Bellrock Offshore Wind Farm

Wind Farm Development Area

Planning Statement

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1. Introduction

1.1 In August 2024 the UK Government published Clean Power 2030[1] ("CP2030") setting out a "*new era of clean electricity for our country*":-

"Clean Power by 2030 will herald a new era of clean energy independence and tackle 3 major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals."

1.2 The delivery of the ambitions identified in CP2030 requires comprehensive and wide-ranging measures, including significant investment across the UK energy system. CP2030 identifies offshore wind as "*the backbone of the clean power system"*[2]*,* and sets a target for offshore wind to deliver 72 GW – 89 GW of clean energy by 2035.

1.3 The Scottish Government published its Update to the 2020 Offshore Wind Policy Statement in January 2026, describing offshore wind as:

"*an era-defining opportunity to grow our green economy for the benefit of communities across Scotland, while supporting our energy security and journey towards net zero*".[3]

Bellrock Project

1.4 The Bellrock Offshore Wind Farm (the "Bellrock Project") is a proposed floating offshore wind farm, which will generate and transmit renewable electricity and connect to the National Electricity Transmission System via Scottish and Southern Electricity Networks Transmission's ("SSEN Transmission") proposed Hurlie substation in Aberdeenshire, Scotland.

1.5 Exporting up to 1.8 gigawatts (GW) to the National Electricity Transmission System, the Bellrock Project will play a key role in meeting the Scottish and UK Government's Clean Power and Green Economy ambitions, generating enough clean energy to power over 1.7 million homes, and delivering energy security and significant inward investment to the UK and Scottish economies.

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1 National Energy System Operator's (NESO's) Clean Power 2030 Plan.

2 National Energy System Operator's (NESO's) Clean Power 2030 Plan, page 13.

3 Scottish Government (2025) Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition, page 3.

1.6 The stated objectives of the Bellrock Project[4] are:-

- To contribute to the delivery of a significant volume of operational offshore wind in Scottish waters in the 2030s which will generate low carbon electricity in support of the decarbonisation of the Scottish electricity supply as part of Scottish and UK climate change targets and the Scottish Government's ambition of developing up to 40 GW of new offshore wind in Scottish waters by 2040;
- To improve energy security and stability in Scotland and the UK and by providing significant renewable energy generation within Scottish waters;
- To optimise renewable energy generation and supply capacity at scale within the constraints of available Scottish seabed and onshore transmission infrastructure;
- To generate renewable power on the Scottish seabed at greater depths by deploying floating wind technology at scale; and
- To deliver significant socioeconomic benefits and investment within the Scottish supply chain and realise the associated economic development, skills and employment benefits for Scotland.

Bellrock Project – Developer

1.7 The Bellrock Project is being developed by Bellrock Offshore Wind Farm Limited ("the Applicant"), which, headquartered in Edinburgh, is a wholly owned subsidiary of Nadara Limited ("Nadara"). Nadara is a leading UK-based renewables company and one of the largest independent power producers in Europe. Nadara aims to contribute to a world-leading floating offshore wind industry in the UK, combining innovative technology with a plan to attract and grow a skilled Scottish workforce and stimulate a thriving local supply chain and is well placed to deliver world class floating offshore wind farm projects.

1.8 In January 2022, the Applicant was successfully awarded exclusive development rights for an area of seabed to develop the Bellrock Wind Farm Development Area (WFDA). An Option to Lease Agreement for the Bellrock WFDA was signed by the Applicant and CES in April 2022. Upon securing the necessary approvals, the Applicant will enter a lease agreement with CES for the development and operation of the Bellrock WFDA. The seabed lease will be for a period of 60 years.

[4] **Bellrock WFDA EIA Report, Volume II, Chapter 3**, Table 3.2

Bellrock Project - Development Areas and Required Consents

1.9 The Bellrock Project comprises the following three Development Areas for which separate consents and/or licences will be sought by the Applicant:

- The Bellrock WFDA within which the Bellrock Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned. The WFDA is located in the central North Sea, 120 km east of Stonehaven (116 km southeast of Peterhead), Aberdeenshire and covers an area of 280 km^2. The Wind Farm Infrastructure includes wind turbine generators; floating substructures (FSS), station keeping systems (SKSs) and associate scour protections; inter-array cables (IACs) and associated cable protection; subsea cable hubs (including associated gravel pad); and ancillary infrastructure including buoys. The WFDA is located in the marine environment, within the "Scottish Zone"[5] outside 12 nautical miles;
- The Bellrock Offshore Transmission Development Area ("OfTDA") within which the Bellrock Offshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned. The Bellrock Offshore Transmission Infrastructure includes fixed bottom or floating offshore substations; fixed bottom offshore reactive compensation station(s); interconnector cables; and offshore export cables and associated cable protection. The OfTDA is located in the marine environment, from the WFDA (with which it overlaps) to Mean High Water Springs (MHWS); and
- The Bellrock Onshore Transmission Development Area ("OnTDA"), within which the Bellrock Onshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned. The Bellrock Onshore Transmission Infrastructure includes transition joint bay(s); onshore export cables; onshore substation; temporary construction compounds; temporary working areas; environmental mitigation areas; drainage/irrigation infrastructure. The OnTDA is located in an area landward of Mean Low Water Springs (MLWS).

1.10 As different consenting regimes apply to each of the above Development Areas, the Applicant will submit the following consent applications to secure delivery of the Bellrock Project:-

- Application for consent under Section 36 of the Electricity Act 1989 for the construction and operation of the offshore generating station (the Wind Farm Infrastructure located within the WFDA);
- Application for a Marine Licence under the Marine and Coastal Access Act 2009 for the construction and operation of the offshore generating station (the Wind Farm Infrastructure located within the WFDA);

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[5] The Habitat Regulations are the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017. See **Chapter 2: Policy and Legislative Context (Volume II)** of the **Bellrock WFDA EIA Report** for further details

- Application for a Marine Licence under the Marine and Coastal Access Act 2009 and Marine (Scotland) Act 2010 for the construction and operation of Offshore Transmission Infrastructure within the Bellrock OfTDA; and
- Application for Planning Permission in Principle under the Town and Country Planning (Scotland) Act 1997 for the construction and operation of Onshore Transmission Infrastructure within the Bellrock OnTDA.

Planning Statement

1.11 This Planning Statement ("Planning Statement") has been produced by Shepherd + Wedderburn LLP, and supports the consent applications being submitted for the Wind Farm Infrastructure located within the WFDA. These applications are:-

- An application for consent under Section 36 of the Electricity Act 1989 ("the s.36 Consent"), and
- An application for a Marine Licence under the Marine and Coastal Access Act 2009 ("the Marine Licence") (together these are referred to in this Planning Statement as the "Bellrock WFDA Consents").

1.12 Applications will be brought forward separately in due course for the Bellrock OfTDA and Bellrock OnTDA.

1.13 The Bellrock WFDA Consents application are supported by the following documents:-

- Volume I: Environmental Impact Assessment (EIA) Report Non-technical Summary;
- Volume II: EIA Report Chapters;
- Volume III: EIA Report Figures;
- Volume IV: EIA Report Appendices;
- Volume V: Management Plans;
- Volume VI: Shadow Habitats Regulations Appraisal;
- Volume VII: Shadow Nature Conservation Marine Protected Area Assessment; and
- Supporting Information, comprising the Section 36 Consent and Marine Licence Application Cover Letter, Marine Licence Application Form, Location Plan, Planning Statement and Gap Analysis.

1.14 This Planning Statement provides information on the Wind Farm Infrastructure, as well as the wider Bellrock Project, and sets out and considers the relevant legal and policy considerations for determination of the Bellrock WFDA Consents applications.

1.15 This Planning Statement demonstrates the need and benefits of the Wind Farm Infrastructure as part of the Bellrock Project and provides a robust assessment of compliance with relevant legal and policy requirements.

1.16 This Planning Statement provides a robust justification for the granting of the Bellrock WFDA Consents.

2. Bellrock WFDA

2.1 This section of the Planning Statement sets out the approach taken to identify the WFDA and the assessments that have been undertaken to inform the WFDA boundary.

Bellrock Wind Farm Development Area

2.2 The WFDA is located within the E1 Plan Option area identified in the Sectoral Marine Plan (SMP) for Offshore Wind (Scottish Government, 2020) as being an area suitable in principle for floating offshore wind development.

2.3 The SMP provided the spatial strategy to support Crown Estate Scotland's (CES) ScotWind leasing round. The SMP process itself was informed by stakeholder engagement and a Sustainability Appraisal (comprising a Strategic Environmental Assessment, a Habitats Regulations Appraisal, and a Social and Economic Impact Assessment).

2.4 In January 2021, CES launched the ScotWind leasing round which released 15 Plan Options defined within the SMP, for new commercial scale offshore wind developments to help Scotland achieve its Net Zero emissions target by 2045.

2.5 **Volume II, Chapter 3** of the EIA Report sets out in detail the steps taken by the Applicant in its site selection process. In summary, the Applicant sought to define the boundary of the Bellrock WFDA based on the following primary considerations:-

- It was considered that ornithological impacts would reduce in the eastern area of E1 compared to the western and central areas, due to an increased distance from sensitive coastline locations, SPAs and Ramsar sites;
- Consideration was given to minimising the impact to commercial fishers (in particular nephrops) within the Devil's Hole, located within the eastern boundary of Plan Option E1;
- Consideration was given to minimising the impact on 'line of sight' radar from the Remote Radar Head Buchan (Air Defence Radar) and the Perwinnes Primary Surveillance Radar, noting the impacts would reduce and potentially be removed in the eastern area of E1 compared to the western and central areas, due to an increased distance from shore;

- Consideration was given to the size of the WFDA necessary to maintain the minimum development density specified by CES as part of the ScotWind process (noting that CES required a minimum density of 3 MW/km²), whilst maintaining flexibility for the number and layout of wind turbine generators ("WTG") so as to enable the use of the latest turbines to come onto the market in the early to mid-2030s. In addition, consideration was given to allowing flexibility for search and rescue (SAR), vessels and helicopters to maintain safe passage whilst enabling micro-siting for unknown constraints such as wrecks or unsuitable ground conditions; and
- Given the competitive nature of the ScotWind seabed leasing process, the Applicant considered that other developers would seek to secure seabed rights for areas in the western and central area of E1, given the proximity to shore and slightly shallower water depths in these areas. Therefore, the Applicant retained a preference to secure seabed rights for the area in the eastern area, benefiting from the environmental considerations detailed above and potentially more cost-effective seabed leasing costs.

2.6 This process informed the area of seabed for which the Applicant applied to CES for development rights. In January 2022, the Applicant was awarded exclusive development rights for the Bellrock WFDA (See **Figure 1.1, Volume III**) located within Plan Option E1. On entering the Option to Lease Agreement, the Applicant paid an option fee of £28 million to CES which was passed to the Scottish Government for public spending.

Pre-application Consultation

2.7 On entering into of the Option to Lease Agreement with CES, the Applicant has undertaken extensive non-statutory pre-application consultation to inform the proposals for the Bellrock Project, including the Bellrock WFDA. The **Pre-application Consultation Report (Volume IV)** sets out the pre-application process and how the Bellrock Project has been informed by, and responded to, the feedback received during consultation.

2.8 Table 3.1 of **Chapter 3** of the **Bellrock WFDA EIA Report (Volume II)** provides detail on consultation undertaken with the Marine Directorate – Licensing Operations Team (MD-LOT); Marine Directorate – Science Evidence Data and Digital; NatureScot; the Scottish Fishermen's Federation; Scottish White Fish Producers Association; Defence Infrastructure Organisation; NATS; and UK Chamber of Shipping following the entering into of the Option to Lease Agreement.

The Environmental Assessment Process

2.9 EIA is a process for identifying and evaluating the potential significant effects (adverse or beneficial) of a proposed development to inform consent decisions. The EIA Report enables decision-makers, statutory consultees, other stakeholders, and the public to understand potential effects and the scope

for avoiding, preventing, reducing, and if possible, offsetting them, before determining whether to grant consent for the development.

2.10 The following EIA regulations have informed the accompanying **Bellrock WFDA EIA Report**:

- The Electricity Works (EIA) (Scotland) Regulations 2017; and
- The Marine Works (EIA) Regulations 2007 (applies to applications that require an EIA for a marine licence from 12 – 200 nautical miles (nm).

2.11 In March 2024, the Applicant issued a Scoping Request in respect of the WFDA to inform the EIA process. Scottish Ministers issued their Scoping Opinion for the WFDA in August 2024 (a copy of the Scoping Report and Scoping Opinion can be found at **Appendices 1.1** and **1.2** respectively of the **Bellrock WFDA EIA Report (Volume IV)**).

2.12 The EIA Report provides an assessment of the likely significant effects associated with the Wind Farm Infrastructure during the construction, operation and maintenance (O&M), and decommissioning phases. The Bellrock WFDA EIA Report provides information to help inform the determination of the Bellrock WFDA Consents applications by Scottish Ministers.

2.13 In October 2025, the Applicant issued a consultation letter to stakeholders explaining key updates to the Bellrock Project and the WFDA. A copy of that letter can be found in the **Pre-application Consultation Report** of the **Bellrock WFDA EIA Report (Volume IV)**.

2.14 The key updates implemented included the change in the grid connection design, increase in export capacity to 1.8 GW; an update in design parameters including additional WTGs and associated infrastructure (i.e. the FSS, SKS, IAC, subsea cable hubs, and cable and scour protection); and confirmation of the minimum blade clearance above sea surface (22 m). In addition to the increased capacity and change in the grid connection design, the letter also detailed relevant changes to the approach and methodology of the EIA topics since Scoping. The updates to the Bellrock Project did not introduce any new environmental impacts.

2.15 Further details of the above-mentioned design changes are described in more detail in Chapter 3 of the EIA Report (**Volume II**).

2.16 The Applicant has also needed to respond to the evolving grid connection position as administered by the National Energy System Operator (NESO) on behalf of the UK Government. In July 2022 NESO recommended that the Bellrock Project (at 1.2 GW installed capacity) connected to the National Electricity Transmission System via a proposed SSEN Transmission offshore substation.

2.17 However, NESO, having re-considered its recommendation, confirmed in April 2025 that the Bellrock Project would instead connect via an onshore connection point at the proposed SSEN Transmission Hurlie substation to the west of Stonehaven, Aberdeenshire.

2.18 This has necessitated the development of additional offshore and onshore transmission infrastructure as part of the Bellrock Project, which will be advanced through the Bellrock OfTDA and Bellrock OnTDA applications.

2.19 As a consequence of this change, the Applicant has increased the export capacity of the Bellrock Project to the National Electricity Transmission System from 1.2 GW (as was originally proposed) to up to 1.8 GW.

2.20 The increase in generation capacity has not changed the boundaries or extent of the WFDA.

Other Assessments

2.21 As well as the Bellrock WFDA EIA Report, the Applicant has undertaken both (i) an assessment for the purposes of the Habitats Regulations and (ii) an assessment of a nature conservation Marine Protected Area (ncMPA).

2.22 The Habitats Regulations[6] require an assessment to be undertaken by the "Competent Authority" (which in this case is Scottish Ministers) where a project could affect the conservation objectives of certain designated sites (European Sites). These European Sites are those designated as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and proposed or candidate Special Protection Areas and Special Areas of Conservation. Although not currently identified as European Sites under the relevant legislation, in light of expected legal changes, Ramsar sites have been included as European Sites.

2.23 Where there is potential for a project to have a likely significant effect on a European Site, the Competent Authority must undertake an assessment known as an "Appropriate Assessment" to assess impacts. The Competent Authority must consider potential effects of a project both alone and in-combination with other plans or projects.

2.24 Although responsibility for undertaking the Appropriate Assessment lies with the Competent Authority, it is common practice for an applicant to undertake their own assessment to assist the Competent Authority.

2.25 The Applicant prepared a HRA Screening Report (see the **Appendix B** of **the Bellrock Report to Inform Appropriate Assessment Part 1: Introductory Chapter (Volume VI)**) to identify those designated sites where there was potential for a Likely Significant Effect (LSE) in relation to the Wind Farm Infrastructure, both on a project alone basis and in-combination with other plans and projects.

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

2.26 The HRA screening report identified a total of 46 SPAs for which there was considered to be potential for LSE. These 46 SPAs comprised:

- 36 which were included solely on the basis of breeding seabird colony qualifying features;
- Eight which were included solely on the basis of migratory non-seabird qualifying features;
- One which was included on the basis of both breeding seabird colony and migratory non-seabird qualifying features, and
- One marine SPA (which provides supporting habitat for a range of breeding and non-breeding seabird and waterbird qualifying features).

2.27 Of these, 34 SPAs (and Ramsar sites) were taken forward for Phase Two HRA assessment.

2.28 Having identified European Sites for which LSE could not be ruled out, the Applicant has undertaken a report to inform to the appropriate assessment (known as a RIAA). The RIAA can be found in **Volume VI** of the Bellrock WFDA Consents application.

2.29 The RIAA considers whether the potential impacts of the Wind Farm Infrastructure, both alone and in-combination with other plans or projects, on the European Sites for which LSE could not be discounted, and whether there is potential for an Adverse Effect on Site Integrity (AEoSI).

2.30 Of the 34 designated sites for which LSE could not be ruled out, the assessment undertaken for the RIAA demonstrates that there is no potential for AEoSI on 27 of these sites, either from the Wind Farm Infrastructure alone, or in-combination with other plans or projects.

2.31 In respect of the 7 remaining sites, it has been concluded that there is no potential for AEoSI from the Wind Farm Infrastructure on a project alone basis, but that in-combination effects with other projects cannot be ruled out.

2.32 Where an Appropriate Assessment identifies that an AEoSI on European Sites may occur, consent may be granted for that project provided certain criteria can be met, and where there is found to be sufficient public interest and benefits in the project. This is known as the “Derogation Case”. Details on the Derogation Case for the Bellrock Project are set out below, and in the Shadow Habitats Regulations Appraisal Derogation Case (**Volume VI**).

2.33 Nature conservation MPAs are areas within the marine environment established for the protection of nationally important marine habitats, species, and geodiversity features.

2.34 The Applicant undertook a screening exercise to identify ncMPAs that may be potentially affected by the Wind Farm Infrastructure. Following this screening exercise, the Southern Trench ncMPA was identified as the only ncMPA for a potential interaction with the Wind Farm Infrastructure.

2.35 The Southern Trench ncMPA is located within Scottish Territorial Waters and approximately 94 km from the WFDA. It is designated for four biodiversity features: burrowed mud, fronts, minke whale and shelf deeps; and two geodiversity features: Quaternary of Scotland and Submarine Mass Movement.

2.36 Of these features, the only potential interaction between the ncMPA and Wind Farm Infrastructure was identified as underwater noise during the construction phase and vessel collisions with minke whales.

2.37 As the ncMPA is located within Scottish Territorial Waters, it is designated under, and subject to the provisions of, the Marine (Scotland) Act 2010.

2.38 Where Scottish Ministers are satisfied that an activity will not represent a significant risk of hindering the conservation objectives of the ncMPA, no further action is required.

2.39 The Applicant has undertaken an assessment of potential impacts on the conservation objectives of the Southern Trench ncMPA, specifically potential impacts on minke whale (see the **Report to Inform Nature Conservation Marine Protected Area Assessment, Volume VII**).

2.40 The ncMPA assessment concludes that with appropriate mitigation measures in place, the Wind Farm Infrastructure does not have the potential, either alone or in combination with other plans or projects, to hinder the achievement of the minke whale conservation objectives of the Southern Trench ncMPA. No further action is therefore required and the Southern Trench ncMPA is not a barrier to the grant of the Wind Farm Infrastructure Applications.

Wind Farm Infrastructure Project Design Envelope Approach

2.41 In line with established practice, a parameter-based project design envelope approach has been adopted (sometimes referred to as the "Rochdale Envelope"). The project design envelope sets out a minimum and maximum design scenario within which the design will fall within. For example, the WTGs will have a maximum blade tip height above sea surface[7] of between 271 metres and 335 metres.

2.42 The project design envelope approach allows for a degree of flexibility in the design and description of a project to provide for refinement and optimisation of a project design post consent. This is of particular importance to floating offshore wind farm projects such as the Bellrock Project, where technology will continue to evolve and the supply chain will continue to grow.

2.43 The project design envelope approach to the Bellrock WFDA Consents Applications and EIA Report has followed the relevant guidance as issued by MD-LOT and the Scottish Government's Energy Consents Unit (Electricity Act 1989 - Section 36 Applications: Guidance for Applicants on Using the Design Envelope). Further detail on the project design envelope approach can be found in **Chapter 4: Project Description** of the **Bellrock WFDA EIA Report (Volume II)**.

2.44 The project design envelope approach has been applied and informed the assessments undertaken and reported in the EIA Report, RIAA and ncMPA (**Volumes II to VII**).

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[7] For FSS designs that move with the tide (i.e. semi-submersible platform and barge), these parameters will be maintained relative to the sea surface. For the Tension Leg Platform FSS design, which is restrained by tensioned moorings and does not notably move with the tide, these parameters are set out in the stated project design envelope.

3. Bellrock Wind Farm Infrastructure

3.1 This section of the Planning Statement provides a summary of the Wind Farm Infrastructure located within the WFDA for which consent is being applied for under the Bellrock WFDA Consents applications. A detailed description of the Wind Farm Infrastructure is set out **in Chapter 4: Project Description** of the **Bellrock WFDA EIA Report (Volume II).**

3.2 The Wind Farm Infrastructure comprises WTGs and associated FSSs (collectively known as floating offshore units (FOUs)), SKSs which connect the floating substructures to the seabed and maintain its position, and associated scour protection, IACs and associated cable protection, subsea cable hub(s) (including gravel pad(s)) and ancillary infrastructure including buoys.

3.3 WTG design will continue to evolve, and a decision on WTG design and model(s) will be made post consent. For the purposes of the Bellrock WFDA Consents applications, the WTG parameters have been informed by the technology that is both currently available and what is expected to be available by the early to mid-2030s, when the commencement of construction for the Bellrock WFDA is anticipated.

3.4 The Bellrock WFDA Consents applications and Bellrock WFDA EIA Report consider two WTG types as part of the design envelope, "WTG Type 1" with a maximum rotor diameter of 236 m, and "WTG Type 2" with a maximum rotor diameter of 300 m.

Table 1: Wind Farm Infrastructure

Proposed Infrastructure	Infrastructure Detail
Wind turbine generator Type 1	Up to 132 WTGs, with a maximum hub height above sea surface[8] of 153 metres (m), a maximum blade tip height above sea surface of 271 m and a maximum rotor diameter of 236 m.
Wind turbine generator Type 2	Up to 90 WTGs, with a maximum hub height above sea surface of 185 m, a maximum blade tip height above sea surface of 335 m and a maximum rotor diameter of 300 m.
Floating substructures	Floating substructures include semi-submersible, barge and tension-leg platform design options.

[8] For FSS designs that move with the tide (i.e. semi-submersible platform and barge), these parameters will be maintained relative to the sea surface. For the Tension Leg Platform FSS design, which is restrained by tensioned moorings and does not move with the tide, these parameters will be within the stated project design envelope.

Proposed Infrastructure	Infrastructure Detail
Station Keeping Systems (i.e. Mooring Lines and Anchors)	Up to nine mooring lines per FSS (mooring line design options include catenary, taut, semi-taut and tension) and up to nine anchors per FSS (anchor design options include driven pile, suction pile, drag embedment anchor and gravity based anchor). Scour protection to protect the anchors.
Inter array cables	Approximately 300 km of IACs operating at 66 voltage (kV) or 132 kV, comprising static (on the seabed) and dynamic (moving in the water column) sections. Cable protection for the inter-array cables.
Subsea cable hubs	Up to 18 subsea cable hubs (including a gravel pad) with maximum dimensions of 13 m x 13 m (length x width), resulting in a maximum permanent seabed footprint of 169 m^2.

3.5 As well as the Wind Farm Infrastructure, there are various ancillary works associated with the construction of the Wind Farm Infrastructure, these include:-

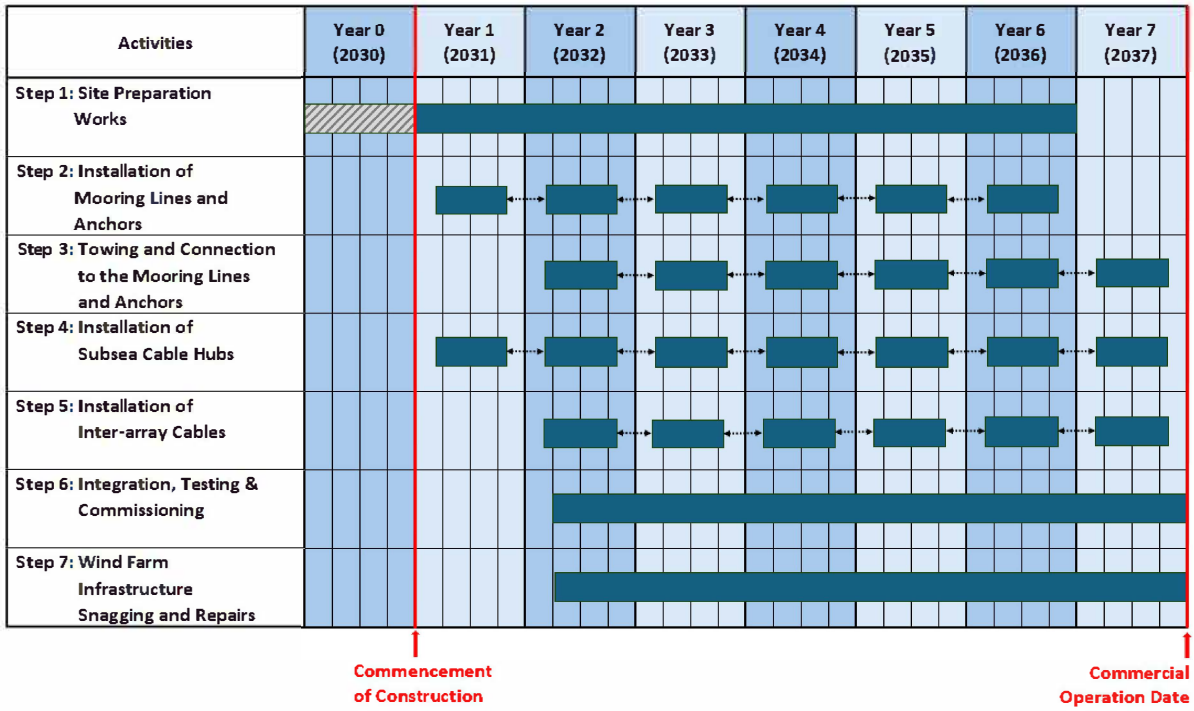
- Buoys including mooring buoys and metocean buoys;
- Site preparation works[9] will be undertaken within the Bellrock WFDA in advance of the implementation of the Bellrock WFDA Consents:-
  - (i) Surveys, including geophysical surveys, geotechnical surveys, and non-archaeological/archaeological diver/remotely operated vehicle surveys;
  - (ii) Seabed preparation including sand wave levelling, slope levelling for gravity based anchors (if selected), boulder clearance and pre-lay grapnel runs;
  - (iii) Unexploded ordnance survey and/or clearance;
  - (iv) Debris clearance; and
  - (v) Out of service cable/pipeline removal.

[9] Site preparation works do not form part of the Wind Farm Infrastructure Consent applications and will be consented separately, but have been considered and assessed as construction activities in the EIA Report.

Construction

3.6 An indicative construction programme for the Wind Farm Infrastructure is set out below:-

Table 2: Wind Farm Infrastructure Construction Programme



3.7 It is anticipated that site preparation works will commence in 2030 with commencement of construction of the Wind Farm Infrastructure in 2031. The overall duration of construction will be approximately 7 years with one year of site preparation works prior.

3.8 Safety Zones will likely be applied for during the construction phase of the WFDA, the details of which will be developed during the construction phase and communicated via the publication of Notices to Mariners and within the Kingfisher Bulletin (as a minimum).

3.9 Further detail on the construction phase of the WFDA can be found in **Chapter 4: Project Description** of the **Bellrock WFDA EIA Report (Volume II)**.

Operation and Maintenance

3.10 The operational lifetime of the Wind Farm Infrastructure is expected to be 35 years.

3.11 The O&M requirements for offshore wind farms generally includes both minor corrective maintenance (e.g. the repair of damaged or defective components) and major corrective maintenance (e.g. the replacement of main components such as gearboxes and blades for WTGs). There will also be routine inspection of Wind Farm Infrastructure and scheduled maintenance such as removal of marine growth.

3.12 The O&M strategy for the Bellrock Wind Farm Infrastructure will be informed by a number of factors, such as the detailed design of the Wind Farm Infrastructure, the O&M port location, manufacturer

requirements, weather and metocean conditions, safety requirements and transit durations. Further detail on the O&M strategy and approach can be found in Section 4.8 of **Chapter 4: Project Description** of the **Bellrock WFDA EIA Report (Volume II).**

Decommissioning

3.13 Prior to the commencement of construction, a Decommissioning Programme, will be submitted to Scottish Ministers for approval. The Decommissioning Programme will consider good industry practice, guidance and legislation for decommissioning works which includes anticipated costs and financial securities. It will be consulted on by stakeholders and is reviewed throughout the lifetime of the WFDA.

3.14 The Decommissioning Programme will have regard to the relevant legislative and policy requirements applicable at the time, currently this includes sections 105 to 114 of the Energy Act 2004 and the Marine Scotland document 'Decommissioning of Offshore Renewable Energy Installations in Scottish Waters or in the Scottish part of the Renewable Energy Zone (REZ) under The Energy Act 2004: Guidance Notes for Industry (in Scotland)' (Scottish Government, 2022).

3.15 It is expected that the Bellrock Wind Farm Infrastructure will be fully removed at the end of its operational life. In accordance with Scottish Government Guidance, exceptions to this would be where removal would create unacceptable risks to personnel or to the marine environment, be technically unfeasible or involve extreme costs. Further detail on the decommissioning of the WFDA and Decommissioning Programme can be found in Section 4.9 of **Chapter 4: Project Description** of the **Bellrock WFDA EIA Report (Volume II).**

Other Consents

3.16 As detailed above, the Applicant will also require consents for the Bellrock OfTDA and Bellrock OnTDA as well the Bellrock WFDA Consents for the Bellrock Project. There are a number of environmental consents and licences that will likely be required for the construction and operation of the Wind Farm Infrastructure:-

- Basking Shark Licences;
- European Protected Species Licences;
- Safety Zones; and
- Decommissioning for renewable energy installations.

3.17 Further detail on the consents required for the Wind Farm Infrastructure can be found in **Chapter 1: Introduction** of the **Bellrock WFDA EIA Report (Volume II)**.

4. Bellrock Wind Farm Infrastructure – Assessment of Environmental Effects

4.1 This section of the Planning Statement provides a summary of the conclusions of the Bellrock WFDA EIA Report, including the identification of potentially significant environmental effects and mitigation measures.

4.2 The Bellrock WFDA EIA Report has assessed the potential environmental impacts of the Wind Farm Infrastructure on relevant receptors both individually and cumulatively with other projects.

4.3 The Bellrock WFDA EIA Report has informed the identification of measures that can be taken to reduce environmental impacts as well as mitigation measures. These are detailed in the relevant technical chapter of the Bellrock WFDA EIA Report.

4.4 The Applicant has applied the IEMA guidance, '*Implementing the Mitigation Hierarchy from Concept to Construction'* (2024), in the design and approach to mitigation. The mitigation hierarchy advocates the approach of firstly trying to avoid, then minimise and mitigate impacts.

4.5 Three types of mitigation have been considered in the EIA Report:-

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

4.6 The primary and tertiary mitigation measures are embedded in the Wind Farm Infrastructure, whereas secondary mitigation measures are applied in instances where potential significant effects are identified. Secondary mitigation measures will further reduce a negative effect or enhance a positive effect.

4.7 The Applicant has prepared Management Plans (these can be found in **Volume V** of the Bellrock WFDA Consents application) setting out how proposed mitigation and monitoring measures to

minimise environmental effects are fully delivered during the construction and operation and maintenance of the Bellrock Wind Farm Infrastructure.

4.8 As is standard practice, the requirement to produce and comply with Management Plans will be secured by conditions in the Bellrock WFDA Consents. A number of these Management Plans will be developed through consultation with relevant stakeholders and will be informed by the final design and construction and maintenance methods adopted for the Wind Farm Infrastructure.

4.9 Following the application of the mitigation hierarchy, including mitigation measures, the **Bellrock WFDA EIA Report (Volume II)** sets out the predicted residual effects of the Bellrock Infrastructure on key receptors. These are summarised below by reference to both project alone and cumulative impacts:-

Table 3: Residual Effects

EIA Topic Area	Wind Farm Infrastructure Project Alone Predicted Impacts	Wind Farm Infrastructure Cumulative Impacts
Chapter 6: Marine Geology, Oceanography and Physical Processes	No significant effects	No significant cumulative effects
Chapter 7: Benthic Ecology	No significant effects	No significant cumulative effects
Chapter 8: Fish and Shellfish Ecology	No significant effects	No significant cumulative effects
Chapter 9: Marine Mammals	No significant effects	No significant cumulative effects
Chapter 10: Offshore Ornithology	No significant effects	No significant cumulative effects other than a potential significant adverse effect during operation, in relation to regional razorbill population as a result of disturbance and displacement impacts (noting that the Bellrock WFDA contribution to the cumulative total represents less than 1% of predicted mortality across all projects).
Chapter 11: Commercial Fisheries	No significant effects other than for UK demersal otter trawl fleet, targeting Nephrops (using TR2 gear), for which a significant (moderate) adverse effect is predicted. This is related to loss of access to a small portion of the Devil's Hole Nephrops grounds in the eastern area of the Bellrock WFDA, during all phases of the Bellrock Wind Farm Infrastructure.	No significant cumulative effects other than for UK demersal otter trawl fleet, targeting Nephrops (using TR2 gear), for which a significant (moderate) adverse effect is predicted. This is related to loss of access to a small portion of the Devil's Hole Nephrops grounds in the eastern area of the Bellrock WFDA, during all phases of the Bellrock Wind Farm Infrastructure.

EIA Topic Area	Wind Farm Infrastructure Project Alone Predicted Impacts	Wind Farm Infrastructure Cumulative Impacts
Chapter 12: Shipping and Navigation	No significant effects	No significant cumulative effects
Chapter 13: Aviation and Radar	No significant effects	No significant cumulative effects
Chapter 14: Marine Infrastructure and Other Users	No significant effects	No significant cumulative effects
Chapter 15: Marine Archaeology and Cultural Heritage	No significant effects	No significant cumulative effects
Chapter 16: Socioeconomics, Tourism and Recreation	Potential significant beneficial effects in the local and Scottish economy at the construction and operation and maintenance ports, in relation to employment and gross value added (GVA). Potential significant effects during construction, and operation and maintenance at smaller ports due to increases in population, increases in housing demand, pressure on local services, and changes in the way people live, work, and interact with one another (socio-cultural effects). This will be managed through implementation of a Stakeholder Engagement Plan which will set out ongoing engagement, for example, with the local community, local authority and ports.	No significant cumulative effects. Minor beneficial effect in Scotland during construction in relation to employment and GVA.
Chapter 17: Greenhouse Gas Assessment	The Bellrock WFDA and the Bellrock Project as a whole, will provide a significant climate benefit during operation. No significant effects on blue carbon habitats.	No project specific cumulative assessment has been undertaken for the greenhouse gas assessment, the whole project assessment and the blue carbon loss assessment. Cumulative disturbance effects on blue carbon habitats have been assessed (as informed by Chapter 7: Benthic Ecology) and are not significant.
Chapter 18: Climate Change Resilience	No significant effects	Cumulative effects were scoped out.
Chapter 19: Major Accidents and Disasters	No significant effects	CEA not required due to distance from other projects.

4.10 The EIA Report has assessed the potential impacts of the Wind Farm Infrastructure on key receptors using a realistic "worst case" scenario. The EIA has informed the design of the Wind Farm Infrastructure as well as identifying mitigation measures to reduce impacts.

4.11 Applying this approach the Wind Farm Infrastructure has been assessed as not having a significant impact for the vast majority of receptors. In addition, given the distance of the WFDA from shore, significant landscape and seascape impacts were not considered likely and did not require further assessment (as confirmed in the Scoping Opinion).

4.12 In so far as project alone potential significant effects are predicted, these relate to one aspect of commercial fisheries focused on the eastern area of the WFDA. **Chapter 11: Commercial Fisheries** of the **Bellrock WFDA EIA Report (Volume II)** sets out in detail impacts on commercial fisheries. As explained in **Chapter 11: Commercial Fisheries** of the **Bellrock WFDA EIA Report (Volume II)**, the Applicant has identified a range of measures that, if implemented, would reduce impacts from the Wind Farm Infrastructure further so that these would not be significant. Although it is not possible at this stage to take these measures into account in the formal assessment of impacts (due to the requirement to follow the realistic "worst case" scenario approach), it is expected there will be measures available to further reduce impacts on commercial fisheries.

4.13 **Chapter 10** of the **Bellrock WFDA EIA Report (Volume II)** identifies a significant residual cumulative effect during operation on razorbill populations in terms of disturbance and displacement impact. However, as the Chapter notes, this conclusion should be treated with caution and is highly precautionary. The levels of predicted impact are an inevitable consequence of the WFDA being far offshore, given the approach that has been used to determine the cumulative impact (which follows the NatureScot advice provided to the Applicant). This is because the regional populations are defined by the breeding colonies within the breeding season foraging range of the WFDA, but this encompasses very few razorbill colonies which means that the regional population is small. However, this is not accounted for in the calculation of the breeding season cumulative mortality, which is derived from all projects within the razorbill foraging range of the WFDA. Most of these projects are closer to the coast than the WFDA and so have potential connectivity with a much larger razorbill population. As such it should be noted that the contribution of the Bellrock WFDA to the cumulative total is very small, representing less than 1% of predicted mortality across all relevant projects.

4.14 Nevertheless, the approach which is used assumes that all of the potential mortality from these projects during the breeding season is attributed to the small regional population that has been defined in relation to the WFDA. This results in the Population Viability Analysis predicting a population effect substantially larger than can actually be the case. When the applied foraging range is increased to reduce this bias, this results in a marked reduction (c. 50%) in the scale of the increase in mortality.

Habitat Regulations Assessment and Derogation Case

4.15 The HRA process, including derogation, is explained above. As explained there and set out in the RIAA (**Volume VI**), AEoSI could not be ruled out from the Wind Farm Infrastructure in combination with other projects for 7 SPAs.

4.16 In addition, it is recognised that Scottish Ministers could be minded to reach different conclusions regarding the SPAs (and associated qualifying features) for which an AEoSI cannot be excluded. Therefore, the in-principle compensation makes allowance, without prejudice, for additional compensation requirements for:

- SPAs identified for which no potential for an AEoSI is concluded but for which the determinations for the Berwick Bank, Green Volt, West of Orkney or Salamander projects were unable to exclude an Adverse Effect on Site Integrity; and
- SPAs identified for which the conclusion of no potential for an AEoSI relies on the fact that the impacts from the Bellrock Wind Farm Infrastructure alone are considered to be so small as to make it biologically implausible for them to make a meaningful contribution to the in-combination effects.

4.17 Details on the derogation case, including the legislation and policy underpinning the need and approach to derogation, is set out in the Derogation Report (**Volume VI**).

4.18 In summary, where a plan or project may have an AEoSI on a designated site the Competent Authority may authorise that plan or project where certain criteria can be met:-

- There must be no alternative to the project, having regard to its objectives. This should consider a wide range of alternatives, from "do nothing" to site selection and design changes;
- There are Imperative Reasons of Overriding Public Interest ("IROPI") as to why the project should be allowed to proceed. The range of reasons will include (i) human health, (ii) public safety or (iii) beneficial consequences of primary importance to the environment. It can also include any other reason the Competent Authority (i.e. Scottish Ministers) consider to be an imperative reason of overriding public interest. On this latter point, Scottish Ministers have concluded in the context of other recently consented offshore wind farms that "*an immediate need to increase energy supply from offshore renewables both for energy security reasons and as a key contribution towards mitigate against climate change"* is an imperative reason of overriding public interest[10]; and
- That suitable compensatory environmental measures can be put in place to ensure the coherence of the UK's network of designated sites.

[10] Berwick Bank Derogation Decision, Scottish Ministers June 2025 (berwick bank wind farm - derogation case assessment - redaction.pdf)

4.19 The Derogation Report sets out in detail how the Wind Farm Infrastructure meets each of these criteria:-

- It demonstrates that there are no alternatives to the Wind Farm Infrastructure to meet the relevant objectives;
- The Derogation Report also demonstrates how the Wind Farm Infrastructure will play a central role in advancing energy transition objectives, addressing climate change, and driving regional economic growth within the green economy. It will contribute to Scotland's and the UK's legally binding climate change targets by helping to decarbonise the UK's energy supply, whilst contributing to the essential tasks of ensuring security of supply and providing low-cost energy for consumers, in line with Scottish and UK Government policy; and
- A range of compensatory measures are detailed in the appendices to the Derogation Report. This includes, (i) mammalian predator control and management, (ii) fisheries management via bycatch reduction, (iii) measures to control human disturbance at bird breeding colonies and (iv) management of breeding habitats.

4.20 The Scottish Government is proposing to introduce a mechanism to enable developers to contribute to compensation measures that are being developed at a strategic level. This would be delivered through a Scottish Marine Recovery Fund ("SMRF"), to which developers would contribute, with the SMRF implementing (or overseeing the delivery of) compensation measures. Based on the information published to date, the Applicant considers that the SMRF could provide an appropriate mechanism for the Bellrock Wind Farm Infrastructure to meet compensation requirements.

4.21 Overall, the Derogation Report demonstrates that the Wind Farm Infrastructure meets the relevant tests for derogation, and that Scottish Ministers as Competent Authority can grant the Bellrock WFDA Consent applications.

5. Relevant Legislation

5.1 This section of the Planning Statement provides a summary of the legislation relevant to the determination of the Bellrock WFDA Consent applications.

5.2 The Wind Farm Infrastructure Consent applications will be considered on the following basis:-

- The application for the s.36 Consent will be determined under the Electricity Act 1989; and
- The application for the Marine Licence will be determined under the Marine and Coastal Access Act 2009.

S.36 Consent

5.3 The Applicant has applied for a generation licence under the Electricity Act 1989 and expect this to be granted by mid-2026. As a licence holder, Paragraph 3 of Schedule 9 of the Electricity Act 1989 will require the Applicant, in the formulation of its proposals, to have regard to "*the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest" (*Paragraph 3(1)(a) Schedule 9 of the Electricity Act 1989).

5.4 Paragraph 3(1)(b) requires the Applicant to "*do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*".

5.5 Scottish Ministers in their determination of the s.36 Consent Application are under similar duties to the Applicant, and shall have regard to the extent to which the Applicant has complied with its duty to do what it reasonably can to mitigate impacts.

5.6 The duties under Schedule 9 are not to preserve the qualities of the environmental assets recorded in Schedule 9, but to have regard to the desirability of doing so. The duty to mitigate impacts is not that all impacts must be avoided, but to do what is reasonable to mitigate impacts.

5.7 The Wind Farm Infrastructure has been designed through an iterative process that has been fully informed by the environmental assessments set out in the Bellrock EIA Report (**Volume II**), shadow HRA (**Volume VI**) and shadow ncMPA Assessment (**Volume VII**) which support the Bellrock WFDA Consents applications.

5.8 The Applicant has had full regard to all the factors listed in terms of paragraph 3(1)(a) of Schedule 9 of the 1989 Act, and has also sought to do what it reasonably can to mitigate the effects on that list of matters in terms of paragraph 3(1)(b).

Marine Licence

5.9 Scottish Ministers have devolved authority for the determination of the Marine Licence Consent application under the Marine and Coastal Access Act 2009.

5.10 Section 58 of the 2009 Act requires Scottish Ministers (as public authority) to *"take any authorisation or enforcement decision in accordance with the appropriate marine policy documents, unless relevant considerations indicate otherwise*".

5.11 The "*appropriate marine policy documents*" are identified in terms of s.59 of the 2009 Act and comprise:-

- The UK Government's Marine Policy Statement 2011; and
- Scotland's National Marine Plan 2015.

5.12 The Scottish Government's Sectoral Marine Plan for Offshore Wind Energy 2020 (SMP) is not an *appropriate marine policy document* for the purposes of s.59 of the 2009 Act, but is considered a relevant consideration in the Scottish Minister's decision making process.

5.13 These policy documents are considered in more detail in section 6 of this Planning Statement.

5.14 Section 69(1) of the 2009 Act also requires Scottish Ministers (as licensing authority) when determining an application for a marine licence to have regard to the need to:-

- Protect the environment,
- Protect human health,
- Prevent interference with legitimate uses of the sea, and
- Such other matters as Scottish Ministers consider relevant.

5.15 Whilst different statutory provisions apply to the determination of the Bellrock WFDA Consent applications, the assessment of these applications will involve consideration of similar issues, in particular, consideration of the benefits that will be delivered by the Wind Farm Infrastructure as part of the Bellrock Project as well as its potential impacts.

5.16 Other Legislation relevant to the determination of the Bellrock WFDA Consent applications includes:-

Table 4: Other Legislation

Legislation	**Relevance**
Climate Change Act 2008 (as amended by the and Climate Change Act 2008 (2050 Target Amendment) Order 2019)	The Climate Change Act 2008 set legally binding targets for the UK to reduce CO_2 emissions by at least 80% by 2050, from 1990 levels. This was amended by the Climate Change Act 2008 (2050 Target Amendment) Order 2019 which introduced a target for at least 100% reduction in greenhouse gas emissions (compared to 1990 levels) in the UK by 2050.
Climate Change (Scotland) Act 2009 Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 Climate Change (Emissions Reduction Targets) (Scotland) Act 2024	The Climate Change (Scotland) Act 2009 was implemented to reduce greenhouse gas emissions in Scotland by at least 80% by 2050. The Climate Change (Annual Targets) (Scotland) Order 2011 outlines the targets for 2023 - 2027. The Climate Change (Scotland) Act 2009 and The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 accelerated Scotland's overall target in the 2009 Act to net zero by 2045. In November 2024, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 modified the Climate Change (Scotland) Act 2009 to introduce limits on the amount of greenhouse gas emissions emitted in Scotland over a five-year period.

Legislation	Relevance
	This replaced the requirements for annual targets as outlined in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 with a system of targets based on carbon budgets. The overall legally binding target of net zero by 2045 remains in place.
Energy Act 2004	The Energy Act 2004 implemented statutory decommissioning requirements for offshore renewable energy installations and associated transmission infrastructure and a Safety Zone scheme.
Marine (Scotland) Act 2010	Although the Wind Farm Infrastructure applications are for development outside 12 nm and consent under this Act is not needed, it is relevant to the assessment of the Southern Trench ncMPA.
Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017	These regulations set out the requirements for environmental impact assessment in respect of applications for consent under s.36 of the Electricity Act 1989. The Regulations have been applied in the undertaking of the EIA Report in respect of the S.36 Consent application.
Marine Works (Environmental Impact Assessment) Regulations 2007	These regulations set out the requirements for environmental impact assessment in respect of applications for a marine licence under the Marine and Coastal Access Act 2009. The Regulations have been applied in the undertaking of the EIA Report in respect of the Marine Licence applications.
Conservation of Habitats and Species Regulations 2017 Conservation of Offshore Marine Habitats and Species Regulations 2017 (collectively known as “the Habitats Regulations”).	The Conservation of Habitats and Species Regulations 2017 apply to apply to the S.36 Consent application. The Conservation of Offshore Marine Habitats and Species Regulations 2017 apply to the Marine Licence application. The Regulations have been applied in the undertaking of HRA and RIAA in respect of the Bellrock WFDA Consent applications.

5.17 Further detail on relevant legislation can be found in **Chapter 2: Policy and Legislative Context** of the **Bellrock WFDA EIA Report (Volume II)**.

6. Relevant Policy

6.1 This section of the Planning Statement provides a summary of policy documents relevant to the determination of the Bellrock WFDA Consent applications.

6.2 As noted above, the National Marine Plan and Marine Policy Statement both have statutory status as *"appropriate plans"* (as defined by the Marine and Coastal Access Act 2009) in the determination of the Wind Farm Infrastructure Consent applications. A variety of other policy documents are also considered relevant and are summarised in this section of the Planning Statement.

Marine Policy Statement 2011

6.3 Marine Policy Statement (MPS) was published by the UK Government in 2011 and has been jointly adopted by the Scottish and UK Governments. The MPS provides the policy framework for the marine planning system within the UK, and the context for the marine plans, including the National Marine Plan.

6.4 Marine plans and individual consenting decisions affecting the marine environment must accord with the MPS, unless relevant considerations indicate otherwise.

6.5 The MPS (Box 1) sets out *The high level marine objectives:-*

- Achieving a sustainable marine economy;
- Ensuring a strong, heathy and just society;
- Living within environmental limits;
- Promoting good governance; and
- Using sound science responsibly.

6.6 Setting out the position in 2011, the MPS noted that:-

"*The UK has some of the best wind resources in the world and offshore wind will play an important and growing part in meeting our renewable energy and carbon emission targets and improving energy security by 2020, and afterwards towards 2050*" and that "*Expansion of the offshore wind supply is likely to require significant investment in new high-value manufacturing capability with potential to regenerate local and national economies and provide employment*" (MPS para 3.3.19).

National Marine Plan 2015

6.7 Scotland's National Marine Plan (SNMP) was published by the Scottish Government in 2015, and prepared to accord with the MPA. The SNMP sets out strategic policies and objectives for the sustainable development of Scotland's marine resources out to 200 nm.

6.8 The SNMP contains general policies, described in the SNMP as:-

"a core set of General Policies (Chapter 4) which apply across all existing and future development and use of the marine environment. These General Policies are intended to represent the characteristics against which the sustainability of development and use is considered. They are presented under the five guiding principles of sustainable development to represent the balance required between social, economic and environmental imperatives. The General Policies apply to all plan making and decision making in the marine environment. These policies provide a clear overarching framework for all activity and more detailed policies in the sector chapters should be read as subject to the General Policies."

6.9 Chapter 11 of the SNMP sets out the detailed policies for the Offshore Wind and Marine Renewable Energy sector.

6.10 An assessment against the SNMP is provided below.

Sectoral Marine Plan 2020

6.11 The Sectoral Marine Plan (SMP) for Offshore Wind Energy identified sustainable areas for the future development of commercial-scale offshore wind energy in Scotland, including a spatial strategy to inform the ScotWind seabed leasing process for the purposes of offshore wind energy, and was developed in accordance with the SNMP.

6.12 Through the identification of Plan Option Areas, the SMP sought to:-

"contribute to the achievement of Scottish and UK energy and climate change policy objectives and targets, through the provision of a spatial strategy to inform the seabed leasing process for commercial offshore wind energy in Scottish waters, which:

- *minimises the potential adverse effects on other marine users, economic sectors and the environment resulting from further commercial-scale offshore wind development; and*
- *maximises* opportunities *for economic development, investment and employment in Scotland, by identifying new opportunities for commercial scale offshore wind development, including deeper water wind technologies."*

6.13 The SMP identified Plan Option areas as area with potential for sustainable offshore wind development.

6.14 The WFDA is located within the E1 Plan Option area and identified as an area suitable in principle for floating offshore wind development.

6.15 Scottish Ministers are currently undertaking a review of the SMP for offshore wind. The consultation on the plan review was completed during the course of 2025 and the updated SMP is anticipated to be published later in 2026.

Terrestrial Policy

6.16 The Wind Farm Infrastructure is located in the offshore marine environment and does not include any onshore/terrestrial development. As such, policies relating to terrestrial planning do not directly apply. That said, it is recognised that National Planning Framework 4 (NPF4), as the principal document of Scottish Government on planning policy matters, is relevant to Scottish Ministers consideration of the Wind Farm Infrastructure Consent applications.

7. Assessment of the Wind Farm Infrastructure Consent Applications

7.1 This section of the Planning Statement considers the needs case for the Bellrock Project and Wind Farm Infrastructure before considering assessing the Bellrock WFDA Consent applications against the key policies and requirements of the relevant legislation.

Need for the Bellrock Project

7.2 The Wind Farm Infrastructure is being brought forward within an area of the marine environment expressly identified by Scottish Government in its SMP as having potential for the sustainable delivery of commercial scale offshore wind.

7.3 Several key themes underpin the need for the Bellrock Project:-

- Climate Change, Net Zero, and Decarbonisation: Supporting national efforts to meet climate and net zero targets, contributing to the global fight against climate change;
- Security of Supply: Enhancing energy independence by reducing reliance on imported energy sources;
- Affordability of Supply: Delivering energy at the lowest possible cost to consumers; and
- Socioeconomic Benefits: Promoting stable employment and stimulating local economic growth through increased investment.

Climate Change, Net Zero and Decarbonisation

7.4 Recognising the risks posed by climate change and the need to achieve net zero and decarbonise the Scottish and UK economies, successive Scottish and UK Governments have put in place legally binding climate change targets.

7.5 As reflected in both the Scottish Government's offshore wind policy statement and the UK Government's CP 2030, offshore wind has a key role to play in meeting these legally binding targets.

Security of Supply

7.6 Security of energy supply is a critical issue for Scotland and the UK, playing a vital role in safeguarding public health and safety, while also supporting economic growth. Scotland significantly contributes to the UK's energy system, which supplies energy to the National Electricity Transmission System.

7.7 The necessary decarbonisation of the Scottish and UK energy supply chain and increasing electricity demand could result in a significant deficit in UK electricity supply compared with demand and, therefore, there is a clear public benefit inherent in the creation of new electricity supply capacity.

7.8 The Wind Farm Infrastructure will help deliver a larger energy supply from Scotland, meeting existing and increased demand, and reducing the reliance on imported energy supplies, and the associated geo-political vulnerabilities.

Affordability of Supply

7.9 The offshore wind industry is continuing to drive cost reductions through technology development. The Bellrock Project, including the Wind Farm Infrastructure, will contribute to this process as it seeks to make use of the most effective new technology and to take advantage of potential cost efficiencies in the development process. The Bellrock Project will be able to provide significant electricity generation capacity within Scotland and the UK to support commitments for offshore wind generation.

7.10 Floating offshore wind will lower prices in the long run, and as one of the early GW-scale projects, the Bellrock Project will make an important contribution to the long-term reduction in costs (ORE Catapult, 2024). The increase in Scottish and UK based energy supply will reduce reliance on volatile energy price markets for fossil fuels. (Energy and Climate Intelligence Unit, 2025). The Bellrock Project and other floating offshore wind projects in general are likely to have an even greater displacement impact because their capacity factor is higher than any other renewables technology.

7.11 The increase in Scottish and UK based energy supply may also help reduce exposure to fluctuations in energy prices.

Socioeconomic Benefits

7.12 The Bellrock Project will provide significant socioeconomic benefits to coastal communities, and also the potential to drive growth at both regional and national levels. The Bellrock Project, alongside other offshore wind farms in the region will help attract investment, support workforce training, and enable the development of operation and maintenance hubs and supply chains, fostering economic resilience and innovation across Scotland. These benefits will contribute directly to national objectives for a Just Transition, energy resilience and inclusive growth

7.13 During the development and construction phase, the Bellrock Project is expected to generate £845 million GVA in Scotland, and £1,439 million GVA across the UK. During construction, peak employment is expected in 2032 with around 4,560 jobs supported in that year across the UK, of which 2,900 jobs are within Scotland. These include both direct employment by the Bellrock Project and its contractors, as well as indirect employment within the wider supply chain. Additionally, induced impacts arise from employee spending within the wider economy.

Need for the Project - Summary

7.14 The need for additional offshore wind is recognised and supported at both Scottish and UK Government level.

7.15 In this context, the Bellrock WFDA is located within a Plan Option area already identified by Scottish Ministers in the SMP as an area of sea that is acceptable in principle for sustainable offshore wind development. The principle of offshore wind development within the WFDA is therefore established.

7.16 The Wind Farm Infrastructure, as part of the Bellrock Project, will make a significant contribution to meeting legally binding climate change targets, as well as addressing needs in terms of security and affordability of energy supply. The Bellrock Project will make a significant contribution socioeconomic contribution at a local, Scottish and UK level. The need for the Wind Farm Infrastructure is therefore established.

Assessment of the Bellrock WFDA Consent Applications – Legislation and Policy

7.17 For the reasons set out above, development of the Wind Farm Infrastructure already benefits from significant policy support via the SMP. The assessment set out below is therefore focussed on the detail of the Bellrock WFDA Consent applications.

7.18 The s.36 Consent and Marine Licence applications are to be determined under different legislation. However, the key considerations and approach to assessment of the two applications are aligned.

7.19 The table below contains an assessment of the Wind Farm Infrastructure Consent applications against the relevant policies in the SNMP as the "*appropriate"* plan in terms of s.58 of the Marine and Coastal Access Act 2009.

Table 5: SNMP Policy Assessment

Policy	Requirement	Comment
GEN 1 General Planning Principle	There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of the SNMP.	This is an overarching policy. The Wind Farm Infrastructure is development consistent with the policies and objectives in the SNMP and therefore accords with this policy.

Policy	Requirement	Comment
GEN 2 Economic Benefit	Sustainable development and uses which provide economic benefits to Scottish communities are encouraged when consistent with the policy and objectives of the SNMP.	**Chapter 16** of the **Bellrock WFDA EIA Report (Volume II)** sets out the predicted economic benefits of the Bellrock Infrastructure, as well as the benefits to be accrued as part of the Bellrock Project. The proposal accords with this policy.
GEN 3 Social Benefit	Sustainable development and use which provides social benefits is encouraged when consistent with the policy and objectives of the SNMP.	**Chapter 16** of the **Bellrock WFDA EIA Report (Volume II)** sets out the predicted economic benefits of the Wind Farm Infrastructure, as well as the benefits to be accrued as part of the Bellrock Project. The Bellrock Project will also make a significant contribution to address climate change and providing low carbon electricity to both displace existing non-renewable forms of energy generation as well as meeting new demand. The proposal accords with this policy.
GEN 4 Co-existence	Proposals which enable co-existence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision making processes, when consistent with the policies and objectives of the SNMP	The **Bellrock WFDA EIA Report** includes detailed assessments of the potential impacts of the Wind Farm Infrastructure on other users of the sea. Through careful design and mitigation measures, it has been demonstrated that the Wind Farm Infrastructure will co-exist with other development sectors (such as fishing and shipping) and activities (such as other renewable energy development). The proposal accords with this policy.
GEN 5 – Climate Change	Marine planners and decision makers must act in the way best calculated to mitigate and adapt to climate change.	The Wind Farm Infrastructure will help deliver enough renewable energy to supply over 1.7 million homes. A detailed assessment of the carbon impacts and greenhouse gas savings is set out in **Chapter 17** of the **Bellrock WFDA EIA Report (Volume II).** The proposal accords with this policy.
GEN 6 – Historic Environment	Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.	The Bellrock WFDA is located outside any areas designated as having historic environment interest. Assessment work to date has not identified any historic assets (e.g. wrecks) within the Bellrock WFDA.

Policy	Requirement	Comment
		The Applicant proposes that the Bellrock WFDA Consents include conditions requiring mitigation and reporting measures in the event heritage assets are identified. The proposal accords with this policy.
Gen 7 - Landscape/seascape	Marine planners and decision makers should ensure that development and use of the marine environment take seascape, landscape and visual impacts into account.	The Bellrock WFDA is located approximately 100 kilometres offshore and will have very limited/no visibility from land. It is also not located proximate to any commercial passenger ferry routes from which it could be observed. Given the location offshore of the Bellrock WFDA, the Wind Farm Infrastructure is not predicted to have any material landscape or seascape impacts. The proposal accords with this policy.
Gen 9 – Natural Heritage	Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects	The EIA Report, HRA and RIAA contain an assessment of potential impacts on protected areas and species setting. Where potential significant impacts have been identified the **Bellrock WFDA EIA Report (Volumes I to IV)**, **Bellrock RIAA (Volume VI)** and **Shadow Derogation case (Volume VI)** set out how impacts will be mitigated and compensation provided so as to ensure the status of Priority Marine Features will be protected. The proposal accords with this policy.
Gen 13 - Noise	Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects.	The **Bellrock WFDA EIA Report (Volume II)** contains an assessment of potential impacts of underwater noise on marine mammals and fish. This is set out in **Chapters 8** and **9** of the **Bellrock WFDA EIA Report (Volume II).** With the application of the identified mitigation measures, the EIA Report confirms that significant noise impacts will be avoided. The proposal accords with this policy.

Policy	Requirement	Comment
Gen 18 – Engagement	Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.	There has been extensive consultation with MD-LOT, SNCBs, stakeholders and interested parties. This is detailed in the pre-application consultation report (PAC) (**Volume IV**). The proposal accords with this policy.
Gen 19 – Sound Evidence	Decision making in the marine environmental will be based on sound scientific and socio-economic evidence.	The Bellrock WFDA Consent applications are supported by detailed evidence-based assessments undertaken in accordance with the relevant legislation, policy and guidance. The proposal accords with this policy.
Gen 21 – Cumulative impacts	Cumulative impacts affecting the ecosystem of the marine plan area should be addressed in decision making and plan implementation.	The EIA Report, HRA/RIAA and ncMPA are all supported by an assessment of potential cumulative impacts with relevant projects. The proposal accords with this policy.
Sector Specific Policies		
Fisheries 2 and Fisheries 3	The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on fishing; (i) cultural and economic importance of fishing; (ii) potential impact of marine developments on the sustainability of fish and shellfish stocks; (iii) environmental impact on fishing grounds; and (iv) potential effect of displacement on fish stocks, fuel costs to fishers. Where existing fishing opportunities or activity cannot be safeguarded, a Fisheries Management and Mitigation Strategy should be prepared by the proposer of development or use.	**Chapter 11 (Commercial Fisheries)** of the **Bellrock WFDA EIA Report (Volume II)** provides an assessment of potential impacts fishing. As detailed in **Chapter 11** of the **Bellrock WFDA EIA Report (Volume II)**, the Applicant will put in place a Fisheries Mitigation, Monitoring and Communication Plan in collaboration with fisheries to minimise impacts that cannot be avoided. The proposal accords with these policies.
Wild Fish 1	The impact of development and use of the marine environment on diadromous fish species should be considered in marine planning and decision-making processes.	Potential impacts on fish and shellfish (including salmon) has been considered in **Chapter 8** of the **Bellrock WFDA EIA Report (Volume II)**. With the application of appropriate mitigation, the EIA Report concludes that there will be no significant adverse impacts on fish and shellfish.

Policy	Requirement	Comment
		The proposal accords with these policies.
Transport 6	Marine planners and decision makers and developers should ensure displacement of shipping is avoided where possible to mitigate against potential increased journey lengths (and associated fuel costs, emissions and impact on journey frequency) and potential impacts on other users and ecologically sensitive areas.	Potential impacts on shipping and navigation has been considered in **Chapter 12** of the **Bellrock WFDA EIA Report (Volume II)**. With the application of appropriate mitigation, the **Bellrock WFDA EIA Report** concludes that there will be no significant adverse impacts on shipping and navigation. The proposal accords with this policy.
Renewable Sector Policies		
Renewables 1	Proposals for commercial scale offshore wind and marine renewable energy development should be sited in the Plan Option areas identified through the Sectoral Marine Plan process.	The WFDA is located within Plan Option area E1, as established by the SMP. The proposal accords with this policy.
Renewables 5	Marine planners and decision makers must ensure that renewable energy projects demonstrate compliance with Environmental Impact Assessment and Habitats Regulations Appraisal legislative requirements.	The Bellrock WFDA Consent applications are supported by the EIA Report, HRA, RIAA and Derogation documents. These have been prepared following extensive consultation with MD-LOT and others and in accordance with the relevant regulatory requirements. The proposal accords with this policy.
Renewables 7	Marine planners and decision makers should ensure infrastructure is fit for purpose now and in future.	As set out in **Chapter 4 (Project Description)** of the **Bellrock WFDA EIA Report (Volume II),** the Wind Farm Infrastructure has been designed and assessed to take account of both existing technology and that which is expected to become available for deployment. This will ensure the Bellrock Project can take advantage of advances in technology. The proposal accords with this policy.

Policy	Requirement	Comment
Renewables 8	Developers bringing forward proposals for new developments must actively engage at an early stage with the general public and interested stakeholders of the area to which the proposal relates and of adjoining areas which may be affected.	The Applicant has undertaken extensive pre-application consultation in respect of the Bellrock Project including Wind Farm Infrastructure. This is detailed in the pre-application consultation report (**Volume IV**). The proposal accords with this policy.
Renewables 10	Community benefit good practice guidance should be followed where appropriate.	The Applicant is committed to delivering community benefit and will continue to work with local authorities and stakeholders on community benefit proposals, taking account of emerging policy and good practice.

7.20 As detailed in the Bellrock WFDA Consents applications and summarised above, the Bellrock WFDA Consents applications accord with the relevant policies in the SNMP, which is an "appropriate plan" for the purposes of s.58 of the Marine and Coastal Access Act 2009. The granting of the Bellrock WFDA Consent applications would be in accordance with the appropriate plan.

Further Considerations - Assessment Against the Requirements of the Marine and Coastal Access Act and Electricity Act 1989

7.21 As well as assessment against *appropriate plans,* s.69(1) of the Marine and Coastal Access Act requires Scottish Ministers as licensing authority to have regard to the following factors:-

- The need to protect the environment;
- The need to protect human health;
- The need to prevent interference with legitimate uses of the sea; and
- Any such other matters as the Scottish Ministers consider relevant.

7.22 As noted above, Schedule 9 of the Electricity Act 1989 requires Scottish Ministers to have regard to:-

"*the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest" (*Paragraph 3(1)(a) Schedule 9 of the Electricity Act 1989) and to consider the extent to which an applicant has taken steps to reasonably "*mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*".

7.23 It is considered that these statutory requirements broadly align, such that compliance with the factors specified in the 2009 Act will demonstrate compliance with those in the 1989 Act. It is also the case that there is significant overlap between these factors and the matters relevant to the policies in the SNMP as detailed above.

7.24 Both the 2009 Act and 1989 Act require Scottish Ministers to have regard to the matters detailed in s.61 and Schedule 9 respectively. These is no obligation or requirement on an applicant or Scottish Ministers to meet any particular test or standard.

7.25 By reference to s.61 of the 2009 Act, the Planning Statement sets out below how the Applicant, in formulating the Bellrock WFDA Consent applications, has had regard to the statutory criteria.

The Need to Protect the Environment

7.26 The various assessments submitted with the Bellrock WFDA Consent applications (principally the Bellrock WFDA EIA Report) report on the potential effects on the environment.

7.27 Following consultation with MD-LOT and other stakeholders, assessment has been undertaken in respect of the relevant environmental receptors and reported in the EIA Report. For the purposes of s.69(1)(a) of the 2009 Act the relevant environmental factors are considered to be:-

- Benthic;
- Fish and Shellfish;
- Offshore Ornithology;
- Marine Mammals;
- Marine Water and Sediment Quality;
- Marine and Coastal Processes; and
- Marine Archaeology and Cultural Heritage.

7.28 The potential effects on each of these environmental factors are summarised in Table 3 above. In respect of each factor for the above receptors, the **Bellrock WFDA EIA Report (Volume II)** concludes that the residual effects of the Wind Farm Infrastructure alone will be "*not significant*".

7.29 The Wind Farm Infrastructure has been designed having regard to the need to protect the environment. Through the application of the mitigation hierarchy, potential impacts have been avoided where possible and otherwise mitigated.

7.30 As well as project specific impacts, the Scottish Ministers' obligation to have regard to the need to protect the environment must take account of the potential impacts of climate change on the environment.

The Need to Protect Human Health

7.31 For the purposes of s.69(1)(b) of the 2009 Act impacts relevant to the protection of human health are considered in the following EIA Report chapters:-

- Marine Geology, Oceanography and Physical Processes;
- Shipping and Navigation;
- Aviation and Radar;
- Marine Infrastructure and Other Users;
- Socioeconomics, Tourism and Recreation;
- Greenhouse Gas Assessment; and
- Major Accidents and Disasters.

7.32 The assessments in respect of Shipping and Navigation, Aviation and Radar and Marine Infrastructure and other users all conclude there will be no significant adverse impacts.

7.33 In respect of major accidents and disasters (**Chapter 19** of the **Bellrock WFDA EIA Report (Volume II)**), the EIA Report sets out how embedded and tertiary mitigation measures will minimise impacts. Secondary mitigation measures will be secured by conditions in the Bellrock WFDA Consents. The residual impacts are considered to be minimal and not significant.

7.34 Significant socioeconomic effects are predicted, including significant employment and inward investment during the construction and operation of the Wind Farm Infrastructure.

7.35 The Bellrock Project (including the Wind Farm Infrastructure) will provide significant amounts of renewable energy to both replace the greenhouse gas emissions from existing energy production and help ensure future demand is met from renewable sources. The **Bellrock WFDA EIA Report (Volume II)** confirms that the Bellrock Project will deliver significant benefits in respect of the reduction in greenhouse gas emissions over the lifetime of the Bellrock Project.

7.36 As well as project specific impacts, the Scottish Ministers' obligation to have regard to the need to protect human health must take account of the potential impacts of climate change on the environment.

The Need to Prevent Interference with Legitimate Uses of the Sea

7.37 For the purposes of s.69(1)(c) of the 2009 Act the factors considered relevant to preventing interference with legitimate users of the sea are considered to be:-

- Commercial Fisheries;
- Shipping and Navigation;

- Aviation and Radar; and
- Marine Infrastructure and Other Users.

7.38 In respect of shipping and navigation, aviation and radar and marine infrastructure and other users, the EIA Report reports that there will be no significant impacts on these factors. The **Bellrock WFDA EIA Report (Volume II)** sets out how embedded and tertiary mitigation measures will minimise impacts. Secondary mitigation measures will be secured by conditions in the Bellrock WFDA Consents.

7.39 In accordance with Fisheries Policy 3 of the SNMP, a Fisheries Mitigation, Monitoring and Communication Plan will be put in place to ensure impacts are minimised as far as possible, and to enable the Applicant to work with fishers to identify measures to reduce impacts further.

Summary - Assessment Against the Requirements of the Marine and Coastal Access Act 2010 and Electricity Act 1989

7.40 The Wind Farm Infrastructure Consent applications contain the information necessary to enable Scottish Ministers to fulfil their statutory duties under s.69 of the 2010 Act in respect of the matters to which they must have regard.

7.41 The Wind Farm Infrastructure has been developed and designed with regard to the need to (i) protect the environment, (ii) protect human health and (iii) prevent interference with legitimate uses of the sea.

7.42 The statutory duties in the 1989 Act are framed differently, but are, in essence, the same. As is clear from the conclusions in the EIA Report, the Applicant has had regard to the desirability of:-

"*preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest".*

The EIA Report details the extensive mitigation measures the Applicant has taken to mitigate effects.

National Planning Framework 4 (NPF4) (2023)

7.43 NPF4 sets out the long-term spatial strategy for Scotland and national planning policies and forms part of the statutory development plan for terrestrial planning decision made under the Town and Country Planning (Scotland) Act 1997. Although not directly applicable to the determination of the Wind Farm Infrastructure Consent applications, it is considered relevant as the statement of national policy.

7.44 NPF4 states that:-

"*The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change. We will need to respond to a growing nature crisis, and to work together to enable development that addresses the social and economic legacy of the coronavirus pandemic, the cost crisis and longstanding inequality*."

7.45 NPF4 states that:-

"the global climate emergency and the nature crisis formed the foundations for the spatial strategy as a whole".

7.46 Reflecting this approach, Policy 1 of NPF4 states that "*significant weight"* is to be given to addressing the global climate and nature crises when considering development proposal.

7.47 Policy 11 is the principal policy for renewable development. The Policy Intent of that policy is stated to be:-

"*to encourage, promote and facilitate all forms of renewable energy development onshore and offshore".*

7.48 NPF4 identifies 18 national developments which support the delivery of the spatial strategy and for which there is in principle support for the development. The Bellrock Project falls within National Development 3 - Strategic Renewables Electricity Generation and Transmission Infrastructure.

8. Conclusion

8.1 This Planning Statement has been prepared in support of the Bellrock WFDA Consents applications and to assist Scottish Ministers in their assessment and determination of the applications.

8.2 The Bellrock WFDA is located within a Plan Option area identified in the Scottish Government's SMP as an area with potential for sustainable offshore wind farm development, and for which there is in principle support.

8.3 As detailed in this Planning Statement and the **Bellrock WFDA EIA Report (Volume II)**, the potential effects from the Wind Farm Infrastructure on the environment, human health and other users of the sea, have been properly and carefully considered. This Planning Statement also outlines how the Wind Farm Infrastructure has been developed and designed in accordance with the principles of the mitigation hierarchy, so as to ensure impacts are avoided and mitigated where possible.

8.4 The Bellrock Project will deliver a significant amount of renewable energy with limited adverse environmental impacts. No significant adverse environmental impacts are reported across the vast majority of key issues, including but not limited to marine mammals, fish and shellfish, shipping and navigation, aviation and landscape and visual impacts.

8.5 The majority of seabird species will experience negligible or minor effects. There is predicted to be a significant impact on razorbill during operation only when considered cumulatively with other offshore

wind farms. However, the contribution of the Wind Farm Infrastructure to this impact is very low, and the Wind Farm Infrastructure itself will not have a significant adverse impact on any seabird species.

8.6 It is recognised that the loss of access for UK demersal otter trawl fleet targeting Nephrops (using TR2 gear) to a small part of the Devil's Hole Nephrops fishing ground is a moderate significant impacts in EIA terms. This is a precautionary assessment. The Applicant has, and will continue to, work with the fishing industry to address and reduce impacts.

8.7 The Bellrock Project and Wind Farm Infrastructure, will make a significant contribution to meeting Scotland's and the UK's legally binding climate change targets, as well as helping address the need of energy security, by providing significant amounts of Scottish and UK based energy generation.

8.8 The Bellrock Project will make a significant contribution to the local, Scottish and UK economies. During the development and construction phase, the Bellrock Project is expected to generate £845 million GVA in Scotland, and £1,439 million GVA across the UK. During construction, peak employment is expected in 2032 with around 4,560 jobs supported in that year across the UK, of which 2,900 jobs are within Scotland. These include both direct employment by the Bellrock Project and its contractors, as well as indirect employment within the wider supply chain. Additionally, induced impacts arise from employee spending within the wider economy.

8.9 The Bellrock WFDA Consent applications comply with the relevant requirements of both the Electricity Act 1989 and the Marine and Coastal Access Act 2009 and should be granted.

9. References

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