Bellrock Offshore Wind Farm

Wind Farm Development Area

Volume V

Fisheries Mitigation, Monitoring and Communication Plan

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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.
Bellrock Offshore Wind Farm (or the Bellrock Project)	An offshore wind farm capable of exporting up to 1.8 GW of renewable energy to the National Electricity Transmission System. The Wind Farm Development Area is located 120 km east of Stonehaven, and will connect to the National Electricity Transmission System at the proposed SSEN Transmission Hurlie substation, west of Stonehaven in Aberdeenshire. The Bellrock Offshore Wind Farm comprises of the following Development Areas: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Cable protection	Protective measure to minimise the effects of scour and hazards along the inter-array cables, and protecting these cables at infrastructure crossing points.
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.
Commercial fishing	Any form of fishing activity legally undertaken where the catch is sold for taxable profit.
Commercial Operation Date	The date that the site is fully transferred to the operations team which is likely to be the date of the taking over certificate of the last wind turbine generator to be installed.
Construction port	Port that may be used during the construction of the Wind Farm Infrastructure and includes integration port(s) and assembly port(s).
Construction works	Works to install the Wind Farm Infrastructure as authorised by the Wind Farm Development Area Section 36 Consent/Marine Licence, such as: ▪ Site preparation works undertaken after commencement of construction; ▪ Pre-installation surveys (intrusive and/or non-intrusive); ▪ Placement on or installation in the seabed of anchors and associated scour protection, and mooring lines, and associated scour protection; ▪ Towing or transportation of the floating offshore unit to the Wind Farm Development Area from a port or wet storage facility; ▪ Floating offshore unit installation and commissioning, including hooking-up to the pre-installed mooring system; ▪ Trench excavation for inter-array cables; ▪ Laying of inter-array cables in or on the seabed and, associated cable protection; ▪ Installation of subsea cable hubs, including placing of associated foundation; ▪ Final commissioning following cable connections and snagging; and

Term	Definition
	▪ Post installation surveys.
Demersal seine	A seine net is a long net, with or without a bag in the centre, which is set either from the shore or from a boat for surrounding a certain area and is operated with 2 (long) ropes fixed to its ends (for hauling and herding the fish). The 'Scottish seine' process involves an encircling net shot in the open sea using very long ropes to lay out the net, and ropes on the seabed prior to towing the net closed and hauling from a boat under its own engine power.
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.
Fleet	A physical group of vessels sharing similar characteristics (e.g. nationality).
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.
Gear type	The method/equipment used for fishing.
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.
Landings	Quantitative description of the amount of fish returned to port for sale, in terms of value or weight.
Offshore Development Area	The area comprising: ▪ The Wind Farm Development Area; and ▪ The Offshore Transmission Development Area.
Offshore substation	An offshore platform which houses electrical equipment such as transformers, switchgear, and protection and control systems, enabling the wind farm's renewable electricity to be received via inter-array cables and exported via the offshore export cables.
Offshore Transmission Development Area	The boundary within which the Offshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned (and includes the whole of the Wind Farm Development Area).
Offshore Transmission Infrastructure	Infrastructure located within the Offshore Transmission Development Area including fixed bottom and/or floating offshore substations, offshore reactive compensation station(s) and associated scour protection; interconnector cables and associated cable protection; and offshore export cables and associated cable protection (including activities associated with the Offshore Transmission Infrastructure construction, operation and maintenance, and decommissioning).
Operational life	The expected operational life of the Wind Farm Infrastructure from the Commercial Operation Date to the first floating offshore unit being decommissioned.
Otter trawl	A net with large rectangular boards (otter boards) which are used to keep the mouth of the trawl net open. Otter boards are made of timber or steel and are positioned in such a way that the hydrodynamic forces, acting on them when the net is towed along the seabed, pushes them outwards and prevents the mouth of the net from closing.

Term	Definition
Pelagic trawl	A cone shaped net used to target fish species in the mid-water column.
Potting	Pots (which may be referred to as creels) are generally rigid structures into which fish or shellfish are guided or enticed through funnels that make entry easy but from which escape is difficult. There are many different styles and designs, each one has been designed to suit the behaviour of its target species.
Safety Zone	An area of water around or adjacent to a floating offshore unit which is to be constructed, extended, operated or decommissioned, from which certain or all classes of vessels are excluded and within which activities can be regulated for the purpose of securing safety of the floating offshore unit or vessel in that vicinity, and individuals on the floating offshore unit and vessel, in line with Section 95 of the Energy Act 2004.
Scallop dredge	A method to catch scallop using steel dredges with a leading bar fitted with a set of spring-loaded, downward pointing teeth. The teeth on the bar at the front of the dredge are approximately 120 mm in length, but typically only the front 20 mm penetrate the seabed to dislodge scallops from the sand. Behind this toothed bar (sword), a mat of steel rings is fitted. A heavy net cover (back) is laced to the frame, sides and to the after end of the mat to form a bag.
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.
Shellfish	Aquatic invertebrates with a hard outer covering, either a shell or a shell-like exoskeleton, that are commonly eaten as food.
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 ▪ 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.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned.

Term	Definition
Wind Farm Infrastructure	Infrastructure located within the Wind Farm Development Area including wind turbine generators; floating substructures, station keeping systems and associated scour protection; inter-array cables and associated cable protection; subsea cable hubs; and ancillary infrastructure including buoys (including activities associated with the Wind Farm Infrastructure construction, operation and maintenance, and decommissioning).
Wind turbine generator	A wind turbine generator converts wind energy into electrical energy. The main components include rotor assembly (composed of three blades and a hub); nacelle (containing the generator, shaft and gearbox, power electronic converter and transformer); and a tower (containing lifting equipment and switchgear).

Glossary of Abbreviations

Term	Definition
CBRA	Cable burial risk assessment
CMS	Construction Method Statement
COLREGs	Convention on the International Regulations for Preventing Collisions at Sea
DSLP	Development Specification and Layout Plan
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERCoP	Emergency Response and Cooperation Plan
FIR	Fishing Industry Representative
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FOU	Floating offshore unit
FSS	Floating substructure
IAC	Inter-array cable
IA-CaP	Inter-array Cable Plan
INNSMP	Invasive Non-native Species Mitigation Plan
KIS-ORCA	Kingfisher Information Service - Offshore Renewable & Cable Awareness
LMP	Lighting and Marking Plan
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate - Licensing Operations Team
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MPCP	Marine Pollution Contingency Plan
NLB	Northern Lighthouse Board
NSP	Navigational Safety Plan
NtM	Notice to Mariners

Term	Definition
O&M	Operation and Maintenance
OFLO	Offshore Fisheries Liaison Officer
OfTDA	Offshore Transmission Development Area
OMP	Operation and Maintenance Plan
s.36	Section 36 of the Electricity Act 1989
SFF	Scottish Fishermen's Federation
SOLAS	International Convention for the Safety of Life at Sea
SOMP	Seabed Obstruction Mitigation Plan
UK	United Kingdom
UXO	Unexploded ordnance
VMNSP	Vessel Management and Navigational Safety Plan
VMP	Vessel Management Plan
VMS	Vessel monitoring system
WFDA	Wind Farm Development Area
WTG	Wind turbine generator

1 Fisheries Mitigation, Monitoring and Communication Plan

1.1 Introduction

1.1.1 Overview of the Bellrock Wind Farm Development Area

1. In January 2022, as part of the ScotWind leasing round managed by Crown Estate Scotland, Bellrock Offshore Wind Farm Limited (the Applicant[1]) was successfully awarded exclusivity of an area of seabed in the central North Sea, off the coast of Scotland, to develop the Bellrock Wind Farm Development Area (WFDA), which forms part of the Bellrock Offshore Wind Farm (the Bellrock Project).

2. The Bellrock Project comprises two Offshore Development Areas for which separate consents and/or licences will be sought by the Applicant:

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

3. This Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) relates to the Bellrock WFDA and has been prepared by NiMa Consultants Limited. The OfTDA is not included within this FMMCP but will be subject to a separate FMMCP submitted in support of the OfTDA Marine License application.

4. The location and extent of the Bellrock WFDA, together with the commercial fisheries local and regional study areas used for the environmental impact assessment (EIA) are presented in **Figure A.1 (Annex A)**.

5. The Wind Farm Infrastructure of relevance to this FMMCP includes the following:

   - Up to 132 wind turbine generators with floating substructures (FSS) (together termed as an 'floating offshore unit' (FOU));
   - Station keeping systems for each FSS, including mooring lines, anchoring systems and ancillary elements;
   - Scour protection for FSS anchoring points;

[1] The term 'Applicant' is used throughout this FMMCP, reflecting the application stage of the Bellrock WFDA, and is interchangeable with the term 'Developer' (in relation to post-consent and construction phase works) and 'Operator' (in relation to operation and maintenance phase works).

- Approximately 300 km of inter-array cables (IAC) comprising static and dynamic sections of IACs linking the individual FOUs to subsea cable hub(s) or to the offshore substations[2];
- Associated cable protection as required;
- Up to 18 subsea cable hubs; and
- Ancillary infrastructure including buoys.

6. Site preparation works will be undertaken up to one year before commencement of construction, and construction works are anticipated to take place over a seven-year period. The Wind Farm Infrastructure will have an operational lifetime of up to 35 years.

1.1.2 Purpose of This Document

7. This FMMCP aims to document and demonstrate how the Applicant will liaise and seek to coexist with the commercial fishing industry and deliver the mitigation and monitoring outlined in the Commercial Fisheries Chapter of the Bellrock WFDA Report (**Chapter 11: Commercial Fisheries** of **Bellrock WFDA Report (Volume II)**), which are intended to avoid or reduce potential impacts of the Wind Farm Infrastructure on the fishing industry.

8. In support of this aim, the objectives of the FMMCP are as follows:

- Set out mitigation measures presented in the Commercial Fisheries Chapter of the Bellrock WFDA Report (**Chapter 11: Commercial Fisheries** of the **Bellrock WFDA Report (Volume II)**) relevant to the fishing industry and describe how these will be delivered;
- Set out the approach to monitoring fisheries activity in response to the presence of the Bellrock Wind Farm Infrastructure;
- Describe the approach to fisheries liaison, identifying how communication between the Applicant and the fishing industry will take place and confirming liaison roles and responsibilities; and
- Set out procedures to manage interactions between the Applicant and the fishing industry, including procedures relating to gear loss.

9. The Applicant regards coexistence as the continued presence of both the offshore renewable energy and commercial fishing industries, working constructively alongside one another in the wider area surrounding the Bellrock WFDA. The Applicant considers that the measures set out in this FMMCP support opportunities for coexistence by seeking to avoid or minimise adverse effects on commercial fisheries.

10. The success of the FMMCP in helping to deliver coexistence will require constructive and effective communication between the Applicant and the fishing industry and the support and engagement of both parties.

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

11. This FMMCP covers the construction and operation and maintenance (O&M) phases of the Bellrock Wind Farm Infrastructure. A separate FMMCP will be prepared ahead of decommissioning in line with any conditions of the relevant Marine Licences and the Decommissioning Programme (required under the WFDA Section 36 (s.36) Consent).

1.1.3 Relevant Guidance

12. This FMMCP has been developed in accordance with the following guidance:

- Marine licensing and consenting: Offshore Renewable Energy Projects, Mitigation and Monitoring Plans, Fisheries Mitigation, Monitoring and Communication Plan (hereafter referred to as the Marine Directorate Guidance) (Marine Directorate, 2025);
- Offshore Windfarms - Monitoring Impacts on the Commercial Fishing Industry: Good Practice Guidance (Scottish Government, 2025); and
- Fishing Liaison with Offshore Wind and Wet Renewables (FLOWW) Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments (FLOWW, 2025).

13. This FMMCP has been informed by Marine Directorate and Scottish Government guidance and, where relevant, by wider industry good practice including FLOWW guidance. The Applicant notes that Scottish Fishermen's Federation (SFF) and related associations are no longer participants in the FLOWW process. In the absence of alternative Scottish-specific fisheries liaison guidance, the Applicant will continue to have regard to relevant published good practice, while keeping this position under review and updating the FMMCP where new project-relevant Scottish guidance is published and agreed with regulators and/or the offshore wind sector.

14. In preparation of this FMMCP, other relevant guidance and proposals have also been considered, including Moray Firth and Forth and Tay Commercial Fisheries Working Groups Proposal for Consideration of Mobile Gear Disruption Payments for Construction Phase of Fixed Bottom Offshore Renewable Energy Installations (2024) and Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries (Draft) prepared by the United States Bureau of Ocean Energy Management (2022). Engagement to date with fisheries stakeholders and fishers has also informed the development of this document.

1.1.4 Consents and Licences

15. The following consents and licences are required for the Bellrock Wind Farm Infrastructure, which are expected to be conditioned to require preparation of and adherence to an approved FMMCP:

- S.36 consent under the Electricity Act 1989 for generating stations with capacity of >50 megawatts (outside 12 nautical miles). This consent applies to the Wind Farm Infrastructure as outline in **Section 1.1.1**; and
- Marine Licences under the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010 for construction or deposition in or over the sea, or on and under the seabed of the Bellrock Wind Farm Infrastructure.

1.1.5 Linkages with Other Consent Plans

16. This FMMCP sets out specific procedures relating to the mitigation of effects on commercial fisheries, the Applicant's approach to monitoring and the approach to ongoing communication and liaison with the fishing industry. It will form part of a suite of documents that will provide the framework for the management of the construction and O&M of the Bellrock Wind Farm Infrastructure.

17. A summary of consistency and linkage of the FMMCP with other Consent Plans is provided in **Table 1.1**. The intention is not to duplicate the same information across several Consent Plans, hence linkages are identified in **Table 1.1**.

Table 1.1: FMMCP Consistency With, and Links to, Other Consents Plans

Consent Plan	Consistency with and Linkage to FMMCP
Development Specification and Layout Plan (DSLP)	Sets out the final design and layout parameters associated with the Bellrock Wind Farm Infrastructure.
Environmental Management Plan (EMP)	Sets out the environmental management framework for the construction and O&M of the Bellrock Wind Farm Infrastructure, including the role of the Fisheries Liaison Officer and procedures for reporting of dropped objects and pollution response procedures. An Outline EMP has been submitted in support of this s.36 and Marine Licence consent application (**Outline EMP (Volume V)**).
Lighting and Marking Plan (LMP)	Provides details of lighting and marking of the Bellrock Wind Farm Infrastructure during construction and O&M to aid safe marine navigation.
Inter-array Cable Plan (IA-CaP)	Provides details on IAC specifications, routing, installation method, design cable burial depth, and protection details.
Vessel Management and Navigational Safety Plan (VMNSP)	Provides details on the navigational safety measures to be employed during the construction and O&M of the Bellrock Wind Farm Infrastructure, including a description of project related vessel activity and how it will be managed, use of Safety Zones, promulgation of information to marine users, and a de-confliction notice[1].
Construction Programme, and the Construction Method Statement	Provides details on the timing and sequencing of construction works and commissioning of the Bellrock Wind Farm Infrastructure.
Project Environmental Monitoring Programme	Provides details of the environmental monitoring to be undertaken in relation the Bellrock Wind Farm Infrastructure. Monitoring specific to commercial fisheries is described in this FMMCP.

Notes:

[1] A De-confliction Notice is a plan which sets out measures to be taken to avoid or reduce the impact of vessel movement on the local fishing industry and promotes sustainable coexistence. It will include indicative transit routes for vessels operating in and around the WFDA and transiting to the WFDA from relevant ports.

1.1.6 Document Structure

18. This FMMCP has been structured as outlined in **Table 1.2**. The document has been structured as such to reflect the requirements of the Marine Directorate Guidance.

Table 1.2: FMMCP Document Structure

Section	Summary of Content
Section 1.1: Introduction	Identifies the scope of the FMMCP and provides an overview of the Bellrock WFDA.
Section 1.2: Fisheries Overview	Provides an overview of fishing activity within the Bellrock WFDA, including a summary of the impacts on commercial fisheries and fish and shellfish stocks.
Section 1.3: Fisheries Mitigation	Sets out the Applicant's approach to mitigation, focused on enabling coexistence.
Section 1.4: Fisheries Monitoring	Sets out the Applicant's approach to monitoring fisheries activity in response to the presence of the Bellrock Wind Farm Infrastructure.
Section 1.5: Communication	Sets out the Applicant's approach to communication with the fishing industry and other relevant stakeholders.
Annex A: Figures	Provides figures referenced in this FMMCP.
Annex B: Summary of Stakeholder Engagement	Provides a summary of stakeholder engagement carried out in relation to this FMMCP.

1.2 Fisheries Overview

1.2.1 Fishing Activity Within the Bellrock Wind Farm Infrastructure

19. This FMMCP has been informed by the data collected to support the Bellrock WFDA EIA Report, together with subsequent engagement with commercial fisheries industry stakeholders.

20. **Table 1.3** summarises the commercial fishing fleets relevant to the Bellrock WFDA, identifying the principal target species and describing the nature and extent of fleet activity within the WFDA and the local and regional study areas.

Table 1.3: Commercial Fishing Fleets Relevant to the Bellrock Wind Farm Infrastructure

Fishing Fleet	Target Species	Relevance to Bellrock WFDA
United Kingdom (UK) Fishing Fleets		
UK demersal otter trawl	▪ Nephrops; ▪ Haddock *Melanogrammus aeglefinus*; ▪ Monkfish *Lophius piscatorius*; and ▪ Whiting.	Primarily Scottish registered vessels, over 15 m length targeting Nephrops – variable levels of activity across the Bellrock WFDA, with distinct area of activity in along the eastern edge and in the southeast corner of the WFDA.
UK demersal seine	▪ Haddock; and ▪ Whiting *Merlangius merlangus*.	Scottish registered vessels, over 15 m length – low levels of activity.
UK pelagic trawl and pelagic seine	▪ Mackerel; and ▪ Herring *Clupea harengus*.	Scottish and English registered vessels, over 40 m length – very low levels of activity.
UK beam trawl	▪ Flatfish species *Pleuronectoidei*.	No notable activity in commercial fisheries local study area, but activity in the commercial fisheries regional study area.
UK scallop dredge	▪ King scallop *Pecten maximus*.	No notable activity in commercial fisheries local study area, but activity in the commercial fisheries regional study area, inshore from the Bellrock WFDA.
UK potting	▪ Brown crabs *Cancer pagurus*; ▪ Lobsters *Homarus gammarus*; and ▪ Velvet crabs *Necora puber*.	No notable activity in commercial fisheries local study area, but activity in the commercial fisheries regional study area, inshore from the Bellrock WFDA.
UK gear with hooks	▪ Mackerel *Scomber scombrus*.	No notable activity in commercial fisheries local study area, but activity in the commercial fisheries regional study area, inshore from the Bellrock WFDA.
Non-UK Fishing Fleets		
Non-UK pelagic trawl and purse seine	▪ Mackerel; and ▪ Herring.	Sporadic activity by vessels registered in Denmark, the Netherlands, Germany, France, Lithuania and Sweden.

1.2.2 Fisheries Stakeholders and Engagement

21. The Applicant has undertaken statutory and non-statutory consultation with fisheries stakeholders in relation to the Bellrock WFDA since 2023. A summary of this consultation undertaken prior to submission of the Application is provided in Section 11.3 within **Chapter 11: Commercial Fisheries** of the **Bellrock WFDA Report** (**Volume II**) and is not duplicated here. Engagement with the following fisheries stakeholders has taken place in relation to the WFDA:

- SFF;
- Scottish White Fish Producers Association;
- Scottish Pelagic Fishermen's Association; and
- Individual fishers (at public consultation, community and trade events).

22. Engagement with local fishers has also been undertaken directly by the Applicant and their Fisheries Liaison Officer (FLO), who has been in post since 2022 and who has made port visits to engage with fishers active in the Bellrock WFDA. It is envisaged that this form of engagement with local fishers will be ongoing throughout the lifetime of the Wind Farm Infrastructure.

23. **Annex B** to this FMMCP also provides a summary of stakeholder engagement carried out in relation to this FMMCP.

1.3 Mitigation

1.3.1 Overview

24. It is the intention of the Applicant to facilitate coexistence wherever possible during of the construction and O&M phases of the Bellrock Wind Farm Infrastructure which will include the implementation of mitigation strategies to reduce the overall impacts of the Bellrock Wind Farm Infrastructure.

25. This section of the document presents measures, in addition to fisheries liaison (see **Section 1.5**), that will be put in place by the Applicant to promote coexistence between the Bellrock Wind Farm Infrastructure and fishing activity.

1.3.2 Principles of Mitigation

26. In line with the FLOWW (2025) Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments, the principles of mitigation are that:

- The Applicant will implement measures to reduce and mitigate as far as practicable, potential impacts to commercial fishers during the lifetime of the Bellrock Wind Farm Infrastructure;
- The Applicant will minimise the size and duration of advisory safety distances during works where safe and practicable to do so;

- Safe working practices underpinned by appropriate safety management systems are expected from all vessels undertaking operations related to the Bellrock Wind Farm Infrastructure. Vessels employed by the Applicant will only undertake activities prescribed in their line of work;
- The Applicant will provide local fisheries stakeholders with procedures for registering claims for loss of/damage to fishing gear resulting from offshore works associated with the Bellrock Wind Farm Infrastructure, construction activities and during the O&M phase of the Bellrock Wind Farm Infrastructure; and
- Vessels involved in the construction, and O&M of the Bellrock Wind Farm Infrastructure, including guard vessels and construction vessels, will be provided with the relevant lines of communication (as outlined within this document) to minimise disruption to fishing vessels undertaking their normal activities.

1.3.3 Embedded Measures

27. As part of the design process, a number of embedded mitigation measures were provided within the Bellrock WFDA EIA Report. Those embedded mitigation measures of relevance to commercial fishers are described in **Table 1.4**.

Table 1.4: Embedded Mitigation Measures of Relevance to Commercial Fisheries

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-4	Where seabed preparation is required (e.g. seabed levelling), methods and equipment that have been designed to minimise the potential for sediment suspension and dispersal will be adopted as far as is reasonably practicable.	Primary	Secured in the s.36 Consent and Marine Licence via a condition requiring a Construction Method Statement (CMS) to be developed and submitted to the Scottish Ministers for approval prior to commencement of construction.
WFDA-5	Static sections of the IACs will be installed with a target burial depth of 0.5 to 2.5 m (if burial is required and where ground conditions allow), to avoid the need for external cable protection. External cable protection will only be used where adequate burial cannot be achieved and will be minimised so far as reasonably practicable, thereby limiting permanent benthic habitat disturbance and habitat loss. The requirement for, and extent of, any cable protection will be determined through a post-consent Cable Burial Risk Assessment (CBRA).	Primary	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-9	Development of, and adherence to, a Seabed Obstruction Mitigation Plan (SOMP). The SOMP will set out any potential risks to legitimate sea users and identify measures to reduce these risks.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a SOMP to be developed and submitted to the Scottish Ministers for approval no later than three months after cable laying has been completed.
WFDA-13	For all FSS designs (semi-submersible platform and barge that move with the tide and tension leg platform FSS design, which is restrained by tensioned moorings and does not notably move with the tide), the air gap will be maintained relative to the sea surface and will be minimum 22 m above all tidal levels. This project design envelope will therefore encompass the minimum 22 m air gap above mean high water springs required by the Maritime and Coastguard Agency (MCA).	Primary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a CMS and DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-14	Development of and adherence to an IA-CaP. The IA-CaP will set out detailed IAC installation methods and techniques (based on final project design). The IA-CaP will confirm planned IAC routing, burial (if any), and any additional protection if required, and will set out methods for post-installation IAC monitoring.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-15	A detailed CBRA will be prepared where IACs are proposed to be buried to determine the target burial depth. The burial depths may vary and will be dependent on risk and ground conditions. The CBRA will also highlight instances where adequate burial cannot be achieved, and alternative protection is needed.	Primary	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-16	Any damage, destruction, or decay of cables will be notified to MCA, Northern Lighthouse Board (NLB), Kingfisher, and the United Kingdom Hydrographic Office.	Tertiary	Secured in the s.36 Consent and Marine Licence.
WFDA-17	Development of, and adherence to, a VMNSP. The VMNSP will describe measures put in place by the Applicant related to navigational safety, including information on Safety Zones, charting, construction buoyage, temporary lighting and marking, and means of notification of activity at the Bellrock WFDA to other sea users (e.g. via Notice to Mariners with Kingfisher Bulletins or other appropriate methods). Where appropriate, guard vessels will be used to ensure adherence with Safety Zones or advisory passing distances.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a Vessel Management Plan (VMP) and Navigational Safety Plan (NSP) to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-19	Development of and adherence to a Marine Pollution Contingency Plan (MPCP) outlining the approach for managing and reducing risk of pollution and procedures to protect personnel and to be followed in the event of a pollution incident.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a MPCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **MPCP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-20	During the construction and O&M of the Wind Farm Infrastructure, periodic geophysical surveys would be required to ensure the IACs remain buried and if they do become exposed, remedial works will be undertaken.	Primary	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-21	An EMP will be prepared and implemented to set out the procedures to avoid, reduce, and manage potential environmental effects arising across the construction and O&M of the Bellrock Wind Farm Infrastructure, in accordance with relevant international and national legislation and guidance.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring an EMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline EMP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-22	Advance warning and accurate location details of construction, maintenance, and decommissioning activities, associated Safety Zones, and advisory passing distances will be given via notifications to mariners and Kingfisher Bulletins.	Primary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-26	A detailed Marine Mammal Mitigation Protocol (MMMP) will be prepared for Unexploded ordnance (UXO) clearance. The MMMP for UXO clearance will ensure there are adequate mitigation measures to minimise the risk of any physical or permanent auditory injury to marine mammals as a result of UXO clearance. The most suitable mitigation measures, based upon best available information and methodologies at that time will be utilised. The MMMP for UXO clearance will be prepared in consultation with the Marine Directorate – Licensing Operations Team (MD-LOT) and NatureScot. The MMMP for UXO clearance will include details of all the required mitigation measures to minimise the potential risk of permanent threshold shift as a result of underwater noise during UXO clearance. This would consider the options, suitability and effectiveness of mitigation measures such as, but not limited to: ▪ Avoidance of UXO if practicable; ▪ Use of low-order clearance techniques, such as deflagration; ▪ The potential use of noise abatement if any high-order detonation is required (taking into consideration the environmental limitations); ▪ Monitoring requirements for marine mammal observers; ▪ Requirements for acoustic deterrent devices; and ▪ Other UXO clearance techniques, or relocation of UXO. If more than one high-order detonation is required, other measures such as the use of scare charges; or multiple detonations, if UXO are located in close proximity, will also be considered.	Tertiary	Bellrock WFDA will seek consent for UXO clearance activities via a separate Marine Licence application process. Secured in the UXO MMMP as part of a Marine Licence prior to construction. An **Outline MMMP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-28	Development of UXO Threat and Risk Assessment.	Primary	A UXO Threat and Risk Assessment has been developed to support an indicative assessment of UXO clearance in the Bellrock WFDA EIA Report and will inform separate Marine Licence application(s) for UXO clearance.
WFDA-29	Development and implementation of a FMMCP. The FMMCP will describe the mitigation, monitoring, and communication measures to be implemented during the construction and O&M of the Bellrock Wind Farm Infrastructure to avoid or minimise adverse effects on commercial fisheries.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-30	Participation in a Regional Commercial Fisheries Working Group (subject to a Commercial Fisheries Working Group being established and operating effectively) to assist with liaison between the Applicant and the fishing community.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-31	Adherence to best practice guidance with regards to fisheries liaison and procedures in the event of interactions between the Wind Farm Infrastructure and fishing activities (e.g. Guidance on Claim for Compensation for Damage or Loss of Fishing Gear, Loss of Fishing Time, or Damage to Vessel by Suspected Offshore Renewable Activity (Scottish Government, 2021) and Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments, in particular Chapter 7 (FLOWW, 2025[1]), in particular Section 7 (Disruption Settlements, Protocols for Lost/Damaged Gear, and Fisheries Community Funds).	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-32	Where boulder and/or unexploded ordnance removal is required during site preparation works or any phase of the WDFA, the location of unexploded ordnance and large boulders that are relocated and may pose a snagging risk for fishing gear, will be disclosed to the fishing industry within a timely manner and in an accessible format.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-33	Preparation of an Invasive Non-native Species Mitigation Plan (INNSMP) to include provisions for invasive non-native species management. The INNSMP would implement biosecurity measures in line with international and national regulations and guidance, namely: ▪ International Convention for the Prevention of Pollution from Ships (MARPOL), which sets out requirements, including appropriate vessel maintenance; ▪ The International Convention for the Control and Management of Ships' Ballast Water and Sediments, which provides an international framework for the control of transfer of potentially invasive non-native species from ballast water; and ▪ Consideration of guidance from the International Maritime Organisation (International Maritime Organisation, 2023) on the control and management of ships' biofouling to minimise the transfer of invasive aquatic species.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring an INNSMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **INNSMP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-34	Adherence to the following international and national regulations and guidance, namely: • International Convention for the Prevention of Pollution from Ships (MARPOL), which sets out requirements, including appropriate vessel maintenance; • The International Convention for the Control and Management of Ships' Ballast Water and Sediments, which provides an international framework for the control of transfer of potentially invasive species from ballast water; and	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMNSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
	• Consideration of guidance from the International Maritime Organisation (International Maritime Organisation, 2023) on the control and management of ships' biofouling to minimise the transfer of invasive aquatic species.		
WFDA-35	Ongoing liaison with commercial fishing interests will be maintained throughout construction, O&M, and decommissioning of the Bellrock Wind Farm Infrastructure. A dedicated FLO will be appointed during the construction phase. During O&M and decommissioning, appropriate fisheries liaison arrangements will be maintained, including the appointment of a FLO, if required.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP and a condition requiring the appointment of a FLO to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-36	An application will be made post-consent for Safety Zones including: ▪ An application for Safety Zones for 500 m around each FOU during its construction; ▪ An application for Safety Zones for 50 m around each FOU when construction works have been completed but prior to commissioning, or where construction works are partially completed and a construction vessel is not present; ▪ An application for Safety Zones for 500 m around each FOU during major maintenance during operation; ▪ An application (prior to commencement of decommissioning) for Safety Zones for 500 m around each FOU during its decommissioning; and ▪ Consideration will also be given to an application for 500 m operational Safety Zones throughout the O&M phase.	Primary	Safety Zones will be applied for under Section 95 of the Energy Act 2004 and the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007 before commencement of construction and where required, during construction and periods of major maintenance. Secured in the s.36 Consent and Marine Licence, via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-37	Where appropriate, guard vessels (or other suitable methods) will be used to ensure adherence with Safety Zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, O&M, and decommissioning phases.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
			An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-38	Development of and adherence to a DSLP. A DSLP will be developed post-consent to finalise the Bellrock WFDA layout in consultation with the MCA and NLB.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-39	All relevant Wind Farm Infrastructure will be appropriately marked on all physical and electronic nautical charts as distributed by the United Kingdom Hydrographic Office.	Tertiary	Secured in the DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-40	Development of, and adherence to, an LMP. The LMP will confirm compliance with legal requirements with regards to shipping, navigation and aviation marking and lighting. Failures of the lighting and marking within the Bellrock WFDA will be appropriately reported and rectified as soon as practicable. Interim hazard warnings will be put in place as required.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a LMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline LMP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-41	Any dropped objects during works associated with the Bellrock WFDA will be reported in line with MD-LOT's guidance on the 'accidental deposit of an object at sea' (Marine Directorate, 2024) and objects will be recovered where they pose a hazard to other marine users and where recovery is practicable.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition an EMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline EMP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence Application for the Bellrock Wind Farm Infrastructure.
WFDA-42	Development of, and adherence to, an Emergency Response and Cooperation Plan (ERCoP). The ERCoP will detail protocols that will be undertaken in the event of an emergency, including occupational health and safety (H&S), and set out clear roles and responsibilities, emergency contacts and reporting and escalation pathways. Protocols for extreme weather events will also be included.	Tertiary	Submitted to the Scottish Ministers for approval via the VMNSP, which will address all the recommendations of the Maritime and Coastguard Agency (MCA) in Marine Guidance Note (MGN) 654 (MCA, 2021).

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
	The ERCoP will mitigate the risk of climate change impacts on construction site personnel, plant and equipment and other assets and the risk of delays to the construction programme due to extreme weather events, which are becoming more frequent and intense due to climate change. The ERCoP will ensures the implementation of response protocols in the event of emergencies for offshore activities.		An **Outline VMNSP** (**Volume V**) is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-43	The Applicant will ensure compliance with the Regulatory Expectations on Moorings for Floating Wind and Marine Devices (MCA and Health and Safety Executive, 2017).	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP** (**Volume V**) is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-44	Marine coordination will be implemented to manage project vessels throughout construction, O&M, and decommissioning periods, including in liaison with relevant ports and harbours.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-45	Project vessels will ensure compliance with international marine regulations as adopted by the Flag State, including the Convention on the International Regulations for Preventing Collisions at Sea (COLREGs) and the International Convention for the Safety of Life at Sea (SOLAS), thereby reducing the risk of navigational incidents, including vessel collisions, and associated risks to other sea users and the marine environment.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP, to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-46	The Applicant will ensure compliance with Marine Guidance Note 654 and its annexes, where applicable, including the completion post-consent of an ERCoP and a search and rescue checklist in consultation with the MCA. The ERCoP will ensure the implementation of response protocols in the event of emergencies for offshore activities.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP** (**Volume V**) is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-47	Development of, and adherence to, a Decommissioning programme. The Decommissioning programme will set out the framework for the safe, orderly, and environmentally acceptable decommissioning and removal of the Bellrock Wind Farm Infrastructure, in the interests of safety and environmental protection. Climate change risk measures will be included in the Decommissioning programme to be developed prior to the commencement of construction and will include a review of site-specific weather and metocean conditions, recent extreme weather events and up-to-date climate change projection data will be undertaken to ensure risk assessments, H&S protocols and guidelines on safe working practices are suitable for future climate conditions at the time of decommissioning works. The Decommissioning programme will be refreshed prior to decommissioning activities commencing. The Decommissioning programme will mitigate the risk of climate change impacts on decommissioning site personnel, plant and equipment and other assets and the risk of delays to the Decommissioning programme due to extreme weather events, which are becoming more frequent and intense due to climate change.	Tertiary	Secured in the s.36 Consent and Marine Licence, via a condition requiring a Decommissioning programme to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-50	No more than two non-rotating FOUs will be towed together at once and will not exceed a velocity of 10 knots.	Primary	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.
WFDA-51	Lights, marks, sounds, signals, and other aids to navigation will be exhibited as required by NLB, MCA, and the Civil Aviation Authority including the buoyed construction/decommissioning areas.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a LMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline LMP (Volume V)** is submitted alongside the s.36 consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-52	The layout of the wind turbine generators (WTGs) in the Bellrock WFDA, will be finalised in discussion with the MCA and NLB to ensure the specific layout is compatible with potential search and rescue activity.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.
WFDA-60	Development of, and adherence to, a CMS. The CMS will describe the methods for construction for all consented Wind Farm Infrastructure and set out the measures to be implemented to avoid or reduce adverse effects on the environment and legitimate users of the sea during the construction phase. This will include a clear definition of roles and responsibilities and reference to relevant H&S protocols. In relation to climate change, the CMS will incorporate measures to ensure construction activities are resilient to current and projected extreme weather and metocean conditions. This will include, as appropriate: ▪ Monitoring of site-specific weather and metocean conditions, including use of recognised forecasting and severe weather alert services; ▪ Programming and phasing of construction activities with regard to seasonality and short- to medium-term forecasts; ▪ Definition of safe working limits for vessel, lifting, and installation operations and procedures for suspension of works where thresholds are exceeded; ▪ Measures to secure plant, equipment, and materials during adverse weather; and ▪ Risk assessments and safety procedures that account for site-specific extreme weather risks. Through these measures, the CMS will mitigate risks to construction personnel, plant, and equipment, and reduce the potential for programme disruptions arising from extreme weather events.	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring a CMS to be developed and submitted to the Scottish Ministers for approval before commencement of construction.

Measure ID	Embedded Mitigation Measure	Mitigation Type	Means of Implementation
WFDA-61	Regular and periodic inspections and maintenance of all components of the Wind Farm Infrastructure will be undertaken over their operational lifetime to identify and remediate any damage and deterioration and maintain good working conditions. These will be included in the Operation and Maintenance Plan (OMP). Monitoring of site-specific weather and metocean conditions, recent extreme weather events and up-to-date climate change projection data will be undertaken to provide a dynamic risk assessment of climate change impacts and inform operation and maintenance planning. The OMP will mitigate the risks of climate change impacts on the conditions and performance of the Wind Farm Infrastructure and ensures that it is adaptable to future climate conditions and remains resilient over its operational life. The O&M strategy will be adaptive, with the frequency of maintenance, repair and replacement activities being adjusted based on need (i.e. increasing planned O&M visits for components with higher deterioration rates than anticipated).	Tertiary	Secured in the s.36 Consent and Marine Licence via a condition requiring an OMP to be developed and submitted to the Scottish Ministers for approval prior to the commissioning of the first WTG.
WFDA-62	Regular and periodic inspections and maintenance of the Wind Farm Infrastructure will be undertaken over its operational life to identify and remediate any damage and deterioration and maintain good working conditions (including any debris entangled with the Wind Farm Infrastructure). This will include but not be limited to: ▪ Surveys of subsea infrastructure.	Primary	Secured in the s.36 Consent and Marine Licence via a condition requiring an OMP to be developed and submitted to the Scottish Ministers for approval prior to the commissioning of the first WTG.

Notes:

[1] It is noted that the Scottish Fishermen's Federation and related Associations have withdrawn from the FLOWW process. In the absence of alternative guidance supported by SFF, the Applicant will continue to adopt the FLOWW guidance and review its position should alternative guidance supported by SFF and related Associations be published.

1.3.4 Good Practice Measures

1.3.4.1 Code of Good Practice for Contracted Vessels

28. The Applicant is committed to employing industry standard good practice measures during the construction and O&M phases of the Bellrock Wind Farm Infrastructure.

29. When the Applicant appoints contractors for marine works, they will be contractually required to follow a code of good practice to ensure external communication is accurate and to aid coexistence with the fishing industry. This will include the following considerations when Bellrock WFDA contracted vessels are undertaking works or services relating to the Bellrock WFDA:

- Ensure all vessels adhere to Convention on the International Regulations for Preventing Collisions at Sea (COLREGs; International Maritime Organization, 1972) and The International Convention for the Safety of Life at Sea (SOLAS; International Maritime Organization, 1974) requirements;
- Ensure all vessels do not engage in any commercial or recreational fishing activities;
- All vessels will maintain collaborative, proactive and professional communications with fishing vessels during offshore operations;
- All vessels will monitor at all times the required Very High Frequency channels so as to receive communications directly from fishing vessels;
- All vessels will adhere to the Vessel Management and Navigational Safety Plan (VMNSP); and
- All vessels will have undertaken appropriate risk assessments in respect of potential interactions with commercial fishing vessels and their gears.

1.3.5 Navigational Safety Measures

1.3.5.1 Cable Burial

30. Cable burial is the preferred means of cable protection for the static sections of the IACs. Details of planned cable burial will be confirmed in an Inter-array Cable Plan (IA-CaP) to be prepared by the Applicant and approved by the Scottish Ministers before commencement of construction of the Bellrock Wind Farm Infrastructure. The IA-CaP will be informed by the Cable Burial Risk Assessment and will provide detail on the final routing on the seabed of the static IACs, confirming target cable burial and protection measures where target burial cannot be achieved. The IA-CaP will also set out an approach to surveys of cables and any protection during the operational life of the Bellrock Wind Farm Infrastructure, and measures to be taken in the event of cable exposure.

1.3.5.2 Safety Zones

31. The Applicant will apply for Safety Zones. Temporary Safety Zones of up to 500 m around surface piercing infrastructure will be sought during construction and O&M (during major maintenance) phases. Consideration will also be given to an application for up to 500 m operational Safety Zones throughout the O&M phase. In addition to construction vessels, guard vessels will also be used to ensure adherence with Safety Zones where appropriate, advisory safe passing distances around

project vessels undertaking construction activities or in transit, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction and O&M phases.

32. During the construction phase, the WFDA will be marked as a buoyed construction area. There will be no restriction on entry into the buoyed construction area other than through any active Safety Zones, noting the Cardinal Marks (buoys) will advise mariners to avoid the area. Safety Zones, safe passing distances and buoyed areas will be communicated to marine users via Notice to Mariners (NtM).

33. No decision has been taken at this stage to apply for operational Safety Zones during the O&M phase, although consideration may be given to seeking consent for operational Safety Zones of up to 500 m. Any such post-consent application would be dependent on the final design, the nature of the activity, relevant risk assessment, regulatory requirements and consultation with relevant stakeholders. At this stage, no indication can be given as to the scale, location, duration or permanency of any operational Safety Zones. For the purposes of the EIA a worst-case scenario has been adopted, and it is assumed that commercial fishing activity will not resume within the Bellrock WFDA during the O&M phase.

1.3.5.3 Vessel Transit Routing and Shelter Areas

34. Project related vessel activity will be managed by the Marine Coordinator using a suitable health and safety management system that manages vessel operational permissions, that assesses risks and associated mitigations before entering a works area and carrying out specific activities offshore. Once the location of the WFDA's construction port(s) is/are confirmed, indicative vessel transit routes to and from the works area will be identified in the VMNSP (which will be subject to consultation with fisheries stakeholders prior to its approval) and vessels will adhere to these routes wherever practicable. Vessel anchorage areas, and areas to be avoided, will also be identified and contractors will be instructed to comply.

35. The designation of preferential shelter areas does not over-ride the authority of any vessel master to take whatever navigational decisions are required for the safe operation of that vessel and/or other sea users.

36. It is also recognised that static fishing gear may be located anywhere in the East coast and there is no expectation that indicative transit routes, shelter areas, and holding areas will be cleared of static fishing gear. As such, contracted vessels associated with the Bellrock WFDA are always required to maintain a lookout for, and avoid, appropriately marked fishing gear.

1.3.5.4 Marking and Charting

37. During the construction phase, the Bellrock WFDA will be clearly marked as a construction area using buoys. All construction vessels and installed Wind Farm Infrastructure will be appropriately lit and marked in accordance with the Lighting and Marking Plan (LMP). All installed infrastructure will be marked on United Kingdom (UK) Hydrographic Office Admiralty Charts, including FOUs and subsea cable hubs.

1.3.5.5 Dropped Objects

38. The requirement for procedures relating to dropped objects will be set out in the relevant conditions of the s.36 consent and associated Marine Licence, particularly the requirement to prepare, for approval by the Scottish Ministers, an Environmental management Plan (EMP) (an outline of which is provided with this Bellrock WFDA EIA Report (**Outline EMP (Volume V)**). The EMP will ensure that Marine Directorate – Licensing Operations Team's (MD-LOT's) Offshore Renewable Energy – Accidental Deposit of an Object at Sea guidance (Marine Directorate, 2024) is followed for reporting and retrieval of dropped objects.

39. All Contractors will be required to comply with the approved EMP (**Outline EMP** (**Volume V**).

40. Should the dropped object pose a navigational risk and/or a risk to fishing activity, including snagging or seabed obstruction risk, a NtM and Kingfisher Notice will be issued once the location and details of the object have been established.

1.3.6 Procedures Specific to Fisheries Interactions

1.3.6.1 Procedure in Relation to Gear Fastening or Loss

41. All relevant details of the Bellrock Wind Farm Infrastructure will be provided through the Kingfisher Information Service – Offshore Renewable and Cable Awareness (KIS-ORCA) and other appropriate industry notification mechanisms. The Applicant recognises that KIS-ORCA updates may not always provide immediate visibility of emerging or temporary hazards. Accordingly, where early notification is reasonably required for fishing safety or operational awareness, the Applicant will also use other appropriate industry-standard communication tools or systems, such as Horizon Watch or equivalent mechanisms, together with NtMs, Kingfisher Bulletins and direct fisheries liaison, as appropriate.

42. As per the Seafish et al. (2016) guidance on reducing the risks while fishing:

"In the interests of fishing safety and to prevent damage to subsea structures, fishermen are advised to exercise caution when fishing in the vicinity of subsea cables and renewable energy structures. If it is suspected that gear has snagged a subsea cable, DO NOT endanger vessel and crew by attempting to recover gear. If gear is snagged and it is thought prudent to slip or cut the fishing gear in an attempt to clear a subsea structure, the gear should always be lowered to the seabed first. To slip or cut anything bearing excessive weight should never be attempted".

43. The following procedure replicates that which has been in place in respect of the UK offshore oil and gas industry. It reflects Seafish and KIS-ORCA guidance and describes the steps that should be undertaken in the event of fishing gear becoming fastened within the boundary of the Bellrock WFDA:

- If the fastened gear is not easily retrieved, fishers should not apply excessive winch, line or net hauler loads or engine powers in attempts to retrieve fastened gear;
- Fishing vessel should advise the coastguard or the Marine Coordinator, giving an accurate position of the vessel and/or lost gear;

- If the coastguard or the Marine Coordinator, confirms that the vessel is in the immediate vicinity of a cable, serious consideration will be given to the slipping of the gear and buoying and recording its position;
- After buoying off the gear, the position should be confirmed with the coastguard and the FLO;
- On return to port, the local Fishery Office should be contacted, and the incident registered in the normal manner; and
- On no account should skippers grapple in an attempt to recover fishing gear lost or cut away in the vicinity of the cables associated with the Bellrock WFDA.

44. The following procedure, based on Seafish and KIS-ORCA guidance, should be followed in the event of fishing gear becoming lost or damaged within the Bellrock WFDA:

- On discovery of the lost or damaged gear at sea, the fisher must record the date, time, location (coordinates) and description of the gear lost, or the damages sustained within the vessel logbook;
- On return to port, the fisher must report the incident to the FLO within five days and if possible, provide photos of the damaged gear;
- Once the FLO has been informed of the incident, the FLO will provide a gear loss or damage claim form to the fisher. The fisher will be asked to complete the fishing gear loss or damage claim form which will provide the relevant details for assessment of the likely cause of the loss of or damage to the gear, the value of the lost or damaged fishing gear and any subsequent loss of earnings which incurred as a result of the incident;
- Once completed, the fishing gear loss or damage claim form should be sent to the FLO as soon as possible. This should be supported with photographs of the damaged fishing gear, evidence of the earnings from fishing at the time of the incident, and a quote of the cost for either repair of the damaged fishing gear by a third party or the costs of labour and materials should the skipper and crew undertake replacement of gear themselves; and
- Following the receipt of this fishing gear loss or damage claim form, the Applicant will review the information provided and carry out appropriate further investigations. The Applicant will respond to the claim via their FLO as soon as possible.

45. Following receipt of a completed claim, the Applicant will acknowledge the claim within 10 working days and will set out any further information reasonably required to assess it. The Applicant will seek to determine claims through a transparent evidence-based process having regard to information such as vessel logbooks, plotter records, gear position data, photographs, notices, project records and contractor or Offshore Fisheries Liaison Officer (OFLO) records where available. Where a claim cannot be resolved through the Applicant's initial review, the Applicant will offer escalation to an appropriate independent third-party dispute resolution process. This dispute resolution process, in line with industry standards, will be set out in a project claims procedure to be agreed post-consent with the regulator and relevant fisheries stakeholders.

46. Claims for loss or damage to fishing gear will not be considered where a skipper of a vessel has ignored notices, guard vessel communications, NtM, FLO communications, infringed Safety Zones, or in any other circumstances where the damage to or loss of the gear is as a result of the neglect or default of the skipper of a vessel.

1.3.6.2 Procedure for Gear Relocated/Removed by Gear Owner

47. During the construction and O&M phases, Safety Zones around construction and maintenance works respectively will be determined and communicated to the commercial fishing industry. If static gear is set within the offshore Safety Zones and works areas, the owner of this gear will be requested by the Applicant and/or its related parties or its contractors to relocate or remove gear from within the Safety Zone provided that:

- Safety Zones are communicated to the affected recipients within a reasonable period to allow gear to be relocated/removed prior to works being undertaken; and
- The gear owner is reimbursed for gear relocation/removal having regard to relevant published good practice guidance including following an evidence-based approach.

1.4 Monitoring

1.4.1 Overview

48. The aim of commercial fisheries monitoring is to understand variations in commercial fisheries activity that may be in response to the presence of the Bellrock Wind Farm Infrastructure and use this to inform updates to the FMMCP. The key objectives are to:

- Collate data on commercial fisheries landings and activity by International Council for the Exploration of the Sea rectangle, including landing statistics and vessel monitoring system (VMS) data with the objective to extend the baseline assessment provided within the Bellrock WFDA Report (see **Chapter 11: Commercial Fisheries (Volume II)** and **Appendix 11.1: Commercial Fisheries Baseline Technical Report (Volume IV)** of the **Bellrock WFDA Report**).
- Collate data on commercial fisheries landings by port monthly;
- Collate such other sources of evidence of commercial fisheries activity as may be reasonably available on a regular basis; and
- Monitor available data and evidence to better understand any variations and patterns in commercial fisheries activity.

49. Mitigation and/or any updates to the FMMCP may be informed by an understanding of any changes in fishing activity as noted by the monitoring undertaken.

50. If appropriate and for consideration by MD-LOT and fisheries stakeholders, it may be most effective for commercial fisheries monitoring undertaken across the several offshore wind farm projects in the region to be aligned in approach and deliverables.

51. The proposed approach to monitoring is broadly aligned with that set out in the recently published guidance: *Offshore Windfarms - Monitoring Impacts on the Commercial Fishing Industry: Good Practice Guidance* (Scottish Government, 2025) in terms of data sources and objectives, and is expected to assist in addressing an evidence gap currently identified in the Scottish Marine Energy Research Fish and Fisheries Evidence Map: 'Monitoring of Commercial Fishing Activity in the Vicinity of Offshore Wind Farms and Cables' (Scottish Government, 2024).

1.4.2 Data Sources

52. Monitoring will involve:

- Review of Marine Management Organisation (MMO) landings data by port to allow monitoring of size, target species, tonnage of catch and first sales value monthly;
  - For each port, monthly data will be analysed to determine live weight of key species landed by all vessels, specifically for Nephrops, haddock, monkfish, whiting and other commercial species identified in the commercial fisheries local study area; and
  - Inter annual variations between monthly landings will be examined.
- Additional sources of information will be reviewed to corroborate findings of the analysis of the MMO landing statistics and identify trends not detected by the MMO landings data;
- Analysis of OFLO and guard vessel records (where available);
- Analysis of marine traffic surveys in respect of fishing vessel activity (where available);
- Analysis of Marine Coordination Centre records in respect of fishing vessel activity;
- Analysis of VMS data in respect of fishing vessel activity, based on annual geographic datasets produced by MMO for VMS on UK vessels; and
- Consultation with the commercial fishing industry via the FLO.

1.4.3 Reporting Deliverables

53. It is proposed that reporting outputs will be delivered to cover monitoring results for the following phases:

- Post-consent phase (from consent award onwards provided as a continuation of the baseline presented in the Bellrock WFDA EIA Report);
- Site preparation phase;
- Construction phase: from commencement of construction to the Commercial Operation Date, including reporting on an annual basis; and
- Initial operational phase: A period of three years after Commercial Operation Date, or as agreed with MD-LOT.

1.5 Communication

1.5.1 Principles of Liaison

54. The Applicant regards an approach of avoiding and reducing impacts to the fishing industry as the most sustainable approach to coexistence and the Applicant considers effective communication and information transfer to be a key mechanism for coexistence. In line with the Electricity Works (environmental impact assessment) (Scotland) Regulations 2017 and the Marine Works (environmental impact assessment) Regulations 2007, the Applicant has assessed a worst-case scenario in which fishing activity does not resume within the Bellrock WFDA. This is a project assessment assumption used for impact assessment and is not intended to imply agreement by fisheries stakeholders that fishing will not resume. Fishing within the WFDA would not be legally prohibited other than where specific Safety Zones or other legally sanctioned restrictions apply. The extent to which fishing activity may resume in parts of the WFDA will depend on the final layout and design of the Wind Farm Infrastructure and cannot be fully determined until the final Development Specification and Layout Plan (DSLP) is approved.

55. This section sets out the roles and responsibilities that the Applicant and key contractors will adopt to support coexistence, including the appointment of an FLO, OFLOs, and Fishing Industry Representatives (FIRs) as necessary.

1.5.2 Roles and Responsibilities

56. Details of the roles and responsibility of the Applicant and its future contractors, as far as relevant to this FMMCP, are detailed in **Table 1.5** and expanded upon in **Sections 1.5.2.1** to **1.5.2.6**, with an organogram of key liaison roles provided in **Plate 1.1**.

Table 1.5: Roles and Responsibility of the Applicant and Its Future Contractors

Role	Key Responsibility
The Applicant	▪ The Applicant has overall responsibility for the FMMCP.
Project Director	▪ Approval of the FMMCP for submission the MD-LOT; and ▪ Responsible for requiring sufficient resources and processes are in place to deliver the FMMCP.
WFDA Development Team	▪ Liaising with FLO, OFLO and FIRs; and ▪ Facilitating any updates to the FMMCP.
Contractors and Subcontractors	▪ Work with the Applicant to implement the FMMCP, where applicable.
Fisheries Liaison Officer (FLO)	▪ Provide the Applicant with support and guidance regarding communication and coexistence with the fishing industry.
Fisheries Industry Representative (FIR)	▪ Work with the FLO and the Applicant to provide support and guidance regarding the fishing industry.
Offshore Fisheries Liaison Officer (OFLO)	▪ Communication point between the Applicant's contractors and the fishing industry during offshore works within the WFDA.

1.5.2.1 The Applicant/WFDA Development Team

57. The responsibilities of the Applicant in relation to this FMMCP are:

- Progress the construction of the Bellrock Wind Farm Infrastructure with the least disturbance practicable to the local fishing activities;
- Maintain the on-going employment of a FLO and OFLO (as required when there is offshore works that could interact with existing fishing activities) throughout the lifetime of the Bellrock Wind Farm Infrastructure;
- Aid in the prevention of conflict through the timely provision of information to the FLO, Fisheries Industry Representative (FIR) and the fishing industry, including in relation to cable laying, the type and location of cable protection measures where this may be required, and the timing of construction works; and
- Produce and ensure implementation of Standard Operating Procedures to minimise and appropriately manage potential interactions with fishing vessels.

1.5.2.2 Fisheries Liaison Officer

58. The Applicant has appointed Brown and May Marine as the FLO during the development phase. The FLO reports to the Applicant's Development Team. The FLO will liaise regularly with the OFLOs, and FIRs as required.

59. The FLO's responsibilities will include:

- Preparing and maintaining a project-specific register of local fishers groups and associations;
- Engaging in consultation with the fishing community to understand any concerns with the Bellrock Wind Farm Infrastructure and associated survey and construction activities;
- Arranging or attending as necessary fisheries meetings (with local fishers, fisheries associations) to:
  - Promulgate information on the design envelope, construction programme, and provide updates on any planned changes to the Bellrock Wind Farm Infrastructure throughout the pre-construction phase;
  - Gather fishers' views on effects of projects on their working practices; and
  - Work with fishers to resolve any issues or conflicts arising where practicable.
- Provide advice to the Applicant on fisheries liaison throughout the construction and O&M of the Bellrock Wind Farm Infrastructure;
- Develop and maintain a strong positive working relationship with the local fishing industry;
- Have and maintain a strong knowledge of the fishing industry local to the Bellrock Wind Farm Infrastructure;
- Understand the interactions likely to occur between the local fishing industry and the Bellrock Wind Farm Infrastructure, and any potential impacts on the fishing industry during construction and O&M of the Bellrock Wind Farm Infrastructure;

- Ensure that information is made available and circulated in a timely manner to minimise interference with fishing operations and other users of the sea; and
- Maintain availability to receive and respond to fisheries stakeholders and client enquiries, including resolution of fisheries related issues as they arise.

60. In line with the above responsibilities, the main duties of the FLO are to:

- Maintain the fisheries stakeholder database that contains information on fishing vessel operations (e.g. vessel name, registration and port base, and skipper) within and around the Bellrock Wind Farm Infrastructure;
- Organise, prepare updates and attend fisheries meetings, local fisheries stakeholder events and meetings with regulators, as required;
- Prepare and distribute the required information and notices of all activities associated with the Bellrock Wind Farm Infrastructure which could affect fishing stakeholders;
- Instruct contractors on the fishing activities in the areas of work and provide details on the fishing activities and gear types that may be present, any relevant sensitivities and contact details for communicating with the fishing vessels at sea;
- Manage and coordinate OFLOs that are supporting works at sea, including liaising on any fisheries issues at sea, such as facilitating the relocation or removal of static fishing gear where this may be required;
- Communicate details of any dropped objects to the fishing industry. Dropped objects should be reported to stakeholders within 24 hours of the event occurring (or otherwise as soon as practicable);
- Communicate details of exposed cables and any other safety hazards to the fishing industry;
- Coordinate the activities and responsibilities of the FIRs (if required); and
- Provide monthly reporting to the Applicant during the construction phase of the Bellrock Wind Farm Infrastructure.

61. It should be noted that the FLO is shore-based, typically working standard office hours, and is therefore not the appropriate point of contact for any offshore, non-emergency fisheries-related incident which requires an immediate or very short-term response. Contact in any such non-emergency incident should initially be made with the OFLO at the time, who together with the vessel master can provide a response 24 hours per day. Details of how to contact the OFLO will be included in all NtMs from the Applicant. If the incident is an emergency at sea, the fishing vessel should contact the Coastguard through the normal channels.

62. The FLO will be appointed by the Applicant and not by marine contractors. The appointment and any replacement of the FLO will be subject to the requirements of the relevant consent conditions and approval by the Scottish Ministers where applicable. OFLOs will be appointed to support offshore works and will undertake their fisheries liaison duties independently of vessel operational decision-making, while remaining integrated into project communications for safety and coordination purposes.

1.5.2.3 Fishing Industry Representatives

63. To further aid the establishment of effective communication channels and to benefit from extensive local knowledge, one or more FIR(s) may be employed. FIRs can be helpful when communicating information across a wide geographic area to assist the FLO in delivering face-to-face information dissemination. An FIR will support activities that would otherwise be undertaken by the FLO (if a FIR is not in position).

64. FIRs will make skippers of fishing vessels aware of any forthcoming operations and other on-going activities related to the Bellrock WFDA. The roles and responsibilities of FIR and FLO can be very similar and often delivered by one individual, dependant on knowledge and resource requirements.

65. The primary responsibilities of the FIRs are:

- Liaise with fishing skippers with the objective to provide details of fishing activities in the area and particular sensitivities;
- Maintain mutually productive relationships between the Applicant and fisheries stakeholders;
- Be the local conduit for liaison, providing the day-to-day point of contact for fishers to transmit all their relevant concerns in relation to activities associated with the Bellrock WFDA;
- Log all concerns raised by the fishers, including date, individual and details related to the type, nature and location of the concern and regularly provide this log to the FLO;
- Assist the FLO at a local level in undertaking the tasks listed above, including:
  - Assist the Applicant's representatives to identify areas of concern or conflict at an early stage so that as far as is practicable appropriate measures can be implemented to address these;
  - Assist with the liaison between OFLOs and FLO where necessary, including liaising on any fisheries issues at sea;
  - Assist in the distribution of notices and relevant project information to local fisheries stakeholders;
  - Regularly update the contacts database; and
  - Maintain availability as required for addressing local fisheries issues if they arise.

66. Any FIR(s) will be contracted by the Applicant subject to a Terms of Reference and contract Terms and Conditions. While a FIR may be associated with a specific organisation or association, they will not be acting to the sole benefit of that association. Should an instance arise whereby an industry association or individual fishers does not wish to communicate via the FIR for that area, the FLO will undertake such direct responsibilities to ensure that the association/fishers still has a line of communication to the Applicant and vice versa.

1.5.2.4 Offshore Fisheries Liaison Officer

67. When required, the Applicant will utilise suitably qualified OFLOs throughout the construction and major maintenance phases of the Bellrock Wind Farm Infrastructure. This will ensure that key vessels associated with the Bellrock WFDA include suitably skilled and experienced OFLOs who have relevant local knowledge of the fisheries which could be affected.

68. OFLOs will normally be deployed on the vessel undertaking the relevant offshore activity where this is an effective means of delivering real-time fisheries liaison. Deployment of an OFLO on a guard vessel rather than the active work vessel will also be used where justified by the nature of the activity, vessel configuration, safety considerations or other practical constraints, and where the Applicant is satisfied that liaison effectiveness will not be materially reduced.

69. The primary responsibility of the OFLO is to act as an effective communication point between the Applicant's contractors and the fishing industry during offshore works within the WFDA. The OFLO will be the first point of contact for fishers at sea whilst activities are taking place. The OFLO will be in communication with the WFDA Development Team and the FLO in order to communicate with the local fishing industry the ongoing activities.

70. The primary responsibilities of the OFLOs are to:

- Maintain regular contact with the FLO and the Applicant's personnel, contractors and sub-contractors, as required, concerning marine traffic and fishing vessel activity in the vicinity of the Bellrock WFDA;
- Maintain watch for marine traffic and fishing vessel activity during marine operations and maintain regular contact with guard vessels and support vessels;
- Communicate with the vessel master in respect of providing any relevant information on fishing vessels, and, when the Bellrock Wind Farm Infrastructure-related vessel is not engaged in marine operations, work with the vessel master to avoid, where reasonably practicable, any fishing vessels actively engaged in fishing operations;
- Liaise with any fishers who may have static gear deployed in the vicinity of the Bellrock WFDA or along vessel transit routes;
- Provide the required support to the FLO in the handling of any claims by fishers who may have static gear deployed in the vicinity of the Bellrock WFDA;
- Work with the vessel master to ensure adherence with relevant aspects of the FMMCP;
- Develop and provide training for all vessel personnel to include induction and training for staff with specific fisheries liaison responsibilities;
- Record details of any fishing activity in and around the Bellrock WFDA (including fishing vessels, gear and communications with fishers) and of any events of infringement or movement or damage to static gear;
- When engaged in OFLO duties, provide daily update reports via email to the FLO; and
- Attend meetings, when required, with the Applicant's personnel and the FLO.

1.5.2.5 Guard Vessels

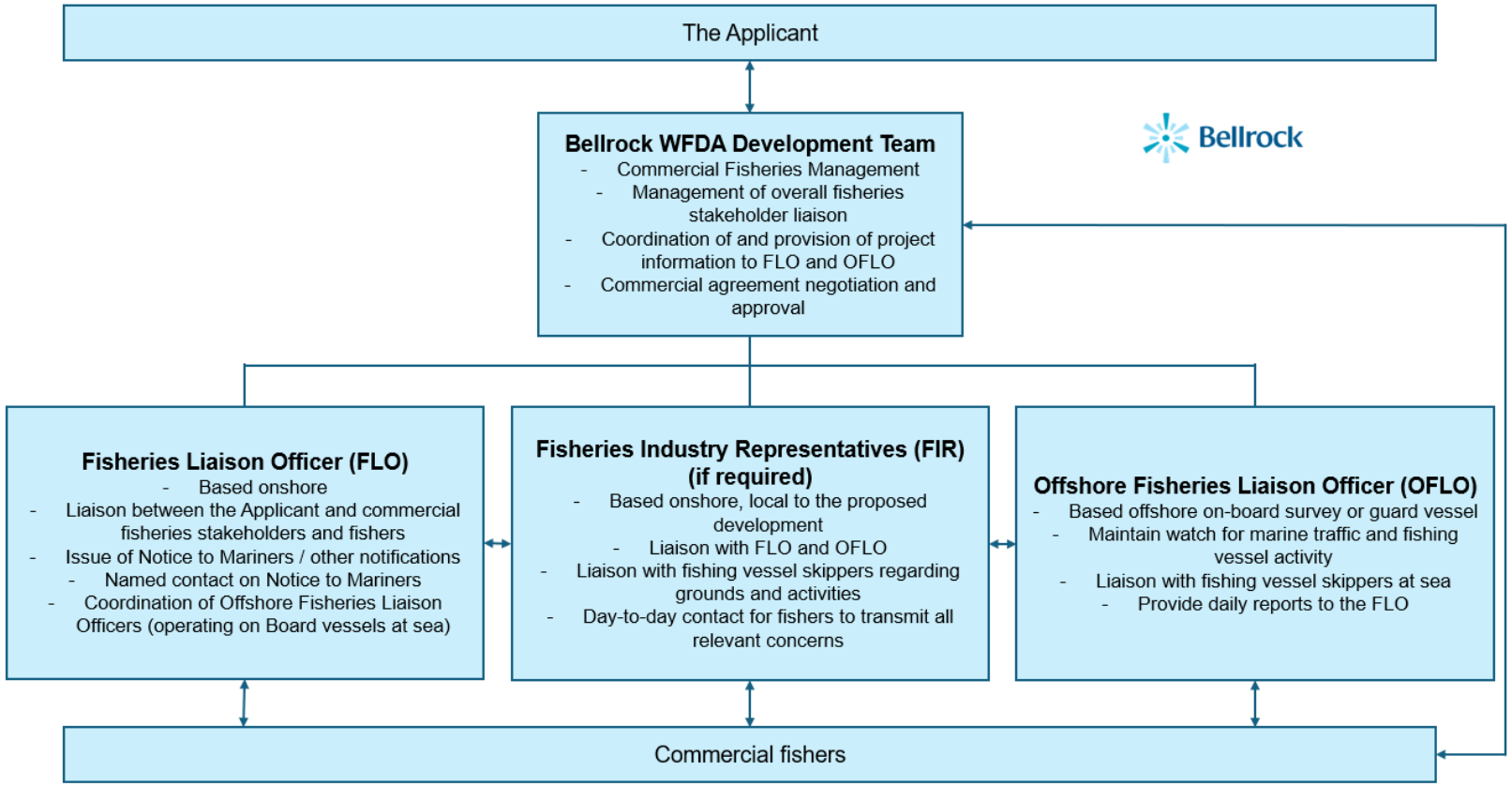
71. During construction and maintenance, a guard vessel(s) may be positioned within the WFDA. The role of the guard vessel(s) is to facilitate safe construction through liaison with other sea users in the vicinity of the works and may, where appropriate, assist in monitoring Safety Zones.

72. Guard vessel(s) will also be in regular communications with the OFLO and FLO to exchange information on fishing activity and any static fishing gear in the vicinity of the Bellrock WFDA. The OFLO may be deployed on board a guard vessel rather than on a construction vessel.

1.5.2.6 Marine Coordination

73. In addition to FLO, FIR(s) and OFLO, a Marine Coordinator for will be appointed. The Marine Coordinator will ensure the marine coordination function is delivered continuously (i.e. 24/7 during the relevant period). The Marine Coordinator coordinates all marine operations relating to the Bellrock WFDA; including monitoring and managing all construction vessel activity. For dissemination of WFDA activity information to other vessels offshore in the vicinity of the Bellrock WFDA, including fishing vessels, the Marine Coordinator shall act as the principle point of reference for the FLO/FIRs/OFLOs, and shall be a point of contact for vessels navigating close to the Bellrock WFDA.

Plate 1.1: Team Organogram and Communication Links to Fisheries Stakeholders



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1.5.3 Ongoing Engagement

1.5.3.1 Post-consent and pre-construction

74. The Applicant will continue to engage with the commercial fisheries industry and fisheries representatives throughout the post-consent and pre-construction phases, including through the development and finalisation of the FMMCP. This engagement will be used to inform fisheries communication and monitoring measures and to identify practicable refinements to the construction programme, vessel movements and working practices, where reasonably practicable, to minimise disruption to commercial fishing activity, including Nephrops fishing, taking account of safety, engineering requirements and current commitments.

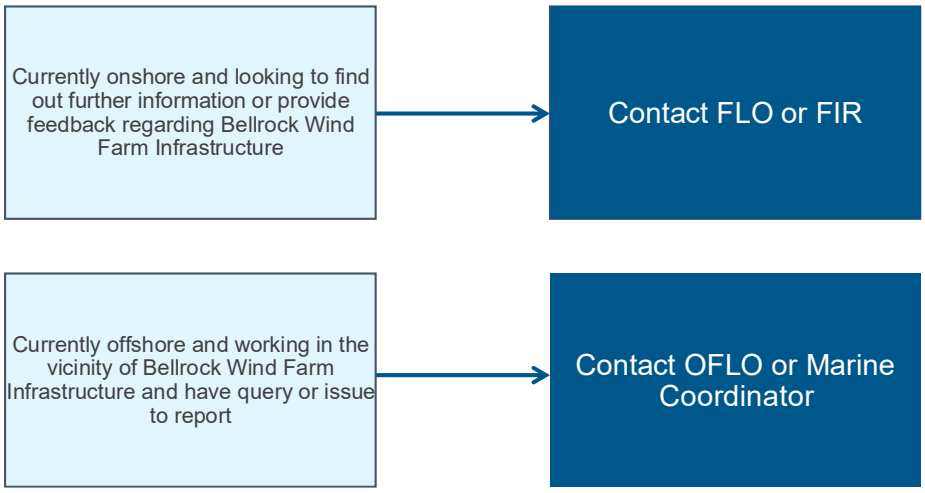
1.5.3.2 Construction and O&M phases

75. Throughout the construction and O&M phases of the Bellrock Wind Farm Infrastructure, the Applicant will remain committed to maintaining open dialogue and effective communications with the fishing industry. This is key to supporting the Applicant's approach to coexistence where possible to enable both the Bellrock Wind Farm Infrastructure and the relevant commercial fisheries to manage works through awareness of upcoming activities, for example notification of planned construction works.

76. Example liaison scenarios are presented in **Plate 1.2**. It is understood that alternative or more specific scenarios may occur, but the principles remain that a fisheries stakeholder or fishers located onshore and wishing to communicate with the Applicant should contact the relevant FIR and/or FLO; where they are offshore and working in the vicinity of the Bellrock WFDA with a more immediate issue or concern, they should contact the FLO and/or the OFLO.

77. Contact details of the FLO will be included within NtMs that will be issued prior to the commencement of works.

Plate 1.2: Fisheries Contacts in Specific Scenarios



78. Throughout the construction and O&M phases, different methods of communication will be used to promulgate relevant information to the fishing industry. Information to be communicated and the methods of communication are summarised in **Table 1.6**.

Table 1.6: Bellrock Wind Farm Infrastructure Information Communication Summary

Communication	Information Promulgated
NtM and Kingfisher Bulletin	A NtM will be issued to provide information such as the nature of activity, location and vessels involved prior to the commencement of new activities. The NtM will be circulated to the local distribution list, uploaded to the Kingfisher Bulletin and made available on the Applicant's website in advance of the commencement of new activities. The FLO will further distribute this NtM to the fisheries distribution list. NtMs will include information on vessels, their operators and contact details etc.
Surveys which may require gear relocation or may cause significant disruption to fishing activity	Notices and information distributed not less than 14 days prior to survey mobilisation (where possible).
Dropped Objects	In the event of a dropped object offshore, the Applicant or its contractors will notify MD-LOT as soon as practicable after becoming aware of the event. Should the dropped object pose a navigational risk and/or a risk to fishing activity, a NtM will be issued once the location, and details of the object can be established. Furthermore, the Applicant or its contractors will issue a 'dropped objects' form to MD-LOT and other relevant stakeholders as required (including the SFF), in the template issued by the MD-LOT, as soon as reasonably practicable following the event. Any further steps as required in consultation with MD-LOT will be notified through a NtM where applicable.
Commercial Fisheries Working Groups (if established and operating effectively)	Meetings approximately every six months or as required during the development phase.
Marine Coordination	The Marine Coordinator will provide a direct point of communication for fishing vessels when active in areas relevant to the Bellrock WFDA. Fishers can contact the Marine Coordinator via marine radio channels or the Marine Coordinator phone line.
Unscheduled and ad hoc liaison	Additional unscheduled liaison and consultation will be undertaken by either the FLO or the FIR as required to address issues and fishers' concerns as they arise.

1.6 References

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Annex A: Figures

Figure A.1: The Bellrock Wind Farm Development Area and Commercial Fisheries Local and Regional Study Areas

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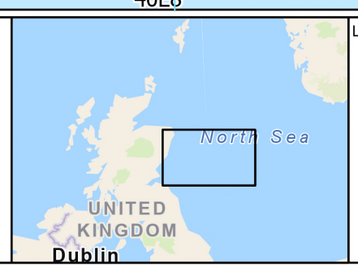

Legend:
- Bellrock Wind Farm Development Area
- Commercial Fisheries Local Study Area
- Commercial Fisheries Regional Study Area
- International Council for the Exploration of the Seas Statistical Rectangles (Incliding codes)
- Exclusive Economic Zone Boundary
- Territorial Sea Limit
- 6 nm Limit

REV	DATE	STATUS	DRW	CHK	APR
1	31/03/2026	Final	DL	ES	BMcG

Coordinate System: WGS 1984 UTM Zone 30N

Source: Esri, CGIAR, N Robinson, NCEAS, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, © Haskoning UK Ltd, 2026.

Scale @ A3 1:750,000

Figure Title: **The Bellrock Wind Farm Development Area (WFDA) and Commercial Fisheries Local and Regional Study Areas**

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Fisheries Mitigation, Monitoring and Communication Plan (FMMCP)

Drawing No.: RHDV_BEL_CST_REP_0003_145

Figure A.1

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Annex B: Summary of Stakeholder Engagement Relating to FMMCP

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1. Consultation on a draft version of the FMMCP was undertaken between 17-12-2025 and 03-02-2026 with the SFF, the Scottish White Fish Producers Association, the Scottish Pelagic Fishermen's Association, and the East Coast Regional Inshore Fisheries Group. Comments were received from the SFF on 02-02-26. These comments, together with the Applicant's responses, are presented in **Table B.1.**

Table B.1: Summary of Stakeholder Engagement Relating to FMMCP

Stakeholder	Date	Comment	Applicant's Response
SFF	02-02-26	**1. Assumptions around long-term non-resumption of fishing within the WFDA** The document assumes that fishing is *unlikely to resume* within the WFDA due to mooring spreads, with the EIA positioned on the basis that fishing will not return. *"The EIA Report assumes… fishing will not resume within the Bellrock WFDA… resumption is considered unlikely…"* From SFF's perspective, this creates an implicit narrative of permanent displacement, which we cannot support. Any such assumption needs to be clearly framed as developer driven, not an accepted industry position.	**Section 1.5.1** has been updated to clarify that the assumption regarding non-resumption of fishing within the Bellrock WFDA is a precautionary assessment scenario applied for EIA purposes only and does not represent an agreed project or industry position.
		2. Heavy and inappropriate reliance on FLOWW guidance The Plan references FLOWW throughout as the basis for liaison, mitigation and disruption procedures. As we have stated consistently, FLOWW is no longer supported by SFF or our constituent associations. References to FLOWW should therefore be removed and replaced with wording noting that Scottish specific guidance is to be developed, which will supersede FLOWW once available.	**Section 1.1.3** has been updated, including a statement that the FMMCP has been informed by multiple guidance documents. References to the FLOWW guidance have been revised to clarify that it is referenced as relevant published good practice guidance. The text also acknowledges that the SFF and constituent associations are no longer participants in the FLOWW process and confirms that the Applicant will keep the approach under review should Scottish-specific fisheries liaison guidance become available. The Applicant cannot however commit to following Scottish-specific guidance, which is not yet published, however will review any such guidance on publication.

Stakeholder	Date	Comment	Applicant's Response
		3. Safety Zones – need for clarity on operational 500 m zones While temporary 500 m zones are standard, the Plan refers to potential applications for 500 m operational Safety Zones during O&M. We would want clarity on: ▪ the scale and duration of any intended applications; and ▪ whether the Applicant intends to pursue permanent operational zones across the site.	**Section 1.3.5** has been updated to clarify that no decision has been taken at this stage to apply for operational Safety Zones during the O&M phase. It is noted that any such application would be subject to further design development, risk assessment, regulatory approval, and stakeholder consultation, and that no indication can currently be given regarding the scale, location, duration or permanence of any operational Safety Zones.
		4. Gear interaction, claims process and independence The proposed claims process appears entirely developer controlled, with no reference to: ▪ independent arbitration; ▪ clear timelines; and ▪ transparent evidence pathways. This structure does not provide confidence for the fleet. A neutral dispute resolution route is required.	**Section 1.3.6** has been updated to introduce greater clarity on the claims process, including acknowledgement timelines, an evidence-based approach, and provision for escalation to an appropriate independent third-party dispute resolution process, to be agreed post-consent with the regulator and relevant fisheries stakeholders or set out in project claims procedure documentation.
		5. Liaison Structure – independence of OFLO/FLO roles The FLO and OFLO roles are shown as being delivered via the Applicant's contractors. For disputes and day today interactions to be credible, these roles should remain independent of project contractors.	**Section 1.5.2** has been updated to clarify the appointment arrangements for the FLO and the OFLO. This includes confirmation that the FLO will be appointed by the Applicant (not by marine contractors) as is normal practice, and that the appointment will be subject to the requirements of the relevant consent conditions and any required approval by the Scottish Ministers. The text also clarifies that OFLOs will undertake fisheries liaison duties independent of vessel operational decision-making.

Stakeholder	Date	Comment	Applicant's Response
		6. OFLO deployment – correct vessel placement/Plate 1.1: Team Organogram and Communication Links to Fisheries Stakeholders OFLOs must be placed on construction and survey vessels, not solely guard vessels. OEUK guidance is clear that FLRs/OFLOs should be deployed on the survey or construction vessel conducting the work, as this is where real-time liaison is most effective. The Plan should explicitly state that OFLO placement on guard vessels should only occur where genuinely unavoidable, to avoid operators defaulting to guard vessel deployment and weakening the liaison function. *For reference, please see the attached extract from the OEUK guidelines.*	**Section 1.5.2** has been updated to clarify that OFLOs will normally be deployed on the survey or construction vessel undertaking the relevant activity, with deployment on guard vessels only used where justified by operational or safety considerations and where liaison effectiveness would not be materially reduced.
		7. Information format and consistency The FMMCP needs to commit to plotter-compatible formats for all fishing relevant data (cables, temporary hazards, exclusion areas, dropped objects, etc.). Embedded Mitigation Measures Table *"(...) will be disclosed to the fishing industry within a timely manner and in an accessible format."* Format should be defined.	The Applicant has no objection in principle to providing fishing-relevant information in charted, plotter-compatible or other standard industry formats. At this stage the FMMCP does not specify exact formats due to uncertainty over the detailed file types and data specifications required. The Applicant will continue to provide information in accessible formats to the extent practicable.
		8. Dropped objects and Table 1.6 – Communication Summary – reference to fishing risk The Plan currently highlights navigational risk but should also reference fishing-specific risk, particularly snagging, grounding, and uncharted obstructions.	**Section 1.3.5** has been updated to reference risk to fishing activity, as a result of dropped objects.
		9. KIS-ORCA update limitations KIS-ORCA data is only issued once annually. The Plan currently assumes constant updates. To support timely communication with fishermen, we recommend that the FMMCP include a commitment to provide early visibility of the proposed route to bridge any time gap between hazard emergence and the next KIS-ORCA release by use of the appropriate industry standard early notification tools. For example, system such as Horizon Watch can be used to disseminate preliminary routing information to fishing stakeholders. This approach helps ensure fishers receive operationally relevant information as early as possible.	**Section 1.3.6** has been updated to clarify that, in addition to KIS-ORCA, the Applicant will use other appropriate industry standard notification mechanisms, such as Horizon Watch or equivalent, NtMs, Kingfisher Bulletins, and direct fisheries liaison, to provide early visibility of emerging or temporary hazards where reasonably required for fishing safety or operational awareness.

Stakeholder	Date	Comment	Applicant's Response
		10. Communication and notices Where the Plan refers to issuing Notices to Mariners for navigational risk, this should be expanded to include fishing specific risk as noted by Andrew. This includes any seabed modifications, UXO/boulder moves, cable exposures, or temporary obstructions.	**Section 1.3.5** and **Table 1.6** have been updated to reference risk to fishing activity in addition to navigational risk.

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