



THE CONSERVATION (NATURAL HABITAT, &c.) REGULATIONS 1994 (AS AMENDED)

LICENCE TO DISTURB MARINE SPECIES

Public Case Handling Report for Licence Number: EPS-00012352

Site	Bellrock Geophysical & Benthic Survey Area
Company	Bellrock Offshore Wind Farm Limited First Floor 2 Lochrin Square, 96 Fountainbridge, Edinburgh, Scotland, EH3 9QA
Brief Description of Project	Bellrock Offshore Wind Farm inshore geophysical survey
Associated Licences	

Species	harbour porpoise (<i>Phocoena phocoena</i>);bottlenose dolphin (<i>Tursiops truncatus</i>);minke whale (<i>Balaenoptera acutorostrata</i>);short beaked common dolphin (<i>Delphinus delphis</i>);white-beaked dolphin (<i>Lagenorhynchus albirostris</i>);fin whale (<i>Balaenoptera physalus</i>)
Inshore/Offshore	Inshore

TEST 1	Purpose of licence
	Imperative reasons of overriding public interest (including those of a social or economic nature and beneficial consequences of primary importance for the environment)
Comments	
The proposed activities meets the following specific needs by benefiting and addressing the following: Environmental – Producing renewable energy, reducing greenhouse gas emissions, supporting the need to met key climate objectives, including Scotland’s Net Zero goal for 2045 and renewables capacity targets, and wider UK emission reduction targets. Social and Economic – providing Scotland and the UK employment and supply chain opportunities Public Safety – Contributing to the UK energy security and therefore public safety, by contributing to a secure, domestic, and diversified energy supply, reducing the UK’s reliance on imported hydrocarbons Social and economic – The proposed activity will create jobs, stimulating local industries, and supporting the wider supply chain in manufacturing, engineering, and infrastructure in the local, Scottish and wider UK economy. 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. Should the surveys not take place Bellrock Offshore Wind Farm Ltd, would not have the data required to undertake the engineering design development thus preventing the submission of the marine licence application for the offshore transmission infrastructure. This leading to the development not progressing and the long-term national benefits including renewable energy delivery and contribution to Scotland's and the UK's GHG emissions reduction targets not being supported by this project. The survey will allow the proposed development to be progressed serving the public interest by delivering benefits to the environment through reducing Greenhouse Gas emissions, contribute to energy security and public safety, while delivering socio-economic benefits such as those detailed above. The proposed activities will allow for the progression of the Bellrock Offshore Wind Farm Ltd Development to produce renewable energy assisting with the Scotland’s Net Zero goal for 2045 and renewables capacity targets, and wider UK emission reduction targets. The project also supports overarching European, UK and Scottish policy requirement for sustainable energy supply from renewables. Being a strategically important offshore renewable energy infrastructure assisting with meeting statutory climate and energy policy commitments, and therefore align directly with relevant Scottish and UK policy frameworks. Although not undertaking a statutory function the proposed survey is supporting delivery of strategically important offshore renewable energy infrastructure required to meet statutory climate and energy policy commitments, and therefore align directly with relevant Scottish and UK policy frameworks.	
Test 1 satisfied?	YES

TEST 2	Satisfactory alternatives
Comments	
Alternative equipment has been looked at, such as autonomous underwater vehicles and unmanned vessels to inform the characteristics of the seabed but this will not produce the same results as the equipment proposed for this activity, the location is unsuitable for this equipment type and there is a higher cost level associated with its use. It is considered that at present the methods proposed (sub bottom profiler, side scan sonar, multibeam echo sounder etc) that might require an EPS are industry standard and that currently there are no alternative means of gathering the data provided by these methods. Surveying a smaller area is not a feasible option as full coverage is required to inform the engineering design and development of the Bellrock Offshore Transmission Infrastructure. The smallest survey area possible (an offshore export cable corridor within the OfTDA Area of Search) has been proposed. The smallest number of survey lines within this area and the minimum survey duration possible has been determined. Reducing the size of the survey area and/ or the number of survey lines any further would reduce data coverage quality and would not allow for the development to be progressed. Undertaking the surveys over multiple visits to reduce the survey time would increase disturbance as it would lengthen the overall duration of vessels and other activity onsite. It is not possible to reduce the survey period from the proposed time frame, as contingency is required to account for adverse weather impacts and the data required is needed to determine the most suitable potential locations for the Offshore Transmission Infrastructure and to inform the EIA. Consequently, the survey period has already been reduced to the minimum required to undertake the surveys effectively allowing for the required data to be acquired allowing for the development of the Bellrock Offshore Transmission Infrastructure. Should the survey works not be undertaken the Bellrock Offshore Transmission Infrastructure would be delayed in progress as the proposed activities are essential to inform the engineering design and development. Without the data provided from the survey there would not be sufficient information to progress the Offshore Transmission infrastructure with the required level of technical certainty. A do-nothing approach could delay or constrain the development of offshore renewable energy infrastructure and, in turn, reduce the potential long-term contribution of the project towards Scotland's Net zero ambitions. Therefore the do-nothing approach is not deemed to be a satisfactory alternative.	
Test 2 satisfied?	YES

TEST 3	Favourable conservation status
Comments	
The proposal will not have an adverse effect on the favourable conservation status of the EPS concerned, as long as the mitigation measures outlined are adhered to.	
Test 3 satisfied?	YES

Date application received: 08/05/2026

Consultation start date: 01/06/2026

Consultation end date: 29/06/2026

Notes

Date	title	Text
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National Marine Plan considerations:

The decision is: In accordance and no further action required

Comments: The proposed activity (part of the Bellrock Offshore Wind Farm) has been considered against the relevant policies of the National Marine Plan. The works are consistent with the Plan's objectives for sustainable development and use of the marine environment. In particular, the proposed activity aligns with the following general policies, GEN1 (General planning principle), GEN5 (Climate change), GEN9 (Natural heritage), GEN 13 (Noise), GEN19 (Sound evidence) and GEN21 (Cumulative impacts). The wider Bellrock Offshore Wind Farm also aligns with additional policies of the National Marine Plan. On this basis, the proposed activity are in accordance with the relevant policies of Scotland's National Marine Plan 2015.

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