Bellrock Offshore Wind Farm

Wind Farm Development Area

Environmental Impact Assessment Report - Volume IV

Appendix 4.1: Consultations Undertaken Relating to the Bellrock WFDA Project Description

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Revision History

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Glossary of Terminology

Term	Definition
Applicant	Bellrock Offshore Wind Farm Limited, the legal entity submitting Section 36 consent and Marine Licence applications for the Bellrock Wind Farm Development Area.
Assembly port	A port at which floating substructures are assembled.
Bellrock Offshore Wind Farm (or the Bellrock Project)	An offshore wind farm capable of exporting up to 1.8 GW of renewable energy to the National Electricity Transmission System. The Wind Farm Development Area is located 120 km east of Stonehaven, and will connect to the National Electricity Transmission System at the proposed Scottish and Southern Electricity Networks Transmission Hurlie substation, west of Stonehaven in Aberdeenshire. The Bellrock Offshore Wind Farm comprises of the following Development Areas: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Cable protection	Protective measure to minimise the effects of scour and hazards along the inter-array cables, and protecting these cables at infrastructure crossing points.
Commencement of construction	Commencement of construction to install the Wind Farm Infrastructure as authorised by the Wind Farm Development Area Section 36 consent and Marine Licence (excluding site preparation works), being the earlier of: ▪ Intrusive pre-installation surveys; ▪ Placement on or installation in the seabed of anchors and associated scour protection, and mooring lines; ▪ Trench excavation for inter-array cables; or ▪ Trenching for, or laying of inter-array cables on or in the seabed.
Connector	Joint between a dynamic inter-array cable and a static inter-array cable.
Construction works	Works to install the Wind Farm Infrastructure as authorised by the Wind Farm Development Area Section 36 Consent/Marine Licence, such as: ▪ Site preparation works undertaken after commencement of construction; ▪ Pre-installation surveys (intrusive and/or non-intrusive); ▪ Placement on or installation in the seabed of anchors and associated scour protection, and mooring lines, and associated scour protection; ▪ Towing or transportation of the floating offshore unit to the Wind Farm Development Area from a port or wet storage facility; ▪ Floating offshore unit installation and commissioning, including hooking-up to the pre-installed mooring system; ▪ Trench excavation for inter-array cables; ▪ Laying of inter-array cables in or on the seabed and, associated cable protection;

Term	Definition
	▪ Installation of subsea cable hubs, including placing of associated foundation; ▪ Final commissioning following cable connections and snagging; and ▪ Post installation surveys.
Development Area	For consenting purposes, the area for which separate consents and/or Marine Licences will be sought by the Applicant, comprising: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Dynamic inter-array cable	The section of inter-array cable between the floating substructure and the seabed, which is designed to accommodate the dynamic movement of the floating substructure.
Floating offshore unit	The combined wind turbine generator and floating substructure.
Floating substructure	A floating structure which provides buoyancy and, in conjunction with the station keeping system, supports a superstructure (e.g. wind turbine generator or offshore substation), and maintaining its position within the structure's excursion limit.
Inter-array cable	Armoured cable containing electrical and fibre optic cores, which link the wind turbine generators to each other and to the subsea cable hubs and/or the offshore substations and include dynamic inter-array cable and static inter-array cable sections.
Mean Sea Level	The average level of the sea taking account of all tidal effects but excluding surge events.
National Electricity Transmission System	The high-voltage electricity power transmission network serving Great Britain which receives electricity from generators (such as offshore wind farms) and transmits that electricity to anywhere on the National Electricity Transmission System to satisfy demand.
ScotWind	A Crown Estate Scotland leasing round for offshore wind projects in which the process enabled developers to apply for seabed rights to plan and build wind farms in Scottish waters.
Scour protection	Protective material positioned around anchors to avoid sediment being eroded as a result of the flow of water.
Site preparation works	Preparatory activities undertaken within the Wind Farm Development Area prior to the commencement of construction of the Wind Farm Infrastructure, which may comprise (and which may require separate consents): ▪ Geophysical surveys, geotechnical surveys, and non-archaeological/archaeological diver/remotely operated vehicle surveys; ▪ Seabed preparation including sand wave levelling, slope levelling for gravity based anchors (if selected), boulder clearance, and pre-lay grapnel runs; ▪ Unexploded ordnance survey and/or clearance; ▪ Debris clearance; and

Term	Definition
	▪ Out of service cable/pipeline removal.
Static inter-array cable	The section of inter-array cable that is not designed to move.
Station keeping system	The system (including mooring lines and anchors) used to hold a floating offshore unit within its excursion limit and maintain the intended orientation of the floating offshore unit.
Subsea cable hub	A subsea device, with a gravel pad foundation, which allows the connection of multiple inter-array cables.
Towing	Transportation of a floating offshore unit or floating substructure between a port, and/or wet storage facility and/or the Wind Farm Development Area.
Wet storage	The temporary storage/anchorage of floating substructures and/or floating offshore units prior to their transportation to the Wind Farm Development Area.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned.
Wind Farm Infrastructure	Infrastructure located within the Wind Farm Development Area including wind turbine generators; floating substructures, station keeping systems and associated scour protection; inter-array cables and associated cable protection; and subsea cable hubs (including activities associated with the Wind Farm Infrastructure construction, operation and maintenance, and decommissioning).
Wind turbine generator	A wind turbine generator converts wind energy into electrical energy. The main components include rotor assembly (composed of three blades and a hub); nacelle (containing the generator, shaft and gearbox, power electronic converter and transformer); and a tower (containing lifting equipment and switchgear).

Glossary of Abbreviations

Term	Definition
AD	Air defence
ATC	Air Traffic Control
CBRA	Cable Burial Risk Assessment
DAS	Digital aerial survey
DIO	Defence Infrastructure Organisation
DSLP	Development Specification and Layout Plan
CMS	Construction Method Statement
EIA	Environmental impact assessment
FOU	Floating offshore unit
FSS	Floating substructure
GW	Gigawatt
HRA	Habitats Regulations Appraisal
IAC	Inter-array cables
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate - Licensing Operations Team
MLWS	Mean Low Water Springs
MOD	Ministry of Defence
NATS	National Air Traffic Services
NLB	Northern Lighthouse Board
O&M	Operation and Maintenance
OfTDA	Offshore Transmission Development Area
PAC	Pre-application consultation
RLoS	Radar line of sight
RRH	Remote radar head
SFF	Scottish Fishermen's Federation
TOPA	Technical and Operational Assessment
UXO	Unexploded ordnance

Term	Definition
WFDA	Wind Farm Development Area
WTG	Wind turbine generator

1 Consultations Undertaken

1. Consultation undertaken to date for the Bellrock Wind Farm Development Area (WFDA) relevant to the project description and project design has been in line with the general process described in **Chapter 5: EIA Methodology (Volume II)**. Key consultation pertinent to this Chapter is provided **in Table 1.1** below.

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Table 1.1: Summary of Consultation Relevant to the Project Description

Consultee	Date/Document	Comment	How/Where Comment Addressed is Addressed
Marine Directorate – Licensing Operations Team (MD-LOT)	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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 Environmental Impact Assessment (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.	**Chapter 4: Project Description (Volume II)** provides a full and detailed description of all options considered within the project design envelope. **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** provides information on the refinements made to the project design since the Scoping Opinion.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that section 3.3.2 of the Scoping Report states that the final wind turbine generator (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.	**Section 4.4.2** in **Chapter 4: Project Description (Volume II)** provides a full and detailed description of the WTG parameters considered within the project design envelope.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	Fixed bottom substructures are no longer under consideration for the WTGs. **Section 4.4.3** in **Chapter 4: Project Description (Volume II)** provides a full and detailed description of all floating substructure (FSS) designs considered within the project design envelope.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	**Section 4.4.4** in **Chapter 4: Project Description (Volume II)** provides a full and detailed description of all anchor and mooring design options considered within the project design envelope, and also information on scour protection.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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. MD-LOT note that 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	**Section 4.4.5** in **Chapter 4: Project Description (Volume II)** provides detail on static and dynamic inter-array cables (IACs). Static IACs may be either surface laid or buried. Details on cable burial is provided in **Section 4.4.6** and detail on cable protection is provided in **Section 4.4.7**, in **Chapter 4: Project Description (Volume II)**. The Cable Burial Risk Assessment (CBRA) will be developed post application and will consider relevant activities in the vicinity of IAC and interconnector cables and confirm appropriate means of protection taking account of the final IAC and interconnector cable layout. The CBRA will identify the appropriate target burial depth to ensure the cables remain buried, or appropriately protected, where target burial depths cannot be achieved, for the duration of the Wind Farm Infrastructure, to reduce the risk of interaction with other sea users or cable exposure. This Bellrock WFDA EIA Report has taken into consideration the minimum and maximum target burial depths and any cable protection for assessment in the technical chapters, where relevant (**Chapters 6 – 19, Volume II**).
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	**Section 4.4.7** in **Chapter 4: Project Description (Volume II)** provides detail on external cable protection. Cable protection is included in the project design envelope and assessed in the technical chapters of this Bellrock WFDA EIA Report, where relevant (**Chapters 6 – 19, Volume II**). Details on seabed preparation are provided in **Section 4.5.1.2** and this includes sand wave levelling, slope levelling for gravity based anchors, boulder clearance and pre-lay grapnel run. No dredging is anticipated.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	**Section 4.4.9** in **Chapter 4: Project Description (Volume II)** details the design envelope of subsea cable hubs.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	Details on boulder clearance are provided in **Section 4.5.1.2** in **Chapter 4: Project Description (Volume II)**.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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 clearance1 in this regard.	**Section 4.5.1.1** in **Chapter 4: Project Description (Volume II)** summarises the surveys to be undertaken as part of the site preparation works. The environmental effects, including in-combination effects, are assessed in the technical chapters of this Bellrock WFDA EIA Report, where relevant (**Chapters 6 – 19, Volume II**). UXO survey and clearance is detailed in **Section 4.5.1.3** in **Chapter 4: Project Description (Volume II).** The worst-case scenario of high order detonation in terms of impact and mitigation has been assessed in **Chapter 9: Marine Mammals (Volume II)**.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that section 3.9.4 of the Scoping Report details that operation and maintenance (O&M) 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.	**Section 4.8** in **Chapter 4: Project Description (Volume II)** describes the O&M phase and associated works. The environmental effects and cumulative impacts during the O&M phase are described in the technical chapters of this Bellrock WFDA EIA Report (**Chapters 6 – 19, Volume II**), where impacts have been scoped in. O&M activities described in this Bellrock WFDA EIA Report are included in the Marine Licence application, unless otherwise stated. Certain activities may be considered for indicative assessment in this EIA Report only, and subject to a separate licence application when further details are known.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	**Section 4.9** in **Chapter 4: Project Description (Volume II)** details the decommissioning phase and associated works. The environmental effects and cumulative impacts during the decommissioning phase are described in the technical chapters of this Bellrock WFDA EIA Report (**Chapters 6 – 19, Volume II**), where impacts have been scoped in. A Decommissioning Programme will be prepared post-application and be submitted to the Scottish Ministers for approval as required under section 106 of the Energy Act 2004, prior to the commencement of construction.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	Detail on drill arisings is provided in **Table 4.8** in **Chapter 4: Project Description (Volume II).** Details on waste management and hazardous waste are presented in **Section 4.7.11** and **Section 4.10**, respectively. Emissions are assessed in **Chapter 17: Greenhouse Gas Assessment (Volume II)** for all Bellrock Project development phases.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	**Table 4.4** in **Chapter 4: Project Description (Volume II)** provides the coordinates of the Bellrock WFDA.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that a number of consultees have provided advice in relation to 'wet storage', including NatureScot which has identified it as a potentially significant impact pathway. The Scottish Ministers are considering their position on this topic and will advise of any updates.	Noted. The temporary mooring of FSSs and/or FOUs at dedicated locations (known as 'wet storage') for the Bellrock Project will be considered through separate consenting process(es) as required. The Applicant is not seeking consent for wet storage within this application, and it has not been included within the scope of this EIA Report. Any proposed projects in the public domain for wet storage facilities on the east coast of Scotland have been considered within the cumulative assessment along with other projects and plans (**Appendix 5.3: Cumulative Effect Assessment Long List of Projects, Volume IV**).
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	Noted. **Chapter 4: Project Description (Volume II)** sets out the Wind Farm Infrastructure and associated activities which are included in the s.36 consent and Marine Licence applications. **Chapter 4: Project Description (Volume II)** also states that site preparation works (undertaken prior to commencement of construction) are outside the scope of the Bellrock WFDA s.36 consent and Marine Licence applications; and will be consented through separate Marine Licence applications. However, to ensure a comprehensive EIA is undertaken, that considers and assesses all impacts associated with the Bellrock WFDA, site preparation works have been assessed in the technical chapters of this Bellrock WFDA EIA Report (**Chapters 6 – 19, Volume II**), within the construction phase assessment of the Bellrock WFDA.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	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.	This Bellrock WFDA EIA Report applies a project design envelope approach in line with the methodology set out in Section 5.7 in **Chapter 5: EIA Methodology (Volume II)**.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	The Scottish Ministers advise that the Developer must make every attempt to narrow the range of options. Where flexibility in the design envelope is required, this must be defined within the EIA Report and the reasons for requiring such flexibility clearly stated. At the time of application, the parameters of the Proposed Development should not be so wide-ranging as to represent effectively different projects. To address any uncertainty, the EIA Report must consider the potential impacts associated with each of the different scenarios. The criteria for selecting the worst-case and the most likely scenario, together with the potential impacts arising from these, must also be described. The parameters of the Proposed Development must be clearly and consistently defined in the application for the s.36 consent and Marine Licences and the accompanying EIA Report.	Throughout the technical chapters of the Bellrock WFDA EIA Report (**Chapters 6–19 (Volume II)**), a parameter-based design envelope has been applied that limits flexibility to only what is necessary. Realistic worst-case scenarios have been assessed for all technical topics, and represent The final design will be confirmed post-consent, and a realistic worst-case scenario derived from the design envelope and representing the greatest potential impact is assessed to ensure all other design scenarios would result in equal or lesser effects. Further detail is provided in **Section 5.7** of the Bellrock WFDA EIA Report and **Chapter 5: EIA Methodology (Volume II)** of the EIA Report.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	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.	Noted. A realistic worst-case scenario derived from the project design envelope and representing the greatest potential impact has been applied across the technical chapters of the Bellrock WFDA EIA Report (**Chapters 6–19, Volume II**), to ensure all other design scenarios would result in equal or lesser effects. Further detail is provided in **Section 5.7** of the **Chapter 5: EIA Methodology (Volume II).**
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT notes that 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.	The project design envelope has been refined since the Scoping Opinion, with details provided in **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** and **Section 4.1.2** of the **Chapter 4: Project Description (Volume II).** A Bellrock Project update consultation letter was issued to all consultees and relevant stakeholders in October 2025 which outlined the refined project design envelope and confirmed

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			that no material changes have been proposed that would require a new scoping opinion (see **Annex E of Appendix 5.2: PAC Report, in the Bellrock WFDA EIA Report (Volume IV))**
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	A detailed description of the alternatives considered for the project design, technology, location, size and scale is provided in **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** and referenced as appropriate in **Chapter 4: Project Description (Volume II)**. This includes consideration of how decommissioning has been taken into account within the design options. The decommissioning phase is described in detail in **Section 4.9** of **Chapter 4: Project Description (Volume II)**.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	A detailed description of the alternatives considered for the project design, technology, location, size and scale is provided in **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** and referenced as appropriate in **Chapter 4: Project Description (Volume II)**.
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that the Scottish Ministers direct the Developer to the Scottish Fishermen's Federation (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.	Noted. The design will be finalised post-consent.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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 Maritime and Coastguard Agency (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.	Noted. Anchor studies have fed into the anchor parameters which are detailed in **Section 4.4.4** in the **Chapter 4: Project Description (Volume II)**. Any cable protection will adhere to the requirements of MGN 654 – including in relation to reduction in surrounding depths – that compliance with MGN 654 is considered as an embedded mitigation measure, as noted in **Section 21** in **Appendix 12.1: Navigational Risk Assessment (Volume IV).**
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that the Scottish Ministers highlight the representation from National Air Traffic Services (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.	Impact to NATS Perwinnes is assessed in **Chapter 13: Aviation and Radar (Volume II).** As also noted in this Chapter, subsequent to the Scoping Opinion, the Applicant reduced the maximum blade tip height from 400 m above mean sea level (MSL) to 337 m above MSL (**Chapter 3: Site Selection and Consideration of Alternatives (Volume II)**). Subsequent to this design change, the Applicant has engaged NATS on the revised WTG parameters and NATS advise that their analysis shows that WTGs with a maximum blade tip height of 337 m above MSL, would be below radar line of sight (RLoS) and "even when we [NATS] apply ducting corrections the detection probability would low enough that it would not draw a NATS objection".
MD-LOT	Bellrock WFDA Scoping Opinion (2024)	MD-LOT note that 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.	Noted. A Report to Inform Appropriate Assessment and Bellrock WFDA Shadow Habitats Regulations Appraisal Derogation Case is submitted in **Volume VI** of this Bellrock WFDA EIA Report, developed in consultation with MD-LOT and NatureScot.

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MD-LOT	Bellrock WFDA Scoping Opinion (2024)	The Plan assessed a potential maximum realistic development for the E1 site of up to 3 gigawatt (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.	Noted. The reassessment and updated Sectoral Marine Plan are yet to be published. The Bellrock Project has increased to 1.8 GW capacity and MD-LOT and all relevant stakeholders have been consulted with on this change via the Bellrock Project update consultation letter. This letter was issued to all consultees and relevant stakeholders in October 2025 (see **Annex E of Appendix 5.2: PAC Report, in the Bellrock WFDA EIA Report (Volume IV)).**
Joint Radio Company (JRC)	Representation on the Bellrock WFDA Scoping Report (2024)	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.	Noted.
MCA	Representation on the Bellrock WFDA Scoping Report (2024)	The MCA note that the Development Specification and Layout Plan (DSLP) 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.	The final Bellrock WFDA layout will be agreed with MCA and Northern Lighthouse Board (NLB) post-consent and will comply with the requirements of MGN 654, noting that compliance with MGN 654 is considered as an embedded mitigation measure in **Chapter 12: Shipping and Navigation (Volume II).**
MCA	Representation on the Bellrock WFDA Scoping Report (2024)	MCA note that 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.	Any cable protection will adhere to the requirements of MGN 654 – including in relation to reduction in surrounding depths – noting that compliance with MGN 654 is considered as an embedded mitigation measure in **Chapter 12: Shipping and Navigation (Volume II).**
MCA	Representation on the Bellrock WFDA Scoping Report (2024)	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 horizontal directional drilling (HDD) location.	As above.

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MCA	Representation on the Bellrock WFDA Scoping Report (2024)	MCA note that in the case of high voltage direct current (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, MCA 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 electromagnetic fields on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition.	HVDC is not under consideration for the Bellrock WFDA as per **Section 6** of **Appendix 12.1: NRA (Volume IV)**. Should HDVC form part of the offshore transmission infrastructure within the OfTDA, a desk-based compass deviation study will be prepared and submitted with the OfTDA consent application.
Defence Infrastructure Organisation (DIO) representing the Ministry of Defence (MOD)	Representation on the Bellrock WFDA Scoping Report (2024)	The DIO has undertaken an assessment based on 80 wind turbines at 400 m to tip height using the Rochdale Envelope boundary co-ordinates. Turbines within the array area will be detectable to the air defence (AD) Radar at remote radar head (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.	Impact to RRH Buchan is assessed **Chapter 13: Aviation and Radar (Appendix II).** Subsequent to the Scoping Opinion, the Applicant reduced the maximum blade tip height from 400 m above MSL to 337 m above MSL (see **Chapter 4: Project Description (Volume II), Section 4.1.2**). Subsequent to this design change which significantly reduces the footprint of the Bellrock WFDA that is in RLoS of RRH Buchan, the Applicant has engaged with the DIO to discuss mitigation options. Should DIO demonstrate that the RLoS impact on RRH Buchan requires mitigation, the Applicant would not position WTGs with an equivalent blade tip height of 323 m above MSL within the RRH Buchan RLoS. The Applicant will continue to engage with DIO on this matter.
DIO representing the MOD	Representation on the Bellrock WFDA Scoping Report (2024)	DIO note 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.	Military low flying activity is assessed in **Chapter 13: Aviation and Radar (Volume II)**. It is noted that the Bellrock WFDA will seek Section 36 consent and a Marine Licence rather that a Development Consent Order. WTGs will be fitted with military accredited lighting as per mitigation outlined in **Table 3.10** in **Chapter 13: Aviation and Radar (Volume II)**.

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DIO representing the MOD	Representation on the Bellrock WFDA Scoping Report (2024)	DIO note the potential for 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.	UXO survey and clearance is detailed in **Section 4.5.1.3** of **Chapter 4: Project Description (Volume II)**.
NATS	Representation on the Bellrock WFDA Scoping Opinion (2024). Technical and Operational Assessment (TOPA)	NATS note 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. 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. ▪ Prestwick Centre ATC: Unacceptable ▪ Military ATC: Unacceptable ▪ Aberdeen ATC: Unacceptable 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.'	Impact to NATS Perwinnes is assessed in **Chapter 13: Aviation and Radar (Volume II)**. Subsequent to the Scoping Opinion, the Applicant reduced the maximum blade tip height from 400 m above MSL to 337 m above MSL (see **Chapter 4: Project Description (Volume II) Section 4.1.2**). Subsequent to this design change, the Applicant has engaged NATS on the revised WTG parameters and NATS advise that their analysis shows that WTGs with a maximum blade tip height of 337 m above MSL, would be below radar line of sight (RLoS) and "even when we [NATS] apply ducting corrections the detection probability would low enough that it would not draw a NATS objection".
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024)	NatureScot note that 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 Habitats Regulation Appraisal (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	The project design envelope has been refined since the Scoping Opinion, with details provided in **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** and **Section 4.1.2** of the **Chapter 4: Project Description (Volume II).** A Bellrock Project update letter was issued to all consultees and relevant stakeholders in October 2025 which outlined the refined project design envelope and confirmed that no material changes have been proposed that would require a new scoping opinion (see **Annex E** of **Appendix 5.2: Pre-**

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		EIA process becoming unmanageable. As the project envelope is refined and the second year of survey data analysed, NatureScot strongly recommend that the validity of the Scoping Opinion is reviewed, discussed and agreed with all parties during the preapplication period to ensure that data sources, sites/qualifying features, impact pathways and assessment processes are fit for purpose.	**application consultation Report, in the Bellrock WFDA EIA Report (Volume IV)).** The HRA and ornithological assessment is based on 2-year digital aerial survey (DAS) data. NatureScot reviewed the Bellrock 2-year DAS report, providing comments which have been addressed by the Applicant. For further details, see: **Appendix 10.1: Offshore Ornithology Digital Aerial Survey Baseline Report (Volume IV), Section 2.1** and **Table 2.1.**
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024)	NatureScot 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 preapplication period to fully understand such technology, drawing on experience from elsewhere or through other industries to inform consideration of assessment requirements.	Shared mooring line configuration was an innovative design option presented at Scoping, and then removed from the project design envelope as part of the EIA process. **Chapter 4: Project Description (Volume II)** provides detail around the Wind Farm Infrastructure options and also includes infographics to illustrate the various design options for floating substructures, mooring lines, anchors (including the shared anchor design), dynamic inter-array cables, and subsea cable hub, aiding the understanding of innovative designs.
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024)	NatureScot note that the project description (Section 3 of the Scoping Report) states that refinement of the project design envelope will continue throughout the EIA process. MCA note that at present the proposed envelope is especially broad. As noted elsewhere in this advice (see cover letter), MCA 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.	The project design envelope has been refined since the Scoping Opinion, with details provided in **Chapter 3: Site Selection and Consideration of Alternatives (Volume II)** and **Section 4.1.2** of the **Chapter 4: Project Description (Volume II).** A project update letter was issued to all consultees and relevant stakeholders in October 2025 which outlined the refined project design envelope and confirmed that no material changes have been proposed that would require a new scoping opinion (see **Annex E** of **Appendix 5.2: PAC Report, in the Bellrock WFDA EIA Report (Volume IV)).**
NatureScot	Representation on the Bellrock WFDA Scoping Report (2024)	NatureScot note that 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. NatureScot highlight that within that seven-year	Noted. As stated in **Chapter 1: Introduction (Volume II),** it is noted that whilst commencement of construction is expected to occur within five years of consent being granted, a seven year s.36 Consent validity date is being sought to provide

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		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.	necessary flexibility in light of uncertainties over the Contract for Difference process and supply chain capacity.
SFF	Representation on the Bellrock WFDA Scoping Report (2024)	SFF notes from section 3.4 '*Wind Turbine Generator Substructure'* (p35) of the Bellrock WFDA Scoping Report that depending on the water depth (which is from c.66 m to 105 m), seabed conditions, and other factors, the Bellrock Wind Farm Infrastructure will use both floating (namely, tension leg platform, semi-submersible, buoy, semi-spar and barge) and fixed foundations designs would be considered in the EIA 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 70 m 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 tension leg platform, and buoy to be the second preferred option since they have lesser spatial footprint on seabed. For the same reasons, SFF advise that their preferred mooring system is 'tension mooring' as defined under sub-section 3.4.1.1 (p39) of the Bellrock WFDA Scoping Report. 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.	Consultee design preferences were considered in developing the project design envelope described in **Chapter 4: Project Description** (**Volume II**) and reflected in the commercial fisheries realistic worst-case parameters (**Chapter 11: Commercial Fisheries (Volume II)**), with implications for access/snags assessed in **Chapter 11: Commercial Fisheries (Volume II).**
SFF	Representation on the Bellrock WFDA Scoping Report (2024)	SFF also notes from section 3.7.1 (p57) that for 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 the other two.	Dynamic/static IAC configurations are described in **Chapter 4: Project Description** (**Volume II**) and reflected in the realistic worst-case parameters for IACs (**Chapter 11: Commercial Fisheries (Volume II)**), with snagging/interference also assessed in **Chapter 11: Commercial Fisheries.**

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SFF	Representation on the Bellrock WFDA Scoping Report (2024)	Regarding 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 advises that it 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. SFF advises that it does 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.	Cable burial/protection preferences are considered within the design envelope (**Chapter 4: Project Description** (**Volume II**)) and realistic worst-case assumptions (**Table 11.12** in **Chapter 11: Commercial Fisheries (Volume II)**) and assessed in **Chapter 11: Commercial Fisheries (Volume II)** for snagging/interference and disturbance pathways.
SFF	Representation on the Bellrock WFDA Scoping Report (2024)	SFF notes from section 3.9.2 (p66) that 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, MCA 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 (three decimal places sufficient) rather than going down to actual seconds and the datum should be WGS84 rather than ED50.	Boulder clearance is included in the realistic worst-case as presented in **Table 11.12** of **Chapter 11: Commercial Fisheries (Volume II),** and disclosure of relocated boulder locations is committed as embedded mitigation in **Table 11.13** of **Chapter 11: Commercial Fisheries (Volume II),** secured through the **FMMCP** (**Volume V**).
SFF	Representation on the Bellrock WFDA Scoping Report (2024)	Regarding decommissioning, SFF notes from section 3.9.5 (p69), of the Bellrock WFDA Scoping Report 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	A Decommissioning Programme will be developed and submitted to Scottish Ministers for approval. **Section 4.9** in **Chapter 4: Project Description (Volume II)** details the decommissioning phase and associated works.

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		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 advise that they would like to see all development related infrastructures are recovered/removed to shore followed by over-trawl sweeps (seabed sweeps using fishing gears), that the seabed is restored to its pre-development condition post-decommissioning, and it is safe for fishing operations to fully resume in the area.	In **Chapter 11: Commercial Fisheries (Volume II)** the approach to decommissioning is set out in **Section 11.7.2,** embedded mitigation measures include a Decommissioning Programme is set out in **Table 11.13**, and fisheries effects during decommissioning are assessed in **Section 11.8**.
Transport Scotland	Representation on the Bellrock WFDA Scoping Report (2024)	Transport Scotland note that the Bellrock Project only includes offshore works and, as such, the Scoping Report only considers potential offshore impacts. No mention is made within the Scoping Report 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.	Noted. **Section 4.7** of the **Chapter 4: Project Description (Volume II)** describes towing of floating offshore units (FOUs) to the Bellrock WFDA.
Transport Scotland	Representation on the Bellrock WFDA Scoping Report (2024)	Transport Scotland note that 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.	Transport Scotland will be consulted on the Bellrock Onshore Transmission Development Area Scoping Report.

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