the only feature/site screened in for further assessment in the NCMPA Main Assessment. We are content with this as there may be overlap from noise contours from piling and/or UXO clearance. Until noise modelling is undertaken the distance that sound will propagate is not known.

We note that, alongside potential underwater noise impacts from UXO and substructure installation, ‘Underwater noise and presence of vessels’ and ‘collision risk with vessels’ are also included within Table 2.1 for further consideration within the main assessment. These potential impacts are to be considered across construction, operation and maintenance, and decommissioning phases. We assume that impacts related to vessels are included for further assessment as ports and storage locations are yet to be confirmed - further clarification is required.

Noting the comments above, we consider that all other potential impacts listed in Table 2.1 can be screened out from the Bellrock WFDA NCMPA Main Assessment. For ncMPAs, connectivity is determined if the proposed development has the potential to impact the qualifying feature within the site boundary only.

## **Habitats Regulations Appraisal (HRA) Stage 1 LSE Screening Report**

Marine mammal interests are considered in Section 6 of the HRA Screening Report.

As described in Section 6.1 and summarised in Table 6.3, the initial screening stage has screened out all sites with marine mammal features other than the six closest sites. We are content with this the conclusions presented.

Table 6.2 presents an LSE matrix for sites screened in for further assessment in the Report to Inform Appropriate Assessment (RIAA). We do not agree with the conclusions presented in Table 6.2 and provide further advice below.

#### *Moray Firth SAC*

Bottlenose dolphins from this site are known to travel along the east coast of Scotland, as far south as the north of England. However, they generally stay close to the coast (mainly within the 20m depth contour, which in this region is between 2-20 km from the coast) and are therefore unlikely to encounter any impacts from activities within the WFDA as the export cable is not included in this scoping report. As such, we advise no LSE for this feature of the Moray Firth SAC.

#### *Berwickshire & North Northumberland Coast and Isle of May SAC*

For grey seals, we recommend using a connectivity distance of 20 km. Although grey seals can and do forage considerable distances, the Conservation Objectives for grey seal SACs in Scotland relate to the protection of the breeding colony. During the sensitive breeding time, grey seals (particularly females) do not generally travel further than 20 km from the breeding site. Outside the breeding season the number of grey seals at the site can dramatically decrease. There is evidence to show that grey seals may not forage close to the SAC outside the breeding season and instead can travel to different management units when foraging (Carter *et al.*, 2022). Given the distance of the development location from these SACs, we advise no LSE on the grey seal feature of these sites. As Berwickshire & North Northumberland Coast SAC is a cross-border site, Natural England should also be approached for advice.

#### *Firth of Tay and Eden Estuary SAC*

For harbour seals, we recommend using a connectivity distance of 50 km, as this species does not generally travel further than this from their haul out sites. Given the distance of the WFDA from this site, we advise no LSE on the harbour seal feature of this site.

#### *Southern North Sea and Humber Estuary SAC*

Both of these sites are entirely within English waters and Natural England should be approached for advice on LSE determination for these sites.

# North Coast Regional Inshore Fisheries Group Response

**From:** [Jennifer Mouat](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** Re: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation  
**Date:** 13 May 2024 13:04:01

---

Iain

Thank you for the email. The NECRIFG response has been included in the SFF response. Could you please confirm you have noted that I have responded.

Kindest regards

Jennifer

Sent from my iPhone

On 13 May 2024, at 12:55, MD.MarineRenewables@gov.scot wrote:

Dear Sir/Madam,  
Please note that the consultation period for the above application concluded on the 08 May 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards

Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team,  
Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

<Redacted> | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**

<image001.png>

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---

**From:** MD Marine Renewables

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** MD Marine Renewables <MD.MarineRenewables@gov.scot>

**Cc:** Rosanne Dinsdale <Rosanne.Dinsdale@gov.scot>; Emma Lees  
<Emma.Lees@gov.scot>

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL  
IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

# North Sea Transition Authority Response

**From:** [Stuart Walters \(North Sea Transition Authority\)](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [NSTA Correspondence](#); [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 07 May 2024 09:39:52  
**Attachments:** [image001.png](#)

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Good Morning,

Many thanks for sharing the Bellrock Offshore Windfarm scoping report, below is the NSTA response.

- There are limited considerations from an NSTA perspective given the windfarm lease area does not overlay directly with any infrastructure associated with oil and gas or carbon storage. The Scoping Report has identified the plugged and abandoned wells within the study area and has also identified the other extant oil and gas licences the windfarm does directly overlay. The developer has identified the licensees and states they will be consulted which is important to ensure alignment of any planned or future activity within the licences such as seismic shooting, well drilling or infrastructure development.

Best Regards,

Stuart Walters | Senior Policy Manager – Energy Transition Policy | Telephone: <Redacted>

---

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**(collectively referred to as the “EIA Regulations”).**

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Bellrock Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the

# Northern Lighthouse Board Response



# Northern Lighthouse Board

84 George Street  
Edinburgh EH2 3DA

Tel: 0131 473 3100  
Fax: 0131 220 2093

Website: [www.nlb.org.uk](http://www.nlb.org.uk)  
Email: [enquiries@nlb.org.uk](mailto:enquiries@nlb.org.uk)

Your Ref: SCOP-0043 – Bellrock OWF – Scoping Report  
Our Ref: AL/OPS/ML/WIND\_033\_24

Licensing Operations Team – Marine Directorate  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

18 April 2024

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**  
**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (collectively referred to as the “EIA Regulations”)**

**SCOP-0043 – Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site – Scoping Consultation Request**

Thank you for your e-mail correspondence dated 10<sup>th</sup> April 2024 relating to the Scoping Report submitted by **Bellrock Offshore Wind Farm Ltd** for the proposed Bellrock Offshore Wind Farm, located approximately 120km East of Stonehaven.

Northern Lighthouse Board note the inclusion of Chapter 11 – Shipping and Navigation within the report, and welcome the commitment to develop Post-Consent documentation including a Lighting and Marking Plan (LMP), Development Specification and Layout Plan (DSLPL) and a Navigational Safety Plan (NSP) as embedded mitigations across all phases of the project. NLB will continue to engage with the developer with regard to these documents.

NLB also note the proximity of other offshore wind projects, in particular the adjacent Ossian OWF, and welcome the inclusion of Section 11.6.1 (Potential Cumulative Effects) within the report, considering the cumulative impacts that these developments will have upon shipping and navigation in the area.

NLB respects your privacy and is committed to protecting your personal data.  
To find out more, please see our Privacy Notice at [www.nlb.org.uk/legal-notices/](http://www.nlb.org.uk/legal-notices/)

NLB do request that consideration is given within the EIA to the potential impact that a wreck (either that of a vessel or WTG) could have upon navigation, both within the Bellrock array area and the immediate vicinity.

The above addition aside, NLB have no objection to the content of the Scoping Report.

Yours sincerely

<Redacted>

Peter Douglas  
Navigation Manager

# Northumberland County Council Response



# Northumberland County Council

Scottish Government  
Licensing Operations Team  
Marine Directorate  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Your Ref:  
Our Ref: 24/01244/CNA  
Enquiries to: Kevin Tipple  
Direct Line: 01670 623631  
Email: kevin.tipple@northumberland.gov.uk  
Date: 3 May 2024

Dear Sir or Madam

**Bellrock Offshore Wind Farm  
Environmental Impact Assessment Scoping Report (SCOP-0043)  
Habitats Regulations Appraisal Screening Report**

Thank you for providing Northumberland County Council with an opportunity to comment on the above EIA Scoping Report and Habitats Regulations Appraisal Screening Report.

We have reviewed these documents and have no comments to make.

Yours faithfully

**Kevin Tipple**  
**Senior Planning Officer**



**Rob Murfin, Director of Planning and Housing**  
County Hall, Morpeth, Northumberland, NE61 2EF  
[www.northumberland.gov.uk](http://www.northumberland.gov.uk)



# Royal Society for the Protection of Birds Scotland Response

**From:** [Peter Hearn](#)  
**To:** [Iain Macdonald](#)  
**Cc:** [MD Marine Renewables](#); [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** FW: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 22 May 2024 08:07:49  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Good morning Iain, I hope life is treating you well!

Sincere apologies but, having requested the extension of time to respond to these Scoping and Screening report consultations, we have been unable to find the time needed to consider them in the detail required, so please treat us having made 'nil return'. We really are struggling with capacity at the moment, and there are just too many spinning plates, sorry! We will need to rely on NatureScot to pick up on any issues with these.

Thanks for understanding, and all the best, Peter

Peter Hearn  
Head of Planning and Development  
[peter.hearn@rspb.org.uk](mailto:peter.hearn@rspb.org.uk)  
<Redacted>

The RSPB avocet brand mark



### **RSPB Scotland Headquarters**

2 Lochside View  
Edinburgh Park  
Edinburgh  
EH12 9DH

[rspb.org.uk](http://rspb.org.uk)



---

Protecting habitats, saving species and helping to end the nature and climate emergency.

**Nature is in crisis. Together we can save it.**

---

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

---

**From:** [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot) <[Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)>



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# Royal Yachting Association Response

**19 April 2024**

Iain MacDonald  
Marine Licensing and Consenting Casework Officer  
Licensing operations Team  
Marine Directorate  
Scottish Government  
Marine Laboratory,  
Aberdeen,  
AB11 9DB  
[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

Dear Iain,

### **Bellrock Offshore Windfarm – Scoping Consultation**

I have read the relevant parts of the scoping report on behalf of RYA Scotland and respond to the questions posed as follows:

- *Is the legislation, policy and guidance proposed for consideration as part of the Bellrock WFDA EIA Report (including the NRA) suitable and sufficient? Yes.*
- *Is the shipping and navigation study area defined, data sources considered, and proposed data sources to inform the NRA suitable and sufficient? Yes. As mentioned in the scoping report rather few recreational craft are expected to pass through the area. However, there will be some. I see no need to collect additional data on recreational craft.*
- *Is the methodology outlined for undertaking the risk assessment suitable, including on a cumulative level? Yes.*
- *Have all potential hazards (impacts) due to the presence of the Bellrock WFDA been identified for shipping and navigation users? The hazards listed are appropriate. Experience with other wind farms shows that there is an additional risk from the loss of Aids to Navigation due to storm damage and the difficulty of repairing them timeously. This is particularly relevant in the pre-construction phase when there may be metocean and other buoys deployed.*

▪ *Are the mitigation measures described suitable and sufficient for managing and mitigating risk associated with the potential hazards?* Note that there can be a considerable lag between information on the location of the scheme being sent to the UKHO and it being available on the electronic charts used by recreational boaters.

▪ *Do you have any other matters or information sources that you wish to present?* We in RYA Scotland will work with our colleagues in the Cruising Association on the Navigational Risk Assessment.

Yours sincerely,

<Redacted>

Dr G. Russell FCIEEM(retd) FRMetS  
Planning and Environment Officer, RYA Scotland

# Scottish and Southern Electricity Networks Response

**From:** [Watson, Peter](#)  
**To:** [Transmission Asset Management \(SSE\); MD Marine Renewables](#)  
**Cc:** [MacDonald, Kevin](#); [Gatward, Iain](#)  
**Subject:** RE: TPE-24-122 [EXTERNAL] RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation  
**Date:** 14 May 2024 15:24:02  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Dear Iain,

This consultation unfortunately fell through the gaps in our email system. Would it be possible to extend the consultation as the Bellrock project interacts with three of our development projects. We are in regular contact with the developers of Bellrock however we would welcome an opportunity to respond to the consultation.

Regards

Pete

**Peter Watson** | Lead Marine Consents Manager

SSEN Transmission

10 Henderson Rd, Inverness, IV1 1SN

**E:** [peter.watson@sse.com](mailto:peter.watson@sse.com)

[ssen.co.uk](http://ssen.co.uk)

*Please note my working days are Monday – Thursday.*



---

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Monday, May 13, 2024 12:55 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); Lees, Emma <[Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)>

**Subject:** TPE-24-122 [EXTERNAL] RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 08 May 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards

Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

<Redacted> | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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**From:** MD Marine Renewables

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** MD Marine Renewables <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Cc:** Rosanne Dinsdale <[Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot)>; Emma Lees <[Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)>

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**(collectively referred to as the “EIA Regulations”).**

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Bellrock Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Bellrock Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **08 May 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

**Please be advised that this consultation request relates to the proposed section 36 consent**

**and marine licence application for the array area only and not the export cable corridor or onshore elements of the works.**

Yours faithfully,  
Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

M: Redacted | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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[www.ssen.co.uk](http://www.ssen.co.uk)

# Scottish Borders Council Response

**From:** [Shearer, Scott](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Emma Lees](#); [Rosanne Dinsdale](#)  
**Subject:** [OFFICIAL] FW: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation  
**Date:** 13 May 2024 14:30:38  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.jpg](#)  
[image004.png](#)

Dear Iain,  
Apologies that Scottish Borders Council have not been able to respond within the original time period due to other work streams. Thank you for the reminder, I can confirm that Scottish Borders Council has no observations to raise in response to the proposed Bellrock Offshore Wind Farm and we do not consider that we will have any future observations to raised in a response to this proposal.  
I trust that this clarifies our position.

Kind regards,  
Scott  
Scott Shearer  
Principal Planning Officer (Local Review and Major Development)  
Planning Housing and Related Services  
Scottish Borders Council  
tel: 01835 826732  
e-mail: [sshearer@scotborders.gov.uk](mailto:sshearer@scotborders.gov.uk)



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**From:** Planning & Regulatory Services <[prs@scotborders.gov.uk](mailto:prs@scotborders.gov.uk)>  
**Sent:** Monday, May 13, 2024 2:20 PM  
**To:** Shearer, Scott <[sshearer@scotborders.gov.uk](mailto:sshearer@scotborders.gov.uk)>  
**Subject:** FW: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation

Received in PRS mailbox

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>  
**Sent:** Monday, May 13, 2024 12:55 PM  
**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)  
**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024 - End of Consultation

CAUTION: External Email

Dear Sir/Madam,  
Please note that the consultation period for the above application concluded on the 08 May 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards

Iain

Iain MacDonald

Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

<Redacted> | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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**From:** MD Marine Renewables  
**Sent:** Wednesday, April 10, 2024 4:57 PM  
**To:** MD Marine Renewables <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>  
**Cc:** Rosanne Dinsdale <[Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot)>; Emma Lees <[Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)>  
**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007  
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
(collectively referred to as the “EIA Regulations”).**

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Bellrock Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Bellrock Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **08 May 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

**Please be advised that this consultation request relates to the proposed section 36 consent and marine licence application for the array area only and not the export cable corridor or onshore elements of the works.**

Yours faithfully,

Iain

**Iain MacDonald**

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

M: **Redacted** | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**



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\*\*\*\*\*

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\*\*\*\*\*

# Scottish Environment Protection Agency Response

**From:** [Planning.North](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** PCS-20001216 SEPA Response to SCOP-0043  
**Date:** 02 May 2024 14:43:32  
**Attachments:** [image.png](#)

---

To Whom It May Concern,

SCOP-0043

Bellrock Offshore Wind Farm

Approximately 120km East of Stonehaven

Thank you for the above consultation. We have no comments to make on this EIA scoping request as works which are purely within the marine environment, including at any stage of EIA, fall below our consultation thresholds. Please refer to SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations which is available [here](#). In addition, please refer to our standing advice and other guidance which is available on our [website](#).

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,

Barbara Olszowy

Planning Officer



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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an chois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu [postmaster@sepa.org.uk](mailto:postmaster@sepa.org.uk). Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lanraig a Tuath, ML1

# Scottish Fishermen's Federation Response



Our Ref: FH-Brk-WFDA/24-0001

Your Ref: SCOP-0043

E-mail:

[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

08 May 2024

Dear Ian MacDonald

Scottish Fishermen'  
Federation  
24 Rubislaw Terrace  
Aberdeen, AB10 1XE  
Scotland UK

T: +44 (0) 1224 646944

E: [sff@sff.co.uk](mailto:sff@sff.co.uk)

[www.sff.co.uk](http://www.sff.co.uk)

### **SFF Response on Bellrock Wind Farm Development Area EIA Scoping Consultation**

This response to the scoping request is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The chair of NECRIFG has also been consulted and agrees.

#### **General comments**

SFF note from section 3.2 of the Bellrock WFDA Scoping Report (SR) that a parameter-based Project Design Envelop (PDE) approach (also known as the 'Rochdale Envelope') will be adopted for the Environmental Impact Assessment (EIA) Report. Therefore, the following comments are based on existing details provided in this Scoping Report and further comments will be shared in due course once the Project's designed is finalised.

#### **Specific comments**

##### **Wind Turbine Generator (WTGs) foundation/spatial footprint**

SFF notes from section 3.4 'Wind Turbine Generator Substructure' (p35) of the SR that depending on the water depth (which is from c.66 to 105m) seabed conditions, and other factors, the Bellrock WFDA will use both floating (namely, TLP, semi-submersible, buoy, semi-spar and barge) and fixed foundations designs would be considered in the EIA.

Members:

Anglo Scottish Fishermen's Association · Fife Fishermen's Association · Fishing Vessel Agents & Owners Association (Scotland) Ltd ·  
Mallaig & North-West Fishermen's Association Ltd · Orkney Fisheries Association · Scottish Pelagic Fishermen's Association Ltd ·  
The Scottish White Fish Producers' Association Ltd · Shetland Fishermen's Association

VAT Reg No: 605 096 748

Being concerned of the spatial footprint of floating WTGs and the potential snagging hazard that their moorings system creates to fishing vessels, SFF would propose to the Applicant to use the fixed foundation design (with lesser spatial footprint) for as much WTGs as possible, as a fixed foundation wind farm in a water depth of Greater than 70meters is planned for another offshore wind development in Scottish waters.

Where use of fixed foundation WTGs is not feasible due to technical issues, in such situations, SFF's first preferred WTG floating foundation option is TLP, and buoy to be the second preferred option since they have lesser spatial footprint on seabed. For the same reasons, SFF's preferred mooring system is 'tension mooring' as defined under sub-section 3.4.1.1 (p39) of the SR.

The SFF object to the use of a shared mooring system as it would deem the floating section of the array a no take zone for fishing to continue post construction. 3.5.1.5

### **Inter-Array Cable (IAC)**

SFF notes from section 3.7.1 (p57) that for Floating Substructures (FSSs), due to the nature (and movement) of the structure, static IAC (on the seabed) and dynamic IAC (moving within the water column) are required, joined together by a connector to form one continuous cable. The dynamic IAC section is designed to accommodate the dynamic movement of the FSS. Dynamic IACs sections can be deployed in various configurations that may include: ▪ Free hanging; ▪ Lazy "S" wave; and ▪ Steep wave.

Considering the footprint of the dynamic IACs sections, SFF's preferred configuration is free hanging vs other two.

### **Cable Burial and Protection**

SFF notes from section 3.7.2 that static sections of IAC cable may be surface laid or buried. Being concerned of fishermen's safety, first of all, SFF would suggest to the Applicants to make all efforts to reach the required depth of cable burial and avoid using cable protection measures as much as possible since the volume of cable protection mass will disrupt the marine habitat and would create snagging hazard for fishing vessels within array area.

In terms of using cable protections, SFF is opposed to using concrete mattresses and rock bags in open water since they create severe snagging hazards for bottom trawl fishing vessels and static gears. SFF's preferred cable protection measure is rock dump/protection considering industry standard rock size (1"- 5") with a 1:3 profile followed by an overtrawl sweep alongside a long-term monitoring programme. We do not object to use of sandbags in cable protection works as long as their size is not significant to create snagging hazard for fishing vessels.

In terms of crossing point, as they create obstacles and snagging hazard to the fishing industry, SFF would suggest that the cable crossing should be avoided as much as possible otherwise the design of cables and pipelines crossing points should be consulted with fishing industry to ensure their impacts are mitigated.

### **Pre-construction Works -Boulder Clearance**

SFF notes from section 3.9.2 (p66) that Bellrock WFDA, pre-construction activities include boulder clearance. Since the relocation of boulders from their natural positions and re-positioning them on new surface causes snagging hazard for fishing vessels, SFF would suggest avoiding the relocation of boulders as much as possible. However, where boulders relocation is unavoidable, we recommend the new locations/coordinates of the relocated boulders should be recorded and

shared with fishermen. Fishermen require geographical readings to decimal of a minute format (3 decimal places sufficient) rather than going down to actual seconds and the datum should be WGS84 rather than ED50.

### **Decommissioning**

SFF notes from section 3.9.5 (p69), of the SR that the developer is required under Section 105 of the Energy Act 2004 to prepare a Decommissioning Programme for approval by Scottish Ministers. Specific details on the decommissioning activities are not known at this stage of consent but further details will be provided in the Bellrock WFDA EIA Report.

To reiterate safety concern of the fishing vessels, SFF would like to see all development related infrastructures are recovered/removed to shore followed by over-trawl sweeps (seabed sweeps using fishing gears). The seabed is restored to its pre-development condition post-decommissioning, and it is safe for fishing operations to fully resume in the area.

## **Ch. 6 Benthic Ecology**

### **6.8 Scoping Questions**

Following are the SFF's response on the relevant scoping questions:

**Question:** Have all benthic ecology impacts resulting from the Bellrock WFDA been identified in the Bellrock WFDA Scoping Report?

**SFF's answer:**

SFF would like to see the 'Impacts to benthic invertebrates due to thermal emissions from subsea electrical cables' to also be scoped in since any temperature change in the invertebrate's habitat would have adverse effects on their behaviour and increase their mortality rate.

## **Ch. 7. Fish and Shellfish Ecology**

### **7.8 Scoping Questions**

**Question:** Do you agree with the potential impacts scoped in and out?

**SFF's response:**

SFF is not content with scoping out the "Accidental release of pollutants" because if a vessel was to sink during any of the phases of the project life-span then an accidental release of pollutants would happen. Therefore, we would propose the 'accidental release of pollutants' to be scoped in.

## **Ch. 10. Commercial Fisheries**

### **13. Scoping Questions**

**Question:** Do you agree with the data sources to be used to characterise the commercial fisheries baseline within the Bellrock WFDA EIA Report?

**SFF's response:**

SFF want to see the pre-Brexit data to be used for the EIA Report to present a realistic baseline of the fishing activities within the study area.

**Question:** Are there any additional data sources or guidance documents that should be considered?

**SFF's response:**

In general collection of fishing plotter data from the fisheries organisations, and in specific data from smaller vessels that are not legally liable to use AIS or VMS is recommended.

**Question:** Do you agree that the embedded mitigation measures described provide a suitable means for managing and mitigating the potential effects of the Bellrock WFDA on commercial fisheries receptors?

**SFF's response:**

SFF has the following comments on the proposed embedded mitigation:

- We would appreciate the inclusion of 'the Fisheries Management and Mitigation Strategy (FMMS)' to be developed and adopted pre-consent in consultation with fishing industry to ensure all fishing industry's concerns are considered and addressed accordingly.
- In relation to 'Development of and adherence to a Navigational Safety Plan (NSP), that will include Notice to Mariners (via Kingfisher Bulletins or other appropriate methods)'. We suggest the NtM are issued in sufficient time to avoid any disruptions to the fishing activities in the intended area.

We would propose the following mitigation measures to be considered:

- As part of the proposed commitments, there is no measure for disruption payments for the fishing vessels. SFF suggest that the cooperation agreement should be considered for both the static and mobile gears where they are required to be relocated, or the impact is deemed to be significant.
- Utilise the services of an O.F.L.O with sufficient knowledge of fisheries and fishers that utilise the development area.
- No mention has been made to mitigation once operational and loss of fishing opportunities to the fishing industry within the floating section of the proposed array.

**Question:** Do you agree with the scoping in and out of impact pathways in relation to commercial fisheries?

**SFF's response:**

No. Following points to be considered:

- SFF notes from the Table 10.4 (p306) that 'Physical presence of infrastructure and potential exposure of that infrastructure leading to gear snagging' has been scoped in. We agree with this being scoped in; however, since snagging in some limited cases has human casualties, we propose that the possibility of a loss of life should also be highlighted as to a risk of snagging hazards not just to fishing gear.
- SFF notes from section '10.6.2 Potential Impacts Scoped Out', Table 10.5 that the "Additional steaming to alternative fishing grounds for vessels that would otherwise cross through the Bellrock WFDA" during the operation and maintenance has been scoped out. SFF would like to see the above point is scoped in since it would have an impact of steaming times to and from port notwithstanding if shifting to different fishing grounds during a trip, prior to these being in place a vessel could fish uninterrupted to new grounds, with these in place they will have to detour.

## **Ch. 11. Shipping and Navigation**

### **14.9 Scoping Questions**

**Question:** Have all potential hazards (impacts) due to the presence of the Bellrock WFDA been identified for shipping and navigation users? /Do you have any other matters or information sources that you wish to present?

**SFF's response:**

SFF notes from Table 11.4: that "Creation of vessel to structure allision risk" and "Loss of station-should a SKS failure occur, a floating structure may lose station and become a floating hazard to passing vessels", have been scoped out for construction and decommissioning stages.

We agree that there will be no risk of vessel to structure allision and loss of station pre-construction and post-decommissioning; however, when a number of WTGs have been installed or in case of decommissioning, when all WTGs and related infrastructures not yet removed, the risks of vessels to structure allision and 'loss of station' risk to other users of the sea exist/is imperative. Therefore, we propose the above two points to be also scoped in for construction and decommissioning phases.

In conclusion, SFF stresses that our primary concern is protecting the rights of fishermen to safely undertake their trade, and this is the cornerstone of our response. Our position is that fishing activities should continue unaffected and unharmed post-development. If fishermen impacted are to be denied the right to earn their living, we could not support the development of any proposal for a windfarm.

Best regards

Mohammad Fahim Hashimi  
**Offshore Energy Policy Manager**  
**Scottish Fishermen's Federation**

# Sports Scotland Response

**From:** [Gillian Kyle](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 18 April 2024 11:17:34  
**Attachments:** [image001.png](#)

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Confirming 'nil return' in respect of the below consultation.

Thanks, Gillian

---

**Gillian Kyle** | Planner | [sportsotland](#)  
Doges | Templeton on the Green | 62 Templeton Street | Glasgow | G40 1DA

t: <Redacted>

w: [www.sportsotland.org.uk](http://www.sportsotland.org.uk)

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**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Emma.Lees@gov.scot](mailto:Emma.Lees@gov.scot)

**Subject:** [EXTERNAL] SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

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Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**(collectively referred to as the “EIA Regulations”).**

**SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Approximately 120km East of Stonehaven**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence application under the Marine and Coastal Access Act 2009, Bellrock Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Bellrock Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence application, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

# Transport Scotland Advice Response

Iain MacDonald  
Scottish Government  
Marine Laboratory  
Aberdeen  
AB11 9DB

Your ref:  
SCOP-0043

Our ref:  
GB01T19K05

Date:  
03/05/2024

[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

Dear Sirs,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**SCOP-0043 - BELLROCK OFFSHORE WIND FARM LIMITED – BELLROCK OFFSHORE WIND FARM – SCOTWIND E1E SITE - APPROXIMATELY 120KM EAST OF STONEHAVEN**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Royal HaskoningDHV in support of the above development.

This information has been passed to SYSTRA Limited (SYSTRA) for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

**Proposed Development**

The Bellrock Wind Farm Development Area (WFDA) will comprise a minimum of 42 and a maximum of 80 wind turbine generators (WTGs) located approximately 120km east of Stonehaven and 116km southeast of Peterhead. The nearest trunk road to the site is the A90(T) at Stonehaven.

**Assessment of Environmental Impacts**

The Bellrock Project only includes offshore works and, as such, the SR only considers potential offshore impacts. No mention is made within the SR of any assessment of potential onshore Transport Impacts. We note, however, that construction of the WFDA will involve the towing of components to the WFDA from an assembly port or a wet storage location.

On the assumption that components will travel to the assembly ports by road, Transport Scotland would seek assurance that a separate Onshore EIA will be prepared which will consider all activities associated with the onshore aspects of the WFDA, extending landwards from MLWS. This should include an assessment of the potential impacts of increased traffic associated with construction and the transportation of staff/ components to the assembly ports.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office can assist on 0141 343 9636.

Yours faithfully

<Redacted>

**Iain Clement**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

# UK Chamber of Shipping Response

**From:** [Robert Merrylees](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Emma Lees](#)  
**Subject:** RE: SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024  
**Date:** 15 April 2024 17:56:08  
**Attachments:** [image002.jpg](#)  
[image003.gif](#)  
[image004.png](#)

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Dear Marine Renewables Team,

The UK Chamber of Shipping welcomes the consultation on the Scoping Report for Bellrock WFDA. The Chamber has limited its review and response to that Chapter 11 – Shipping and Navigation, and responded to the questions posed.

- **Is the legislation, policy and guidance proposed for consideration as part of the Bellrock WFDA EIA Report (including the NRA) suitable and sufficient?**

*It is as expected for such a development.*

- **Is the shipping and navigation study area defined, data sources considered, and proposed data sources to inform the NRA suitable and sufficient?**

*The Chamber agrees with the study area of 10nm as industry standard, however would like to see a cumulative routeing study area of 50nm for the cumulative assessment. This is again industry standard for such projects.*

*AIS data as expected and in accordance with MGN 654. The Chamber welcomes the use of a full 12-months of AIS only data for seasonality. The Chamber expects this will be 2023 data but welcomes confirmation.*

*The Chamber expects to see a 20 – year time period for MAIB and RNLI accident data analysis. The data is available, its analysis has become the norm and provides for enhanced analysis given the long lifespan of the wind farm.*

- **Is the methodology outlined for undertaking the risk assessment suitable, including on a cumulative level?**

*As standard, accepted.*

- **Have all potential hazards (impacts) due to the presence of the Bellrock WFDA been identified for shipping and navigation users?**

*The Chamber believes that should the applicant proceed with floating turbines then loss of station of a turbine should be considered during the construction and decommissioning phases, in particular when the structures are in transit or under tow.*

*In addition, should the development use floating turbines then wet storage areas need to be considered from a navigational risk perspective, including loss of station from a wet storage area as well as displacement of vessels from areas that may typically be used for anchoring activity.*

*The Chamber considers given the specific characteristics of a floating development there are some nuanced differences and additional things to consider. For example, the Lighting and Marking Plan (LMP), need to consider the removal of one or more lit*

turbines on the boundary for maintenance or repair and how lighting and marking will be managed in such an occurrence.

- **Are the mitigation measures described suitable and sufficient for managing and mitigating risk associated with the potential hazards?**

As standard, accepted.

- **Do you have any other matters or information sources that you wish to present?**

The Chamber recommends the project fully consider the additional risk factors associated with floating offshore wind projects out with those for fixed projects. The risk consultants NASH Maritime produced such a report for ORE Catapult, of which the freely available version is accessible via: <https://www.nashmaritime.com/news/floating-offshore-wind-navigational-planning-and-risk-assessment>

The Chamber would be happy to provide further detail or rationale to any of the above and looks forward to direct engagement with the developer following Scoping.

Yours faithfully,

Robert

**Robert Merrylees**

Policy Manager (Safety & Nautical) & Analyst

**UK Chamber of Shipping**

30 Park Street, London, SE1 9EQ

DD +44 (0) 20 7417 2843

<Redacted>

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**From:** MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>

**Sent:** Wednesday, April 10, 2024 4:57 PM

**To:** MD.MarineRenewables@gov.scot

**Cc:** Rosanne.Dinsdale@gov.scot; Emma.Lees@gov.scot

**Subject:** SCOP-0043 - Bellrock Offshore Wind Farm Limited – Bellrock Offshore Wind Farm – Scotwind E1E Site - Scoping Consultation - Response Required by 08 May 2024

Dear Sir/Madam,

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)**