Bellrock Offshore Wind Farm

Wind Farm Development Area

Volume V

Outline Environmental Management Plan

Date: April 2026

Document Number: BFN_BEL_CST_PLN_0001

Revision Number: 1

Classification: Public

Revision History

Rev.	Prepared by	Checked By	Approved By	Date
1	Haskoning	ES	BMcG	01/04/2026

This page is intentionally blank

Contents

List of Tables

Glossary of Terminology

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

Term	Definition
Development Area	For consenting purposes, the area for which separate consents and/or Marine Licences will be sought by the Applicant, comprising: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Dynamic inter-array cable	The section of inter-array cable between the floating substructure and the seabed, which is designed to accommodate the dynamic movement of the floating substructure.
Floating offshore unit	The combined wind turbine generator and floating substructure.
Floating substructure	A floating structure which provides buoyancy and, in conjunction with the station keeping system, supports a superstructure (e.g. wind turbine generator or offshore substation), and maintaining its position within the structure's excursion limit.
Inter-array cable	Armoured cable containing electrical and fibre optic cores, which link the wind turbine generators to each other and to the subsea cable hubs and/or the offshore substations and include dynamic inter-array cable and static inter-array cable sections.
Offshore substation	An offshore platform which houses electrical equipment such as transformers, switchgear, and protection and control systems, enabling the wind farm's renewable electricity to be received via inter-array cables and exported via the offshore export cables.
Offshore Transmission Development Area	The boundary within which the Offshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned (and includes the whole of the Wind Farm Development Area).
Offshore Transmission Infrastructure	Infrastructure located within the Offshore Transmission Development Area including fixed bottom and/or floating offshore substations, offshore reactive compensation station(s) and associated scour protection; interconnector cables and associated cable protection; and offshore export cables and associated cable protection (including activities associated with the Offshore Transmission Infrastructure construction, operation and maintenance, and decommissioning).
Onshore Transmission Development Area	The boundary within which the Onshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned.
Onshore Transmission Infrastructure	Infrastructure located within the Onshore Transmission Development Area including transition joint bay(s); onshore export cables; onshore substation; temporary construction compounds; temporary working areas; environmental mitigation areas; drainage/irrigation infrastructure; access works; and any other associated infrastructure (including activities associated with the Onshore Transmission Infrastructure construction, operation and maintenance, and decommissioning).
Safety Zone	An area of water around or adjacent to a floating offshore unit which is to be constructed, extended, operated or decommissioned, from which certain or all classes of vessels are excluded and within which activities can be regulated for the purpose of securing safety of the floating offshore unit or vessel in that vicinity, and individuals on the floating offshore unit and vessel, in line with Section 95 of the Energy Act 2004.

Term	Definition
ScotWind	A Crown Estate Scotland leasing round for offshore wind projects in which the process enabled developers to apply for seabed rights to plan and build wind farms in Scottish waters.
Scour protection	Protective material positioned around anchors to avoid sediment being eroded as a result of the flow of water.
Static inter-array cable	The section of inter-array cable that is not designed to move.
Station keeping system	The system (including mooring lines and anchors) used to hold a floating offshore unit within its excursion limit and maintain the intended orientation of the floating offshore unit.
Subsea cable hub	A subsea device, with a gravel pad foundation, which allows the connection of multiple inter-array cables.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned.
Wind Farm Infrastructure	Infrastructure located within the Wind Farm Development Area including wind turbine generators; floating substructures, station keeping systems and associated scour protection; inter-array cables and associated cable protection; subsea cable hubs; and ancillary infrastructure including buoys (including activities associated with the Wind Farm Infrastructure construction, operation and maintenance, and decommissioning).
Wind turbine generator	A wind turbine generator converts wind energy into electrical energy. The main components include rotor assembly (composed of three blades and a hub); nacelle (containing the generator, shaft and gearbox, power electronic converter and transformer); and a tower (containing lifting equipment and switchgear).

Glossary of Abbreviations

Term	Definition
DP	Decommissioning Programme
ECoW	Environmental Clerk of Works
EIA	Environmental impact assessment
EMP	Environmental Management Plan
FMMCP	Fisheries Mitigation, Monitoring, and Communication Plan
FOU	Floating offshore unit
FSS	Floating substructure
IAC	Inter-array cables
INNSMP	Invasive Non-native Species Mitigation Plan
ISEP	Institute of Environmental and Sustainability Professionals
LMP	Lighting and Marking Plan
MD-LOT	Marine Directorate Licensing Operations Team
MMMP	Marine Mammal Mitigation Protocol
MPCP	Marine Pollution Contingency Plan
O&M	Operation and maintenance
OfTDA	Offshore Transmission Development Area
PAD	Protocol for Archaeological Discoveries
PEMP	Project Environmental Monitoring Plan
QHSE	Quality, Health, Safety, and Environment
s.36	Section 36
UXO	Unexploded ordnance
VMNSP	Vessel Management and Navigational Safety Plan
WFDA	Wind Farm Development Area
WSI	Written Scheme of Investigation

1 Introduction

1.1 Background

1. In 2021, Crown Estate Scotland launched the ScotWind[1] leasing round which released areas of seabed in Scottish waters for new commercial scale offshore wind developments to help Scotland achieve its net-zero emissions target by 2045. In January 2022, Bellrock Offshore Wind Farm Limited (the Applicant[2]) was successfully awarded development rights for an area of seabed, to develop the Bellrock Wind Farm Development Area (WFDA), which forms part of the Bellrock Offshore Wind Farm (the Bellrock Project).

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

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

1.2 Purpose and Scope

3. This Outline Environmental Management Plan (EMP) (has been prepared by Haskoning on behalf of the Applicant and accompanies a Section 36 (s.36) Consent application[3] and a Marine Licence application[4] submitted to Marine Directorate – Licensing Operations Team (MD-LOT) on behalf of the Scottish Ministers, for the construction, operation and maintenance (O&M) of the Bellrock Wind Farm Infrastructure located within the Bellrock WFDA.

4. This Outline EMP sets out the overarching framework for environmental management of all offshore works associated with the Bellrock Wind Farm Infrastructure during the construction and O&M phases. Decommissioning will be subject to its own regulatory approval and licensing

[1] The ScotWind leasing round was initiated based on the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020), which identified a number of sustainable areas for future commercial-scale offshore wind development, and provided the spatial strategy to support CES's ScotWind leasing round.

[2] The term 'Applicant' is used throughout this plan, reflecting the application stage of the Bellrock WFDA, and is interchangeable with the term 'Developer'.

[3] Submitted under the Electricity Act 1989.

[4] Submitted under the Marine and Coastal Access Act 2009.

process, therefore decommissioning is not within the scope of this Outline EMP. Legislation referred to in this Outline EMP is as subsequently amended and as currently in force as at the date of this Plan.

5. This Outline EMP will form the basis of the final EMP and has been prepared with reference to relevant industry guidance, including:

- Institute of Sustainability and Environmental Professionals (ISEP) Guidance on Environmental Management Plans (ISEP, 2008);
- Guidance on Applying the Waste Hierarchy (Scottish Government, 2017);
- Offshore Renewable Energy – Accidental Deposit of an Object at Sea: Form and Guidance (Scottish Government, 2024a); and
- Marine European Protected Species and Basking Sharks: Licensing (Scottish Government, 2024b).

6. The final EMP will be developed, finalised, and adopted by the Applicant post-consent, prior to the commencement of construction, and will be submitted to the Scottish Ministers for approval, in accordance with the conditions of the s.36 Consent and Marine Licence. The approved EMP will apply to all personnel, contractors, and subcontractors undertaking activities in relation to the Bellrock Wind Farm Infrastructure, who will be required to comply with the requirements of the approved EMP at all times.

7. Environmental management during decommissioning of the Bellrock Wind Farm Infrastructure will be addressed through a separate Decommissioning Programme (DP), prepared in accordance with Section 105(2) of the Energy Act 2004 and the Decommissioning of Offshore Renewable Energy Installations in Scottish Waters or in the Scottish Part of the Renewable Energy Zone under the Energy Act 2004: Guidance Notes for Industry (in Scotland) (Scottish Government, 2022), or any successor guidance applicable at the time of decommissioning. Decommissioning will be subject to its own regulatory approval and licensing process. As such, decommissioning is not within the scope of this Outline EMP, which applies to the construction and O&M phases of the Bellrock Wind Farm Infrastructure only.

1.3 Aims and Objectives

8. The primary aim of this Outline EMP is to establish the framework through which the environmental mitigation and monitoring measures identified in the Bellrock WFDA Environmental Impact Assessment (EIA) Report will be delivered to avoid or reduce potential adverse environmental effects throughout the construction and O&M phases of the Wind Farm Infrastructure. It also provides guidance for incident responses, outlining procedures and reporting chains to ensure clarity for project personnel and effective communication with relevant authorities.

9. The objectives of this Outline EMP are to:

- Describe the Bellrock Wind Farm Infrastructure and outline the measures that will be applied to prevent, reduce, or otherwise manage the potential environmental effects throughout the

construction and O&M phases of the Wind Farm Infrastructure, identified through the **Bellrock WFDA EIA**; and

- Set out the overarching framework for environmental monitoring[5].

10. The final EMP will be prepared following the granting of consent and will be in place prior to the commencement of construction. The approved EMP will be subject to review and, where necessary, revision before implementation during the O&M phase to ensure that environmental management measures remain appropriate to the activities being undertaken.

11. As the project progresses, the approved EMP may be updated to reflect any additional environmental requirements or refined management measures relevant to construction and/or O&M (please see **Section 4**).

12. This Outline EMP solely relates to the Bellrock Wind Farm Infrastructure located within the Bellrock WFDA. The Bellrock Offshore Transmission Infrastructure is not included within this Bellrock WFDA Outline EMP but will be subject to a separate EMP submitted in support of the Bellrock OfTDA Marine Licence application.

1.4 Document Structure

13. The structure of this Outline EMP is detailed in **Table 1.1**. The Outline EMP is divided into two main parts with one establishing the overarching framework for environmental management, and the other setting out the environmental mitigation and monitoring measures that will be developed and secured through the approved EMP and associated management plans.

Table 1.1: Structure of the Outline Environmental Management Plan

Section	Title	Description
1	Introduction	This section sets out the purpose, scope, aims, and objectives of the Outline EMP, identifies relevant documents, and explains how the Outline EMP will be secured and implemented through the consenting process.
2	Legislation, Policy, and Guidance	This section summarises the key legislation, policy, and guidance relevant to the environmental management of offshore renewable energy operations.
3	Overview of the Bellrock WFDA	This section provides a summary of the Bellrock Wind Farm Infrastructure.
4	Environmental Management Framework	This section describes the overarching framework that will be used to control environmental risks, including roles and responsibilities, communication and reporting procedures, training and competence, auditing, and management of environmental mitigation and monitoring measures.

[5] In addition to the objectives detailed in **Section 1.3**, the final EMP will be developed to effectively discharge the relevant conditions of the s.36 Consent and Marine Licence.

Section	Title	Description
5	Environmental Impacts and Control Measures	This section outlines the key environmental aspects associated with construction and O&M activities, and the mitigation and monitoring measures that the Applicant will implement to avoid and reduce environmental impacts.

1.5 Relevant Documents and Plans

14. This Outline EMP forms part of a wider suite of management plans that will be prepared in relation to the Bellrock Wind Farm Infrastructure. These documents will be secured, where required, through conditions attached to the s.36 Consent and Marine Licence.

15. **Appendix 5.1: Mitigation and Monitoring Register** of the **Bellrock WFDA EIA Report (Volume IV)** identifies the management plans anticipated to be required, based on the mitigation and monitoring measures set out in the Bellrock WFDA EIA Report.

16. Several finalised management plans have been submitted with the Bellrock WFDA s.36 Consent and Marine Licence applications in line with MD-LOT's guidance on mitigation and monitoring plans (Scottish Government, 2025). These management plans contain sufficient detail to support the assessment and determination of consent and are intended to be approved through the application process without the need for post-consent update prior to the commencement of construction.

17. In addition, several outline management plans have been submitted where detailed measures will be finalised post-consent and approved in accordance with relevant consent conditions.

18. **Table 1.2** summarises the management plans that are relevant to this Outline EMP.

Table 1.2: Consent Management Plans Relevant to the Outline EMP

Management Plan	Status of Management Plan at Application	Purpose and Relevance to the Outline EMP
Fisheries Mitigation, Monitoring, Communication Plan (FMMCP)	Full	The FMMCP describes the mitigation, monitoring and communication that will be put in place by the Applicant across the construction and O&M phases of the Bellrock Wind Farm Infrastructure to avoid or minimise adverse effects.
Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD)	Full	The WSI and PAD describes the measures that will be put in place across the construction and O&M phases of the Bellrock Wind Farm Infrastructure to avoid or minimise adverse effects on marine archaeology and cultural heritage receptors.
Marine Pollution Contingency Plan (MPCP)	Full	The MPCP sets out procedures, responsibilities and response measures that will be implemented to prevent, manage, and respond to accidental pollution incidents associated with the Bellrock Wind Farm Infrastructure during the construction and O&M phases.

Management Plan	Status of Management Plan at Application	Purpose and Relevance to the Outline EMP
Invasive Non-native Species Mitigation Plan (INNSMP)	Full	The INNSMP sets out the mitigation, control, and monitoring measures that will be implemented to avoid or minimise the risk of introducing or spreading marine invasive non-native species during construction and O&M of the Bellrock Wind Farm Infrastructure. The INNSMP identifies key pathways and critical control points and defines proportionate control measures to manage invasive non-native species risk.
Vessel Management and Navigational Safety Plan (VMNSP)	Outline	The VMNSP sets out the measures to be implemented to ensure navigational safety and effective vessel management during construction and O&M of the Bellrock Wind Farm Infrastructure. The VMNSP also sets out the framework for managing and coordinating project-related vessel movements.
Lighting and Marking Plan (LMP)	Outline	The LMP sets out the proposed marine Aids to Navigation for the Bellrock Wind Farm Infrastructure during construction and O&M, including the type, location, and timing of lighting and marking measures to support safe navigation.
Marine Mammal Mitigation Protocol (MMMP)	Outline	The MMMP provides the framework for marine mammal mitigation for construction activities generating underwater noise, including piling, geophysical surveys, and unexploded ordnance clearance.
Project Environmental Monitoring Plan (PEMP)	Not submitted with consent Applications	The need/inclusion of any detailed monitoring of environmental effects during the construction and O&M of the Bellrock Wind Farm Infrastructure will be determined post-consent and would be designed to understand knowledge gaps at the time commencement. If monitoring is included, this may be through contribution to a strategic/regional programme, or if undertaken at a Project and will be captured in a PEMP.
Piling Noise Mitigation Plan	Not submitted with consent Applications	The Piling Noise Mitigation Plan sets out the measures that will be implemented to minimise the potential effects of piling noise on marine mammals and fish during the construction phase of the Bellrock Wind Farm Infrastructure.
Inter-array Cable Plan	Not submitted with consent Applications	The Inter-array Cable Plan sets out detail on environmental sensitivities and design and installation considerations to mitigate, as far as practicable, the effects of inter-array cable laying and associated protection during construction and O&M of the Bellrock Wind Farm Infrastructure.
Construction Programme	Not submitted with consent Applications	The Construction Programme sets out the proposed schedule for commencement, mobilisation, and sequencing of construction works, contingency arrangements for delays, and the planned date for final commissioning.
Construction Method Statement	Not submitted with consent Applications	The Construction Method Statement sets out the construction approach, including commencement dates, duration, phasing, working areas, construction procedures, and good working practices. It also defines the roles, responsibilities, and the chain of command during construction works.

Management Plan	Status of Management Plan at Application	Purpose and Relevance to the Outline EMP
Operation and Maintenance Plan	Not submitted with consent Applications	The Operation and Maintenance Plan will set out the procedures and good working practices for O&M of the wind turbine generators, floating substructures (FSSs), and other Wind Farm Infrastructure as required. Environmental sensitivities which may affect the timing of the O&M activities will be considered in the OMP.
Decommissioning Programme (DP)	Not submitted with consent Applications	The Decommissioning Programme (DP) is a management plan outlining the process to retire the physical facilities of the Bellrock Wind Farm Infrastructure inclusive of activities undertaken, the structures involved and associated physical and environmental management procedures. A DP will be submitted in accordance with a section 105 notice of the Energy Act 2004.

1.6 Consent Compliance

19. The approved EMP will satisfy the requirements of the relevant conditions of the s.36 Consent and Marine Licence for the Bellrock Wind Farm Infrastructure once granted.

20. **Table 1.3** will be populated once the final consents, and associated conditions are available.

Table 1.3: Consent Conditions to be Discharged by the Approved EMP

Consent/Licence Document	Condition Reference Number	Condition Description	How the Condition is Addressed
s.36 Consent	*[To be completed post-consent]*	*[To be completed post-consent]*	*[To be completed post-consent]*
Marine Licence	*[To be completed post-consent]*	*[To be completed post-consent]*	*[To be completed post-consent]*

1.7 Review and Change Management

21. The EMP shall be approved prior to the commencement of construction and will be reviewed at regular intervals throughout construction and O&M, and updated as necessary to reflect new information, changes in methods and procedures, or the adoption of improved environmental practices. The approved EMP will also be revised in response to findings, lessons learned, or the identification of new environmental sensitivities, in line with established change management procedures and best practice (ISEP, 2008).

22. Updates will be subject to review and approval before being implemented.

2 Overview of the Bellrock WFDA and Wind Farm Infrastructure

23. The Bellrock WFDA is located in Scottish offshore waters, in the central North Sea, and covers an area of 280 km^2. The Bellrock WFDA is situated 120 km east of Stonehaven and 116 km southeast of Peterhead.

24. A Bellrock WFDA description, including its location, boundaries, and environmental setting, is provided in Section 4.3 of **Chapter 4: Project Description** (**Volume II**) of the **Bellrock WFDA EIA Report**.

25. The Bellrock Wind Farm Infrastructure comprises:

- Up to 132 wind turbine generators with FSSs (together termed as a floating offshore unit (FOU));
- Station keeping systems for each FSS, including mooring lines, anchoring systems and ancillary elements;
- Scour protection for FSS anchoring points;
- Approximately 300 km of inter-array cables (IACs) comprising static and dynamic sections of IACs linking the individual FOU to subsea cable hubs or to the offshore substations[6];
- Associated cable protection as required;
- Up to 18 subsea cable hubs; and
- Ancillary infrastructure including buoys, other navigational markers and monitoring equipment.

26. A full description of the Bellrock Wind Farm Infrastructure is provided in Section 4.4 of **Chapter 4: Project Description** (**Volume II**) of the **Bellrock WFDA EIA Report**.

[6] Offshore substations within the geographical extent of the Bellrock WFDA will be consented as part of the Bellrock OfTDA and will be assessed as part of the Bellrock OfTDA EIA Report.

3 Environmental Management Framework

27. This section outlines the environmental management framework that will be followed by all parties involved in the construction and O&M of the Bellrock Wind Farm Infrastructure. The framework sets out how the environmental mitigation and monitoring measures identified by the Applicant in the **Bellrock WFDA EIA Report**, together with the consent condition requirements described in **Section 1.6**, will be implemented and managed. All project personnel must review and ensure compliance with the requirements of the environmental management framework and the approved EMP. The environmental management framework is provided under the following areas:

- Environmental roles and responsibilities;
- Communications and reporting; and
- Training and auditing.

3.1 Roles and Responsibilities

28. The approved EMP will define the specific roles and responsibilities of all personnel with responsibilities for environmental management during the construction and O&M of the Bellrock Wind Farm Infrastructure. This will ensure that environmental management measures are implemented effectively across all phases of work.

29. **Table 3.1** outlines the key roles that have been identified as likely to have responsibilities in relation to environmental management:

Table 3.1: Summary of the Likely Key Roles and Responsibilities Relevant to the Outline EMP

Role	Contact Information	Responsibilities
Project Director	*[To be completed post-consent]*	Responsible for ensuring compliance with and delivery of the approved EMP. Has overall responsibility for ensuring the Bellrock Wind Farm Infrastructure is constructed and operated with a view to protecting the environment, preventing pollution and minimising adverse environmental effects.
Quality, Health, Safety and Environment (QHSE) Lead	*[To be completed post-consent]*	Responsible for coordination, management and monitoring of QHSE matters as well as the provision of QHSE support, advice and guidance. Monitors performance of the Bellrock Wind Farm Infrastructure against environmental mitigation and monitoring measures and requirements.

Role	Contact Information	Responsibilities
Head of Construction	*[To be completed post-consent]*	Accountable for ensuring appropriate resources and management processes are in place across construction packages to manage environmental risk and achieve compliance with the approved EMP. Ensures environmental requirements are embedded within construction reporting and communication processes. Provides input to environmental incident and non-compliance investigations and reporting, as required.
Marine Coordinator	*[To be completed post-consent]*	The Applicant will establish a Marine Coordination Centre, from which vessel movements and activities will be coordinated and monitored by the Marine Coordinator. Further details on this role are set out in the Marine Pollution Contingency Plan (MPCP) (**Volume V** of the **Bellrock WFDA EIA Report**).
Consents Lead	*[To be completed post-consent]*	Leads the team responsible for ensuring compliance with all relevant consents and environmental legislation. Provides oversight and coordination across all phases to maintain a consistent approach to compliance and environmental management. Acts as the primary point of contact with key stakeholders, including MD-LOT and other statutory bodies. Oversees the process for securing new consents and updating existing documentation as required.
Package Leads	*[To be completed post-consent]*	To support the QHSE Lead focussed to the specific package. Responsible for ensuring sufficient resources and processes are in place across the work packages to manage environmental risk and ensure compliance with the approved EMP. To ensure that any corrective actions arising from environmental incidents and/or non-compliances are implemented.
Environmental Clerk of Works (ECoW)	*[To be completed post-consent]*	Responsibilities include reviewing and quality checking consent plans and programmes, and monitoring compliance with these under the Section 36 (s.36 Consent and Marine Licence. Responsible for reporting compliance matters to the Applicant and, where required by consent conditions, to MD-LOT or other stakeholders. Provides ongoing advice, monitoring and reporting in relation to consent compliance, and ensures that mitigation and monitoring set out in the EIA Report is implemented. Also delivered environmental training to relevant personnel and undertakes regular environmental reporting.
Stakeholder Engagement Manager	*[To be completed post-consent]*	Responsible for facilitating engagement with communities and relevant stakeholders throughout all phases of the Bellrock Wind Farm Infrastructure.

Role	Contact Information	Responsibilities
Retained Archaeologist	*[To be completed post-consent]*	Responsible for providing advice on all archaeological matters associated with the Bellrock Wind Farm Infrastructure that could affect marine archaeology and cultural heritage receptors. Acts as the primary point of contact between the Applicant and archaeological stakeholders in the event of a potential archaeological discovery. Further details on this role are set out in the WSI and PAD (**Volume V** of the **Bellrock WFDA EIA Report**).
Fisheries Liaison Officer	*[To be completed post-consent]*	Acts as the primary interface between the Applicant and the commercial fishing community throughout construction of the Bellrock Wind Farm Infrastructure. Further details on this role are set out in the Fisheries Mitigation, Monitoring, and Communication Plan (**Volume V** of the **Bellrock WFDA EIA Report**).
Contractors/Subcontractors	*[To be completed post-consent]*	All contractors and subcontractors are required to comply with the environmental standards and good practice set out in the EIA Report, approved EMP, and associated consent plans, ensuring their activities meet the stated requirements. Each contractor will appoint an Environmental Manager responsible for ensuring compliance with the approved EMP and supporting documents throughout construction and O&M, and for reporting the Applicant and ECoW.

3.2 Communication and Reporting

3.2.1 Internal Communication

30. Internal communication procedures are structured to support effective oversight of environmental risks and the effective implementation of mitigation measures throughout construction and O&M. Regular progress meetings and reporting arrangements are designed in accordance with industry best practice to ensure that environmental requirements set out in this Outline EMP, the Bellrock WFDA EIA Report and associated s.36 Consent and Marine Licence application documents, and relevant licence conditions are clearly communicated and followed. The detailed internal reporting arrangements will be defined in the approved EMP.

31. Routine review of Risk Assessment and Method Statements during these progress meetings ensures that all personnel remain aware of site-specific environmental risks and that control measures are applied and adjusted as needed.

3.2.2 External Communication

32. External communication will be undertaken in accordance with the conditions of the s.36 Consent and Marine Licence, and in line with the mitigation measures set out in **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** of the Bellrock WFDA EIA Report. Communication with MD-LOT and other relevant stakeholders is intended to maintain transparency and provide assurance of compliance with environmental requirements.

33. Specific external reporting requirements, including the frequency/timing of notifications, and the responsible parties, will be defined in the approved EMP. This will ensure that all regulatory and stakeholder reporting obligations are clearly documented and consistently applied throughout construction and O&M.

3.2.3 Environmental Incident and Non-compliance Reporting

34. Environmental incidents and instances of non-compliance will be identified, managed, and reported in accordance with the s.36 and Marine Licence conditions, as well as industry best practice (ISEP, 2008).

35. The detailed requirements for reporting, including notification timescales and communication channels, will be set out in the approved EMP. Contractors and subcontractors will be required to comply with these procedures throughout construction and O&M.

3.3 Training and Auditing

3.3.1 Training and Competence

36. Training is an essential component of environmental management and ensures that all relevant personnel understand and are competent in implementing the relevant measures set out in **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** of the Bellrock WFDA EIA Report, the approved EMP, and the requirements of the conditions set out in the s.36 Consent and the Marine Licence. Training will be tailored to the site-specific environmental sensitivities of the Bellrock WFDA and associated activities.

37. The QHSE Manager and the ECoW are anticipated to be responsible for delivering environmental training.

38. A range of training methods may be used, including:

- **Inductions:** Provided to all personnel involved in the construction and O&M of the Bellrock Wind Farm Infrastructure to communicate relevant requirements of the approved EMP, site-specific constraints, and safeguarding procedures;
- **Toolbox Talks:** Regular talks delivered by specialist personnel to provide updates on environmental procedures or address specific site issues. Additional talks may be scheduled in response to non-compliance with the approved EMP or unforeseen scenarios. Toolbox talks will cover a range of specific topics including (but not limited to), spills and use of spill kits, pollution, ecologically sensitive areas and associated habitats and species, fuel and refuelling,

archaeological areas, waste management and storage. The provision of environmental training will be audited on a regular basis;

- **Environmental training:** Will cover a range of specific topics including (but not limited to), spills and use of spill kits, pollution, ecologically sensitive areas, fuel and refuelling, archaeological areas, waste management and storage;
- **Lessons Learnt Sessions:** Conducted as appropriate to capture and share key learnings from project activities. The purpose of these sessions is to reinforce environmental awareness, improve procedures, and ensure continuous improvement; and
- **Environmental Awareness Materials:** Such as noticeboards displayed at the Marine Coordination Centre and on vessels to communicate key environmental risks, mitigation measures, emergency response locations, contact information for responsible personnel and reporting requirements.

39. The full suite of environmental training, including delivery methods, frequency, and responsible personnel, will be developed and detailed in the approved EMP.

3.3.2 Monitoring and Auditing

3.3.2.1 Mitigation Register

40. **Appendix 5.1: Mitigation and Monitoring Register (Volume IV)** of the Bellrock WFDA EIA Report has been developed based on the mitigation and monitoring measures identified in the Bellrock WFDA EIA Report. It will be maintained as a central record to track the implementation of all mitigation and monitoring measures and compliance with relevant consent conditions.

3.3.2.2 Audits

41. Audits will be undertaken at regular intervals, and as required, to verify that the procedures and requirements set out in the approved EMP and associated documents are being effectively implemented and understood by all relevant site personnel. The audit process will include the review of relevant environmental documentation, such as contactor key processers, Risk Assessment and Method Statements and any applicable licences or permits (e.g. European Protected Species licence).

42. Any instances of non-compliance will be evaluated to determine the appropriate corrective action and will be reported to relevant stakeholders as necessary. Records of audits and resulting actions will be maintained to provide an audit trial of compliance and continuous improvement.

43. The detailed audit programme, including frequency, scope, and responsibilities, will be established in the approved EMP.

4 Environmental Impacts and Control Measures

4.1 Marine Environmental Protection and Risk Management

4.1.1 Marine Pollution Prevention and Contingency Planning

44. Measures to prevent and respond to marine pollution incidents are set out in the MPCP (**Volume V**) of the **Bellrock WFDA EIA Report**) submitted as part of the Bellrock WFDA s.36 Consent and Marine Licence applications. The MPCP has been prepared in accordance with the MD-LOT guidance on mitigation and monitoring plans, as set out in Marine Licensing and Consenting: Offshore Renewables Energy Projects (Scottish Government, revised October 2025) and as such contains sufficient detail at the application stage to manage pollution risks associated with the Bellrock Wind Farm Infrastructure. The MPCP is intended to be approved as part of the s.36 Consent and Marine Licence process and will not require subsequent update prior to the commencement of construction.

4.1.2 Waste Management

45. Prior to the commencement of construction, contractors (and subcontractors) will be required to prepare site-specific Waste Management Plans for review and approval by the Applicant. The WMPs will be developed in line with the principles of the waste management hierarchy (Scottish Government, 2017) of:

- Prevention;
- Prepare for reuse;
- Recycle;
- Recover other value; and
- Disposal.

46. The aspects below are expected to be minimum requirements of the WMPs:

- Analysis of anticipated waste arisings and material surpluses;
- Specific waste management objectives;
- Methods for preventing, preparing for reuse, recycling, recovering other value, and disposing (as a last resort), of waste;
- Material handling, storage, and onward management procedures; and
- Workforce awareness and WMP dissemination.

47. The WMPs will be updated for the O&M phase of the Bellrock Wind Farm Infrastructure.

4.1.3 Fuels, Oils, and Chemicals

48. The management of fuels, oils, and chemicals during construction and O&M will be undertaken in accordance with all relevant legislation and guidance (as detailed in the MPCP (**Volume V** of the **Bellrock WFDA EIA Report**)). Detailed measures for delivery, storage, handling, spill prevention, and emergency response are set out in the MPCP (**Volume V** of the **Bellrock WFDA EIA Report)**.

49. Contractors, and subcontractors, will be required to comply with the MPCP as the overarching document, and any contractor-specific emergency response plans must be aligned with its requirements.

4.1.4 Dropped Objects

50. Any accidental deposit of objects at sea will be managed in accordance with the *Offshore Renewable Energy – Accidental Deposit of an Object at Sea: Form and Guidance* (Scottish Government, 2024a). Contractors and subcontractors will be required to follow these procedures.

4.1.5 UXO Management

51. Site preparation surveys will be undertaken prior to construction commencing to identify any potential UXO hazards within the Bellrock WFDA. Where UXO is detected, appropriate mitigation measures, including UXO clearance, UXO relocation, or Wind Farm Infrastructure micro-siting will be implemented.

52. UXO mitigation measures are detailed in the Outline Marine Mammal Mitigation Protocol (MMMP) (**Volume V** of the **Bellrock WFDA EIA Report**) to manage potential interactions with sensitive species during clearance activities.

53. Any UXO clearance works will require a separate Marine Licence, and where relevant, European Protected Species licensing requirements (**Section 4.2.2**).

54. Should additional UXO be discovered after the UXO survey and clearance programme has been completed, the Contractor will inform the Applicant's nominated point of contact immediately.

4.2 Marine Ecology and Nature Conservation

4.2.1 Marine Species

55. Procedures will be in place to ensure that any wildlife incident occurring during construction or O&M activities is recorded and escalated appropriately. This includes, for example, injury to a marine mammal, or observed fish mortality (particularly large elasmobranchs such as basking shark *Cetorhinus maximus*) or birds. Site personnel will report incidents as soon as practicable through the appropriate communication channels (see **Section 3.2.1**).

56. Information to be recorded, where available, will include:

- The activity underway at the time of the incident;
- The species involved;
- Relevant weather and tidal level conditions; and
- Photographic evidence where it is safe and practicable to obtain.

57. Incident reports will be reviewed internally and, where required, notification will be provided to the relevant regulators and/or statutory nature conservation body.

58. Measures to minimise risks to marine mammals, fish and birds are set out in the Outline MMMP (**Volume V** of the **Bellrock WFDA EIA Report**) and the Outline VMNSP (**Volume V** of the **Bellrock WFDA EIA Report**), both submitted with the Bellrock WFDA s.36 Consent and Marine Licence applications. These plans will be finalised post-consent, as required by consent conditions. In addition, a Piling Noise and Mitigation Plan will be developed and submitted to the Scottish Ministers prior to the commencement of construction, which will describe the measures that will be put in place to reduce the adverse effects of piling noise on marine mammals and fish.

59. A PEMP will also be implemented, in line with consent conditions, to coordinate post-consent monitoring of marine species. The PEMP will focus on understanding potential project-receptor interactions and addressing key evidence gaps. Monitoring results will inform adaptive management, as required, in consultation with regulators and statutory nature conservation bodies.

4.2.2 Species Licensing

60. Marine European Protected Species are protected throughout Scottish waters (0 to 200 nm). Activities with potential to cause injury or disturbance may require a licence from the licencing authority (MD-LOT) under the Conservation (Natural Habitats, &c.) Regulations 1994 within 0 to 12 nm, or the Conservation of Offshore Marine Habitats and Species Regulations 2017 between 12 and 200 nm (Scottish Government, 2024b).

61. Basking shark is protected between 0 and 12 nm under the Wildlife and Countryside Act 1981. As the Bellrock WFDA lies beyond 12 nm, a basking shark licence is not anticipated, but this will be reviewed as project details are confirmed.

62. Any required licences will be obtained prior to the commencement of the relevant works. Personnel will be informed of protected species requirements, and compliance with licence conditions will be monitored and reported as required.

4.2.3 Marine Invasive Non-Native Species

63. Measures to prevent the introduction and spread of marine invasive non-native species are set out in the INNSMP (**Volume IV** of the **Bellrock WFDA EIA Report**) submitted as part of the Bellrock WFDA s.36 Consent and Marine Licence applications. The INNSMP has been prepared in accordance with the MD-LOT guidance on mitigation and monitoring plans, as set out in Marine Licensing and Consenting: Offshore Renewables Energy Projects (Scottish Government, revised

October 2025) and as such contains sufficient detail at the application stage to manage invasive non-native species risks associated with the construction and O&M of the Bellrock Wind Farm Infrastructure. The INNSMP is intended to be approved as part of the s.36 Consent and Marine Licence process and will not require subsequent update prior to the commencement of construction.

4.3 Other Marine Environmental Considerations

4.3.1 Marine Archaeology and Cultural Heritage

64. A final WSI and PAD have been submitted with the Bellrock WFDA s.36 Consent and Marine Licence applications (**Volume V** of the **Bellrock WFDA EIA Report**), in line with MD-LOT guidance (Scottish Government, 2025). These documents set out measures and procedures to avoid or minimise adverse effects on marine archaeology and the historic environment, including actions to be taken if previously unrecorded material is encountered.

65. The WSI and PAD (**Volume V** of the **Bellrock WFDA EIA Report**) will be approved through the s.36 and Marine Licence process and will not require further updates and approval prior to the commencement of construction. All contractors will be required to comply with the relevant requirements.

4.3.2 Navigation, Vessel Management, and Other Sea Users

66. The management of navigational safety and interactions with other sea users is set out in the following plans submitted with the Bellrock WFDA s.36 Consent and Marine Licence applications:

- Outline VMNSP (**Volume V** of the **Bellrock WFDA EIA Report**);
- Outline Lighting and Marking Plan (LMP) (**Volume V** of the **Bellrock WFDA EIA Report**); and
- FMMCP (**Volume V** of the **Bellrock WFDA EIA Report**).

67. The FMMCP (**Volume V** of the **Bellrock WFDA EIA Report**), submitted as a final plan with the Bellrock WFDA s.36 Consent and Marine Licence applications in line with MD-LOT guidance (Scottish Government, 2025), sets out the mitigation, monitoring, and communication measures that will be implemented to avoid or minimise adverse effects on commercial fisheries.

68. The VMNSP and LMP (**Volume V** of the **Bellrock WFDA EIA Report**) are provided in outline with the Bellrock WFDA s.36 Consent and Marine Licence applications and will be finalised post-consent in accordance with consent conditions. These plans will guide the management of project vessels and infrastructure to ensure navigational safety and minimise disruption to other sea users.

69. Measures across these plans are likely to include:

- Adoption of Safety Zones;
- Appropriate notification of construction activities to other sea users;
- Appropriate charting of the Bellrock WFDA and Wind Farm Infrastructure;
- Appropriate marking and lighting of the Bellrock Wind Farm Infrastructure;
- A clear process of marine coordination of all vessels and vessel activity; and
- Appropriate marking and lighting of vessels.

5 References

Institute of Sustainability and Environmental Professionals (ISEP) 2008. Guidance on Environmental Management Plans.

Scottish Government (2017). Guidance on applying the waste hierarchy. Available at: https://www.gov.scot/publications/guidance-applying-waste-hierarchy/pages/3/.

Scottish Government (2020). Sectoral Marine Plan for Offshore Wind Energy. Available at: https://www.gov.scot/publications/sectoral-marine-plan-offshore-wind-energy/.

Scottish Government (2022). Decommissioning of Offshore Renewable Energy Installations in Scottish Waters or in the Scottish part of the Renewable Energy Zone under The Energy Act 2004. Guidance notes for industry (in Scotland). Available at: https://www.gov.scot/publications/offshore-renewable-energy-decommissioning-guidance-scottish-waters/.

Scottish Government (2024a). Offshore renewable energy – accidental deposit of an object at sea: form and guidance. Available at: https://www.gov.scot/publications/offshore-renewables-accidental-deposit-of-an-object-at-sea-form-and-guidance/.

Scottish Government (2024b). Marine European Protected Species and basking sharks: licensing. Available at: https://www.gov.scot/publications/marine-european-protected-species-and-basking-sharks-licensing/pages/eps-or-basking-shark-licence/.

Scottish Government (2025). Marine licensing and consenting: offshore renewable energy projects. Mitigation and monitoring plans. Available at: https://www.gov.scot/publications/marine-licensing-and-consenting-offshore-renewable-energy-projects/pages/mitigation-and-monitoring-plans/.

This page is intentionally blank

www.bellrockwind.co.uk