Bellrock Offshore Wind Farm

Wind Farm Development Area

Environmental Impact Assessment Report - Volume IV

Appendix 5.1: Mitigation and Monitoring Register

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Glossary of Terminology

Term	Definition
Applicant	Bellrock Offshore Wind Farm Limited, the legal entity submitting Section 36 Consent and Marine Licence applications for the Bellrock Wind Farm Development Area.
Bellrock Offshore Wind Farm *(or the Bellrock Project)*	An offshore wind farm capable of exporting up to 1.8 GW of renewable energy to the National Electricity Transmission System. The Wind Farm Development Area is located 120 km east of Stonehaven, and will connect to the National Electricity Transmission System at the proposed SSEN Transmission Hurlie substation, west of Stonehaven in Aberdeenshire. The Bellrock Offshore Wind Farm comprises of the following Development Areas: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
National Electricity Transmission System	The high-voltage electricity power transmission network serving Great Britain which receives electricity from generators (such as offshore wind farms) and transmits that electricity to anywhere on the National Electricity Transmission System to satisfy demand.
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 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).
Scour protection	Protective material positioned around anchors to avoid sediment being eroded as a result of the flow of water.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned.

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

Glossary of Abbreviations

Term	Definition
ADD	Acoustic deterrent device
AEZ	Archaeological exclusion zone
CBRA	Cable Burial Risk Assessment
CMS	Construction Method Statement
COLREGs	Convention on the International Regulations for Preventing Collisions at Sea
DP	Decommissioning Programme
DSLP	Development Specification and Layout Plan
EIA	Environmental impact assessment
EMP	Environmental Management Plan
EPS	European Protected Species
ERCoP	Emergency Response Cooperation Plan
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FOU	Floating offshore unit
FSS	Floating substructure
H&S	Health and safety
IAC	Inter-array cable
IA-CaP	Inter-array Cable Plan
INNS	Invasive non-native species
INNSMP	Invasive Non-native Species Mitigation Plan
ISEP	Institute of Sustainability and Environmental Professionals
LMP	Lighting and Marking Plan
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate Licensing Operation Team
MMMP	Marine Mammal Mitigation Protocol

Term	Definition
MPCP	Marine Pollution Contingency Plan
NLB	Northern Lighthouse Board
NSP	Navigational Safety Plan
O&M	Operation and maintenance
OMP	Operation and Maintenance Plan
PAD	Protocol of Archaeological Discoveries
PNMP	Piling Noise Mitigation Plan
PTS	Permanent threshold shift
RRH	Remote Radar Head
RLoS	Radar Line of Sight
RMP	Radar Mitigation Plan
s.36	Section 36 of the Electricity Act 1989
SF_6	Sulphur hexafluoride
SOLAS	International Convention for the Safety of Life at Sea
SOMP	Seabed Obstruction Mitigation Plan
UXO	Unexploded ordnance
VMNSP	Vessel Management and Navigational Safety Plan
VMP	Vessel Management Plan
WFDA	Wind Farm Development Area
WSI	Written Scheme of Investigation
WTG	Wind turbine generator

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1 Introduction

1. Bellrock Offshore Wind Farm Limited (the Applicant) has adopted a series of mitigation and monitoring measures as part of the environmental impact assessment (EIA) process to avoid or reduce, where practicable, adverse effects on the environment during all phases of the Bellrock Wind Farm Infrastructure[1].

2. This Mitigation and Monitoring Register will serve as the primary tool for ensuring compliance with mitigation and monitoring measures presented within the Bellrock Wind Farm Development Area (WFDA) EIA Report.

3. This Mitigation and Monitoring Register will be maintained and periodically reviewed throughout the construction, operation and maintenance (O&M), and decommissioning phases of the Bellrock Wind Farm Infrastructure.

4. Mitigation and monitoring measures have been informed through **Appendix 1.2: Bellrock WFDA Scoping Opinion (Volume IV)**, ongoing consultation with key stakeholders during the EIA process and the Applicant's and EIA team's experience. Further information on the stakeholder consultation process is found in **Chapter 5: EIA Methodology (Volume II)**.

5. This document includes information with regards to management plans (in line with Scottish guidance (Marine Directorate, 2025), primary, secondary and tertiary mitigation measures (see **Section 2**) and monitoring measures identified throughout the EIA process. Together, these elements provide a comprehensive framework for managing environmental effects throughout the lifespan of the Bellrock Wind Farm Infrastructure.

6. These mitigation and monitoring measures are detailed within the relevant technical chapters associated with the Bellrock WFDA EIA Report and summarised below. For the justification and rationale of the implementation of each mitigation measure, refer to the relevant technical assessments listed below for full details:

   - **Chapter 6: Physical Geology, Oceanography and Marine Processes (Volume II);**
   - **Chapter 7: Benthic Ecology (Volume II);**
   - **Chapter 8: Fish and Shellfish Ecology (Volume II);**
   - **Chapter 9: Marine Mammals (Volume II);**
   - **Chapter 10: Offshore Ornithology (Volume II);**
   - **Chapter 11: Commercial Fisheries (Volume II);**
   - **Chapter 12: Shipping and Navigation (Volume II);**

[1] Mitigation and monitoring measures for the Bellrock Offshore Transmission Infrastructure will be addressed within the Bellrock Offshore Transmission Development Area consent application; and those for the Bellrock Onshore Transmission Infrastructure will be addressed within the Bellrock Onshore Transmission Development Area consent application.

- **Chapter 13: Aviation and Radar (Volume II);**
- **Chapter 14: Marine Infrastructure and Other Users (Volume II);**
- **Chapter 15: Marine Archaeology and Cultural Heritage (Volume II);**
- **Chapter 16: Socioeconomics, Tourism and Recreation (Volume II);**
- **Chapter 17: Greenhouse Gas Assessment (Volume II);**
- **Chapter 18: Climate Change Risk (Volume II);** and
- **Chapter 19: Major Accidents and Disasters (Volume II).**

2 Types of Mitigation

7. As set out in **Chapter 5: EIA Methodology (Volume II)**, the assessment has been undertaken in accordance with the mitigation hierarchy, whereby measures are designed to avoid, prevent, reduce, or where necessary, offset potential adverse effects (ISEP[2], 2024). In line with the approach advocated by ISEP (ISEP[2], 2024), primary and tertiary mitigation are treated as embedded mitigation measures which are integral to the design, construction, O&M or decommissioning of the Bellrock Wind Farm Infrastructure.

8. Primary mitigation is inherently incorporated into the project design whilst tertiary mitigation comprises compliance with existing legislative requirements and standard sectoral practices implemented as a matter of course. Accordingly, primary and tertiary mitigation are taken as implemented in the assessment of effects (**Chapters 6 to 19 (Volume II)** of the Bellrock WDA EIA Report). Effects that would only arise in the absence of these embedded mitigation measures are therefore not identified as potential effects, as there is no credible pathway for such effects to occur.

9. A distinction between potential and residual effects is only made where secondary mitigation is required to reduce the severity of an effect. In such cases, the assessment in technical **Chapters 6** to **19 (Volume II)** of the Bellrock WDA EIA Report) presents the significance prior to the application of secondary mitigation and the residual effect following its implementation. This approach ensures a clear and proportionate EIA Report.

10. The three types of mitigation applied within the Bellrock WFDA EIA Report are defined below.

- **Primary mitigation:** Measures that 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:** Measures that will require further activity to achieve the anticipated outcome. The effectiveness of such measures have been assessed within the Bellrock WFDA 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.
- **Tertiary mitigation:** Measures that would occur irrespective of the Bellrock WFDA EIA. These include measures 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 an Environmental Management Plan (EMP).

[2] At the time this guidance was published, the ISEP was operating under its former name, the Institute of Environmental Management and Assessment. The organisation has since rebranded to the Institute of Sustainability and Environmental Professionals in 2025.

3 Plans and Programmes

11. All plans and programmes[3] submitted alongside the Section 36 (s.36) Consent and Marine Licence applications for the Bellrock Wind Farm Infrastructure include sufficient information and should not require updating or approval after consents and licences have been granted. In line with Marine Directorate's mitigation and monitoring plan guidance (2025), the following full plans are submitted with the s.36 Consent and Marine Licence applications:

- Fisheries Mitigation, Monitoring, and Communication Plan (FMMCP) **(Volume V)**;
- Invasive Non-native Species Mitigation Plan (INNSMP) **(Volume V)**;
- Marine Pollution Contingency Plan (MPCP) **(Volume V)**; and
- Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) **(Volume V)**.

12. Additionally, several outline plans are also submitted alongside the s.36 Consent and Marine Licence applications for the Bellrock Wind Farm Infrastructure to provide an outline of the mitigation measures proposed within the plan. However, due to project parameters which are unavailable at the application stage, these outline plans will be updated and finalised post-consent. The following outline plans are submitted:

- Outline EMP **(Volume V)**;
- Outline Lighting and Marking Plan (LMP) **(Volume V)**;
- Outline Marine Mammal Mitigation Protocol (MMMP) **(Volume V)**; and
- Outline Vessel Management and Navigational Safety Plan (VMNSP) **(Volume V)**.

13. **Table 3.1** sets out the full list of plans and programmes referred to in the Bellrock WFDA EIA Report.

14. Other plans in addition to those listed in **Table 3.1** will be submitted to Marine Directorate – Licensing Operations Team (MD-LOT) post-consent as required. The final suite of plans required, and their associated contents, will be determined by consent conditions attached to the Bellrock WFDA s.36 Consent and Marine Licence.

[3] Excluding outline plans.

Table 3.1: Overview of Plans and Programmes to Support the Bellrock Wind Farm Development Area

Plan/Programme	Purpose	Submitted with the s.36 Consent and Marine Licence Applications or Post-consent
Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) **(Volume V)**	The FMMCP (previously known as the Fisheries Management and Mitigation Strategy) 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 of the Bellrock Wind Farm Infrastructure on commercial fisheries.	Submitted to the Scottish Ministers for approval with the s.36 Consent and Marine Licence applications. Provided in **Volume V** of the Bellrock WFDA EIA Report.
Written Scheme of Investigation (WSI and Protocol for Archaeological Discoveries (PAD) **(Volume V)**	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.	Submitted to the Scottish Ministers for approval with the s.36 Consent and Marine Licence applications. Provided in **Volume V** of the Bellrock WFDA EIA Report.
Marine Pollution Contingency Plan (MPCP) **(Volume V)**	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.	Submitted to the Scottish Ministers for approval with the s.36 Consent and Marine Licence applications. Provided in **Volume V** of the Bellrock WFDA EIA Report.
Invasive Non-native Species Mitigation Plan (INNSMP) **(Volume V)**	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 (INNS) 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 INNS risk.	Submitted to the Scottish Ministers for approval with the s.36 Consent and Marine Licence applications. Provided in **Volume V** of the Bellrock WFDA EIA Report.
Marine Mammal Mitigation Protocol (MMMP) **(Volume V)**	The MMMP provides the framework for marine mammal mitigation for construction activities generating underwater noise, including piling, geophysical surveys, and unexploded ordnance clearance (UXO).	An Outline MMMP is included in **Volume V** of the Bellrock WFDA EIA Report. A full MMMP will be developed post-consent and submitted to the Scottish Ministers for approval, via the Piling Noise Mitigation Plan, prior to the commencement of construction.
Vessel Management and Navigational Safety Plan (VMNSP) **(Volume V)**	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.	An Outline VMNSP is included in **Volume V** of the Bellrock WFDA EIA Report. A full VMNSP will be developed post-consent and submitted to the Scottish Ministers for approval prior to the commencement of construction.

Plan/Programme	Purpose	Submitted with the s.36 Consent and Marine Licence Applications or Post-consent
Lighting and Marking Plan (LMP) **(Volume V)**	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.	An Outline LMP is included in **Volume V** of the Bellrock WFDA EIA Report. A full LMP will be developed post-consent and submitted to the Scottish Ministers for approval prior to the commencement of construction.
Environmental Management Plan (EMP) **(Volume V)**	The EMP sets out the framework for environmental management measures that will be implemented during construction and O&M of the Bellrock Wind Farm Infrastructure to minimise environmental effects.	An Outline EMP is included in **Volume V** of the Bellrock WFDA EIA Report. A full EMP will be developed post-consent and submitted to the Scottish Ministers for approval prior to the commencement of construction.
Emergency Response Cooperation Plan (ERCoP)	The ERCoP will describe the measures that will be put in place during the construction and O&M of the Bellrock Wind Farm Infrastructure to assist and enable search and rescue and other emergency response procedures.	Submitted to the Scottish Ministers for approval via the VMNSP, which will address all the recommendations of the Maritime and Coastguard Agency (MCA) in Marine Guidance Note 654 (MCA, 2021).
Development Specification and Layout Plan (DSLP)	The DSLP sets out the proposed design and layout specification for the Bellrock Wind Farm Infrastructure within the Bellrock WFDA, providing a clear overview of key design elements and spatial arrangements.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction.
Piling Noise Mitigation Plan (PNMP)	The PNMP 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.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction.
Inter-array Cable Plan (IA-CaP)	The IA-CaP sets out detail on environmental sensitivities and design and installation considerations to mitigate, as far as practicable, the effects of inter-array cable (IAC) laying and associated protection during construction and O&M of the Bellrock Wind Farm Infrastructure.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction.
Construction Programme	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.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction. The potential to discharge the requirement for the Construction Programme and the Construction Method Statement (CMS) through the submission of a single document will be explored post-consent.

Plan/Programme	Purpose	Submitted with the s.36 Consent and Marine Licence Applications or Post-consent
Construction Method Statement (CMS)	The CMS 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.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction. The potential to discharge the requirement for the Construction Programme and the CMS through the submission of a single document will be explored post-consent.
Operation and Maintenance Plan (OMP)	The OMP will set out the procedures and good working practices for O&M of the wind turbine generators (WTG), floating substructures (FSS), 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.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction.
Decommissioning Programme (DP)	The DP is a 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.	Will be submitted to the Scottish Ministers for approval, as required under section 106 of the Energy Act 2004, prior to the commencement of construction.
Project Environmental Monitoring Plan	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.	Will be submitted to the Scottish Ministers for approval prior to the commencement of construction.
Seabed Obstruction Mitigation Plan (SOMP)	The SOMP would be submitted after the completion of post-construction surveys or inspections. The SOMP will describe any risks to legitimate users of the sea that have been found during the cable surveys or inspections and identify measures to reduce any risks.	The SOMP will be submitted to the Scottish Ministers for approval once cable laying has been completed.
Radar Mitigation Plan (RMP)	The RMP sets out measures to avoid or reduce impacts on radar systems during construction and O&M of the Bellrock Wind Farm Infrastructure.	The RMP (if required) will be submitted to the Scottish Ministers for approval post-consent.

4 Mitigation and Monitoring Measures

15. **Table 4.1** details each mitigation and monitoring measures presented within each technical EIA chapter, and which project phase they relate to (i.e. construction, O&M or decommissioning).

Table 4.1: Mitigation and Monitoring Measures for the Bellrock Wind Farm Development Area

Measure ID	Project Phase: Construction	Project Phase: Operation and Maintenance	Project Phase: Decommissioning	Mitigation and Monitoring Measure	EIA Topic: Marine Geology, Oceanography and Physical Processes	EIA Topic: Benthic Ecology	EIA Topic: Fish and Shellfish Ecology	EIA Topic: Marine Mammals	EIA Topic: Offshore Ornithology	EIA Topic: Commercial Fisheries	EIA Topic: Shipping and Navigation	EIA Topic: Aviation and Radar	EIA Topic: Marine Infrastructure and Other Users	EIA Topic: Marine Archaeology and Cultural Heritage	EIA Topic: Socioeconomics, Tourism and Recreation	EIA Topic: Greenhouse Gas Assessment	EIA Topic: Climate Change Risk	EIA Topic: Major Accidents and Disasters	How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
Mitigation Measures																				
WFDA-1	x	x		Minimum spacing of 1,150 m between floating offshore units (FOU) (centre to centre) to reduce possibility of secondary entanglement.			x	x	x										Secured in the s.36 Consent and Marine Licence via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval prior to commencement of construction.	Primary
WFDA-2	x	x	x	Minimum spacing of 1,150 m between FOUs (centre to centre) to avoid increasing the magnitude of impacts in localised areas, such as increased suspended sediment concentrations.	x	x	x												Secured in the s.36 Consent and Marine Licence via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval prior to commencement of construction.	Primary
WFDA-3	x	x	x	Minimum spacing of 1,150 m between FOUs (centre to centre) to reduce interaction between FSSs and to minimise potential changes to the local hydrodynamic regime. The adopted spacing will help to reduce the potential for interaction effects between individual FSSs and associated alterations to wave propagation and current patterns within and immediately surrounding the WFDA.	x														Secured in the s.36 Consent and Marine Licence via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval prior to commencement of construction.	Primary
WFDA-4	x			Where seabed preparation is required (e.g. seabed levelling), methods and equipment that have been designed to minimise the potential for sediment suspension and dispersal will be adopted as far as is reasonably practicable.	x	x	x	x	x	x									Secured in the s.36 Consent and Marine Licence via a condition requiring a CMS to be developed and submitted to the Scottish Ministers for approval prior to commencement of construction.	Primary
WFDA-5		x		Static sections of the IACs will be installed with a target burial depth of 0.5 to 2.5 m (if burial is required and where ground conditions allow), to avoid the need for external cable protection. External cable protection will only be used where adequate burial cannot be achieved and will be minimised so far as reasonably practicable, thereby limiting permanent benthic habitat disturbance and habitat loss. The requirement for, and extent of, any cable protection will be determined through a post-consent Cable Burial Risk Assessment (CBRA).	x	x	x			x									Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-6		X		Scour protection (e.g. concrete mattresses, rock placement, grout bags, artificial frond mats), will prevent scour during the operational life of the Bellrock Wind Farm Infrastructure, therefore inherently reducing risk of scour-induced temporary benthic habitat loss and disturbance and increased suspended sediment concentrations.	X	X	X												Secured in the s.36 Consent and Marine Licence via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-7		X		Where alternating current cable is used, armoured 3-phase single core (trefoil arrangement) high voltage submarine cables will be used, to minimise both electric and magnetic fields. Static sections of the IACs will be buried or protected, with a target burial depth of 0.5 to 2.5 m (if burial is required and where ground conditions allow), to reduce the impact of electromagnetic fields and thermal emissions, and to minimise disturbance. Cable trench width may also vary to accommodate greater burial depths (subject to the conclusions of a CBRA), further minimising disturbance to habitats and species.		X	X												Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-8	x			IAC burial techniques could involve ploughing, trenching or jetting reducing the magnitude of disturbance/temporary habitat loss for benthic receptors compared to other alternative techniques.	x	x	x												Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-9	x	x		Development of, and adherence to, a SOMP. The SOMP will set out any potential risks to legitimate sea users and identify measures to reduce these risks.						x	x		x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a SOMP to be developed and submitted to the Scottish Ministers for approval no later than three months after cable laying has been completed.	Tertiary
WFDA-10	x			Material displaced during cable burial activities will be backfilled, where necessary, to promote recovery of benthic habitats.	x	x	x												Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-11		x		Subsea infrastructure will be subject to routine monitoring to ensure marine growth remains within design tolerance. Localised cleaning will be undertaken when marine growth is likely to exceed or reach design tolerance. This approach limits the development and stability of extensive fouling		x	x												Secured in the s.36 Consent and Marine Licence, via a condition requiring a INNSMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
				communities and reduces the potential for INNS colonisation.															The deposit of marine growth is considered a licensable activity by MD-LOT. Therefore, the Applicant will apply for a marine growth deposit Marine Licence prior to any marine growth removal works taking place.	
WFDA-12	x			The PNMP will be submitted to MD-LOT for approval prior to the commencement of piling, outlining mitigation and management measures that will be implemented during pile installation.			x	x											Secured in the s.36 Consent and Marine Licence via a condition requiring a PNMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary
WFDA-13	x	x		For all FSS designs (semi-submersible platform and barge that move with the tide and tension leg platform FSS design, which is restrained by tensioned moorings and does not notably move with the tide), the air gap will be maintained relative to the sea surface and will be minimum 22 m above all tidal levels. This project design envelope will therefore encompass the minimum 22 m air gap above mean high water springs required by the MCA.					x	x	x							x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a CMS and DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-14	x	x	x	Development of and adherence to an IA-CaP. The IA-CaP will set out detailed IAC installation methods and techniques (based on final project design). The IA-CaP will confirm planned IAC routing, burial (if any), and any additional protection if required, and will set out methods for post-installation IAC monitoring.	x	x	x			x		x	x	x				x	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary
WFDA-15	x	x		A detailed CBRA will be prepared where IACs are proposed to be buried to determine the target burial depth. The burial depths may vary and will be dependent on risk and ground conditions. The CBRA will also highlight instances where adequate burial cannot be achieved, and alternative protection is needed.	x	x	x			x	x		x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-16	x	x		Any damage, destruction, or decay of cables will be notified to MCA, Northern Lighthouse Board (NLB), Kingfisher, and the United Kingdom Hydrographic Office.						x	x		x					x	Secured in the s.36 Consent and Marine Licence.	Tertiary
WFDA-17	x	x	x	Development of, and adherence to, a VMNSP. The VMNSP will describe measures put in place by the Applicant related to navigational safety, including information on Safety Zones, charting, construction						x	x		x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a Vessel Management Plan (VMP) and Navigational Safety Plan (NSP) to be developed and	Tertiary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
				buoyage, temporary lighting and marking, and means of notification of activity at the Bellrock WFDA to other sea users (e.g. via Notice to Mariners with Kingfisher Bulletins or other appropriate methods). Where appropriate, guard vessels will be used to ensure adherence with Safety Zones or advisory passing distances.															submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	
WFDA-18	x	x		A VMNSP will be developed and implemented for the construction and O&M phases of the Bellrock Wind Farm Infrastructure. The VMNSP will set out the types and anticipated numbers of vessels to be deployed, together with indicative transit corridors between the Bellrock WFDA and the relevant construction ports. The VMNSP will be aligned with the Scottish Marine Wildlife Watching Code (Scottish Natural Heritage, 2017a) and the associated Guide to Best Practice for Watching Marine Wildlife (Scottish Natural Heritage, 2017b). As such, vessel operations will incorporate recognised good practice measures to reduce the risk of disturbance to, and collision with, marine mammals, seabirds, and other marine megafauna. Where practicable, vessel movements will follow defined transit corridors, thereby concentrating activity within established navigation corridors and reducing the spatial extent of potential disturbance and collision risk. The number of vessel movements will be limited to those necessary for safe and efficient delivery of the works.			x	x	x											Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-19	x	x		Development of and adherence to a MPCP outlining the approach for managing and reducing risk of pollution and procedures to protect personnel and to be followed in the event of a pollution incident.	x	x	x	x	x	x	x		x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a MPCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **MPCP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-20	x	x		During the construction and O&M of the Wind Farm Infrastructure, periodic geophysical surveys would be required to ensure the IACs remain buried and if they do become exposed, remedial works will be undertaken.	x	x	x			x	x		x	x				x	Secured in the s.36 Consent and Marine Licence, via a condition requiring an IA-CaP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-21	x	x		An EMP will be prepared and implemented to set out the procedures to avoid, reduce, and manage potential environmental effects arising across the construction and O&M of the Bellrock Wind Farm Infrastructure, in accordance with relevant international and national legislation and guidance.	x	x	x	x	x	x	x		x	x			x	x	Secured in the s.36 Consent and Marine Licence via a condition requiring an EMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline EMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-22	x	x	x	Advance warning and accurate location details of construction, maintenance, and decommissioning activities, associated Safety Zones, and advisory passing distances will be given via notifications to mariners and Kingfisher Bulletins.						x	x		x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-23	x			Implementation of soft start and ramp-up measures for piling (which would reduce underwater noise effects), to be set out in the PNMP and part of the MMMP for piling activities. Each piling event would commence with a soft start at a lower hammer energy followed, by a gradual ramp-up for at least 20 minutes to the maximum hammer energy required. The soft start and ramp-up allows mobile species to move away from the area before the maximum hammer energy with the greatest noise impact area is reached.			x	x											Secured in the s.36 Consent and Marine Licence via a condition requiring an PNMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline MMMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Primary
WFDA-24	x	x		Development of, and adherence to, a MMMP. The MMMP for piling will be developed prior to commencement of construction and based upon best available information, methodologies, industry best			x	x											Secured in the s.36 Consent and Marine Licence via a condition requiring an PNMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
				practice, latest scientific understanding, current guidance and detailed project design. The MMMP for piling will be developed in consultation with MD-LOT and NatureScot, and will detail the proposed mitigation measures to reduce the risk of any physical or permanent auditory injury/change in hearing sensitivity (Permanent Threshold Shift (PTS)) to marine mammals and impacts of disturbance during all piling operations. This will include details of designed-in mitigation, for the soft-start and ramp-up, as well as details of the mitigation zone and any additional mitigation measures required in order to minimise potential impacts of any physical injury or PTS, for example, the activation of acoustic deterrent devices (ADD) for a maximum of 30 minutes[2] prior to the soft-start.														An **Outline MMMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	
WFDA-25	x			Development of, and adherence to, a PNMP. The PNMP will be developed in consultation with MD-LOT and NatureScot and prepared in accordance with the Marine Directorate guidance on mitigation and monitoring plans (Marine Directorate, 2025), which sets out prescriptive requirements for what the PNMP should cover.			x	x											Secured in the s.36 Consent and Marine Licence via a condition requiring a PNMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline MMMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-26	x			A detailed MMMP will be prepared for UXO clearance. The MMMP for UXO clearance will ensure there are adequate mitigation measures to minimise the risk of any physical or permanent auditory injury to marine mammals as a result of UXO clearance. The most suitable mitigation measures, based upon best available information and methodologies at that time will be utilised. The MMMP for UXO clearance will be prepared in consultation with MD-LOT and NatureScot. The MMMP for UXO clearance will include details of all the required mitigation measures to minimise the potential risk of PTS as a result of underwater noise during UXO clearance. This would consider the options, suitability and effectiveness of mitigation measures such as, but not limited to:			x	x	x	x											The Applicant will seek consent for UXO clearance activities via a separate Marine Licence application process. Secured in the UXO MMMP as part of a Marine Licence prior to construction. An **Outline MMMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
				▪ Avoidance of UXO if practicable; ▪ Use of low-order clearance techniques, such as deflagration; ▪ The potential use of noise abatement if any high-order detonation is required (taking into consideration the environmental limitations); ▪ Monitoring requirements for marine mammal observers; ▪ Requirements for ADDs; and ▪ Other UXO clearance techniques, or relocation of UXO. If more than one high-order detonation is required, other measures such as the use of scare charges; or multiple detonations, if UXO are located in close proximity, will also be considered.																	
WFDA-27	x			If required, mitigation for geophysical surveys will follow the Joint Nature Conservation Committee (2017) 'Guidelines for Minimising the Risk of Injury to Marine Mammals from Geophysical Surveys.			x	x											Secured through the EPS Risk Assessment and EPS Licence.	Tertiary
WFDA-28	x			Development of UXO Threat and Risk Assessment. All UXO detonations will be subject to a risk assessment undertaken in accordance with relevant guidance such as publication C754 Assessment and Management of UXO Risk in the Marine Environment (Construction Industry Research and Information Association, 2015).		x	x	x	x	x	x		x	x				x	A UXO Threat and Risk Assessment has been developed to support an indicative assessment of UXO clearance in the Bellrock WFDA EIA Report and will inform separate Marine Licence application(s) for UXO clearance.	Tertiary
WFDA-29	x	x		Development and implementation of a FMMCP. The FMMCP will describe the mitigation, monitoring, and communication measures to be implemented during the construction and O&M of the Bellrock Wind Farm Infrastructure to avoid or minimise adverse effects on commercial fisheries.						x									Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-30	x	x		Participation in a Regional Commercial Fisheries Working Group (subject to a Commercial Fisheries Working Group being established and operating effectively) to assist with liaison between the Applicant and the fishing community.						x					x				Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-31	x	x	x	Adherence to best practice guidance with regards to fisheries liaison and procedures in the event of interactions between the Wind Farm Infrastructure and fishing activities (e.g. Guidance on Claim for Compensation for Damage or Loss of Fishing Gear, Loss of Fishing Time, or Damage to Vessel by Suspected Offshore Renewable Activity (Scottish Government, 2021) and Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments, in particular Chapter 7 (FLOWW, 2025[3]), in particular Section 7 (Disruption Settlements, Protocols for Lost/Damaged Gear, and Fisheries Community Funds).						x									Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-32	x			Where boulder and/or unexploded ordnance removal is required during site preparation works or any phase of the WDFA, the location of unexploded ordnance and large boulders that are relocated and may pose a snagging risk for fishing gear, will be disclosed to the fishing industry within a timely manner and in an accessible format.						x	x							x	Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-33	x	x		Preparation of an INNSMP to include provisions for INNS management. The INNSMP would implement biosecurity measures in line with international and national regulations and guidance, namely: ▪ International Convention for the Prevention of Pollution from Ships (MARPOL), which sets out requirements, including appropriate vessel maintenance; ▪ The International Convention for the Control and Management of Ships' Ballast Water and Sediments, which provides an international framework for the control of transfer of potentially INNS from ballast water; and ▪ Consideration of guidance from the International Maritime Organisation (IMO, 2023) on the control and management of ships' biofouling to minimise the transfer of invasive aquatic species.		x	x	x		x								x	Secured in the s.36 Consent and Marine Licence via a condition requiring an INNSMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **INNSMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-34	x	x	x	Adherence to the following international and national regulations and guidance, namely: ▪ International Convention for the Prevention of Pollution from Ships (MARPOL), which sets out requirements, including appropriate vessel maintenance; ▪ The International Convention for the Control and Management of Ships' Ballast Water and Sediments, which provides an international framework for the control of transfer of potentially invasive species from ballast water; and ▪ Consideration of guidance from the International Maritime Organisation (IMO, 2023) on the control and management of ships' biofouling to minimise the transfer of invasive aquatic species.	x	x	x	x	x	x	x		x	x	x	x	x	x	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMNSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-35	x	x		Ongoing liaison with commercial fishing interests will be maintained throughout construction, O&M, and decommissioning of the Bellrock Wind Farm Infrastructure. A dedicated Fisheries Liaison Officer (FLO) will be appointed during the construction phase. During O&M and decommissioning, appropriate fisheries liaison arrangements will be maintained, including the appointment of a FLO, if required.						x	x								Secured in the s.36 Consent and Marine Licence via a condition requiring a FMMCP and a condition requiring the appointment of a FLO to be developed and submitted to the Scottish Ministers for approval before commencement of construction. The **FMMCP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-36	x	x	x	An application will be made post-consent for Safety Zones including: ▪ An application for Safety Zones for up to 500 m around each FOU[4] during its construction; ▪ An application for Safety Zones for up to 50 m around each FOU when construction works have been completed but prior to commissioning, or where construction works are partially completed and a construction vessel is not present; ▪ An application for Safety Zones for up to 500 m around each FOU during major maintenance during operation; ▪ An application (prior to commencement of decommissioning) for Safety Zones for up to 500 m around each FOU during its decommissioning; and ▪ Consideration will also be given to an application for up to 500 m operational Safety Zones throughout the O&M phase.						x	x		x						x	Safety Zones will be applied for under Section 95 of the Energy Act 2004 and the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007 before commencement of construction and where required, during construction and periods of major maintenance. Secured in the s.36 Consent and Marine Licence, via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Primary
WFDA-37	x	x	x	Where appropriate, guard vessels (or other suitable methods) will be used to ensure adherence with Safety Zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, O&M, and decommissioning phases.						x	x		x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-38	x	x	x	Development of and adherence to a DSLP. A DSLP will be developed post-consent to finalise the Bellrock WFDA layout in consultation with the MCA and NLB in accordance with s.36 and Marine Licence requirements. Specifically in relation to climate change risk, the assessment accounts for the technical requirements of the Wind Farm Infrastructure, design specifications and operational strategy which are built upon best practice engineering codes and standards in the offshore wind sector, and standard health and safety (H&S) procedures outlined in relevant management plans. Where likely significant effects are predicted, additional mitigation will be identified from available literature sources and in collaboration with the engineering team to ensure the Wind Farm Infrastructure is resilient to impacts arising from current extreme weather events and climatic conditions. Accounting for uncertainties in longer-term climate change projections and their implications for the Bellrock Wind Farm Infrastructure, adaptive management measures will also be reviewed in line with ISEP guidance (2020)[2] to ensure mitigation is implemented where and when appropriate. The DSLP will ensure that climate change resilience is built into the design from the outset to mitigate the risk of climate change impacts on the conditions and performance of the Wind Farm Infrastructure during the operational lifetime.						x	x		x				x	x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary
WFDA-39		x		All relevant Wind Farm Infrastructure[4] will be appropriately marked on all physical and electronic nautical charts as distributed by the United Kingdom Hydrographic Office.						x	x		x					x	Secured in the DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-40	x	x	x	Development of, and adherence to, an LMP. The LMP will confirm compliance with legal requirements with regards to shipping, navigation and aviation marking and lighting. Failures of the lighting and marking within the Bellrock WFDA will be appropriately reported and rectified as soon as practicable. Interim hazard warnings will be put in place as required.					x	x	x	x	x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a LMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline LMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-41	x	x	x	Any dropped objects during works associated with the Bellrock WFDA will be reported in line with MD-LOT's guidance on the 'accidental deposit of an object at sea' (Marine Directorate, 2024) and objects will be recovered where they pose a hazard to other marine users and where recovery is practicable.			x			x	x		x					x	Secured in the s.36 Consent and Marine Licence via a condition an EMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline EMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence Application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-42	x	x		Development of, and adherence to, an ERCoP. The ERCoP will detail protocols that will be undertaken in the event of an emergency, including occupational H&S, and set out clear roles and responsibilities, emergency contacts and reporting and escalation pathways. Protocols for extreme weather events will also be included. The ERCoP will mitigate the risk of climate change impacts on construction site personnel, plant and equipment and other assets and the risk of delays to the construction programme due to extreme weather events, which are becoming more frequent and intense due to climate change. The ERCoP will ensures the implementation of response protocols in the event of emergencies for offshore activities.						x	x	x	x				x	x	Submitted to the Scottish Ministers for approval via the VMNSP, which will address all the recommendations of the Maritime and Coastguard Agency (MCA) in Marine Guidance Note 654 (MCA, 2021). An **Outline VMNSP (Volume V**) is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-43		x		The Applicant will ensure compliance with the Regulatory Expectations on Moorings for Floating Wind and Marine Devices (MCA and Health and Safety Executive, 2017).				x		x	x		x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V**) is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-44	x	x		Marine coordination will be implemented to manage project vessels throughout construction, O&M, and decommissioning periods, including in liaison with relevant ports and harbours.						x	x		x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-45	x	x	x	Project vessels will ensure compliance with international marine regulations as adopted by the Flag State, including the Convention on the International Regulations for Preventing Collisions at Sea (COLREGs) and the International Convention for the Safety of Life at Sea (SOLAS), thereby reducing the risk of navigational incidents, including vessel collisions, and associated risks to other sea users and the marine environment.						x	x		x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP, to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-46	x	x		The Applicant will ensure compliance with Marine Guidance Note 654 and its annexes, where applicable, including the completion post-consent of an ERCoP and a search and rescue checklist in consultation with the MCA. The ERCoP will ensure the implementation of response protocols in the event of emergencies for offshore activities.					x	x	x	x	x				x	x	Submitted to the Scottish Ministers for approval via the VMNSP, which will address all the recommendations of the Maritime and Coastguard Agency (MCA) in Marine Guidance Note 654 (MCA, 2021). An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

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WFDA-47		x	x	Development of, and adherence to, a DP. The DP will set out the framework for the safe, orderly, and environmentally acceptable decommissioning and removal of the Bellrock Wind Farm Infrastructure, in the interests of safety and environmental protection. Climate change risk measures will be included in the DP to be developed prior to the commencement of construction and will include a review of site-specific weather and metocean conditions, recent extreme weather events and up-to-date climate change projection data will be undertaken to ensure risk assessments, H&S protocols and guidelines on safe working practices are suitable for future climate conditions at the time of decommissioning works. The DP will be refreshed prior to decommissioning activities commencing. The DP will mitigate the risk of climate change impacts on decommissioning site personnel, plant and equipment and other assets and the risk of delays to the decommissioning programme due to extreme weather events, which are becoming more frequent and intense due to climate change.	x	x	x	x	x	x	x	x	x	x	x	x	x	x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a DP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary
WFDA-48	x	x	x	A workforce mental health management plan will be implemented through the project-specific H&S plan. This will include site inductions, access to support services, and procedures to identify and manage fatigue and stress, thereby reducing potential adverse effects on workforce wellbeing.											x				Mental health management shall be captured in the project specific H&S plan, which will include reference to appointed mental health first aiders. The approved CMS will cross reference to relevant H&S documentation where such measures are detailed. Contracted parties may, depending on scope of works, be required to provide their business specific plans which refer to mental health.	Tertiary
WFDA-49	x	x		Appropriate marking of the Bellrock WFDA on aeronautical charts. This will include provision of the positions and heights of structures to Civil Aviation Authority, Ministry of Defence, and Defence Geographics Centre.								x	x					x	Secured in the s.36 Consent and Marine Licence, via a condition requiring a LMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary

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	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-50	x	x	x	No more than two non-rotating FOUs will be towed together at once and will not exceed a velocity of 10 knots.			x	x		x	x	x	x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a VMP and NSP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline VMNSP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Primary
WFDA-51	x	x	x	Lights, marks, sounds, signals, and other aids to navigation will be exhibited as required by NLB, MCA, and the Civil Aviation Authority including the buoyed construction/decommissioning areas.						x	x	x	x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a LMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline LMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-52	x	x	x	The layout of the WTGs[4] in the Bellrock WFDA, will be finalised in discussion with the MCA and NLB to ensure the specific layout is compatible with potential search and rescue activity.						x	x	x	x					x	Secured in the s.36 Consent and Marine Licence via a condition requiring a DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary
WFDA-53	x	x		Commitment to preparation and agreement on an Offshore WSI and PAD.										x					Secured in the s.36 Consent and Marine Licence via a condition requiring a WSI to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **WSI and PAD (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-54	x	x		The implementation of Archaeological Exclusion Zones (AEZs) around sites identified as having a known important archaeological potential to mitigate the potential impacts from offshore infrastructure.										x					Secured in the s.36 Consent and Marine Licence via a condition requiring a WSI to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **WSI and PAD (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-55	x	x		Archaeological input into specifications for and analysis of future geophysical surveys and/or geotechnical surveys within the Bellrock WFDA, including a provision for sampling, analysis and reporting of recovered cores, if appropriate. The results of all geoarchaeological investigations to be compiled in a final report which includes a sediment deposit model.										x					Secured in the s.36 Consent and Marine Licence via a condition requiring a WSI to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **WSI and PAD (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-56	x	x	x	Archaeologists to be consulted in the preparation of any Remotely Operated Vehicle or diver surveys and in monitoring/checking of data, if appropriate based upon the findings of the archaeological assessment of geophysical survey data.										x					Secured in the s.36 Consent and Marine Licence via a condition requiring a WSI to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **WSI and PAD (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary
WFDA-57	x			All anomalies of possible archaeological potential will be reviewed against the final layout and design. If they are likely to be impacted, these anomalies would undergo further archaeological investigation. Should these anomalies prove to be of archaeological importance then future AEZs may be implemented following consultation with heritage stakeholders.										x					Secured in the s.36 Consent and Marine Licence via a condition requiring a WSI to be developed and submitted to the Scottish Ministers for approval before commencement of construction. A **WSI and PAD (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-58	x			Micro-siting of station keeping stations, IACs and subsea cable hub(s) to avoid known heritage assets (AEZs) where practicable.										x					Secured in the s.36 Consent and Marine Licence via a condition requiring a CMS and DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary
WFDA-59	x			Seabed contacting infrastructure will be micro-sited, where practicable, to avoid sensitive seabed habitats, low or limited mobility benthic species, such as Annex I habitats and Priority Marine Features. Micro-siting will be informed by surveys prior to the commencement of construction which will identify the location and extent of habitats and species.		x	x	x	x							x			Secured in the s.36 Consent and Marine Licence via a condition requiring a CMS and DSLP to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Primary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-60	x			Development of, and adherence to, a CMS. The CMS will describe the methods for construction for all consented Wind Farm Infrastructure and set out the measures to be implemented to avoid or reduce adverse effects on the environment and legitimate users of the sea during the construction phase. This will include a clear definition of roles and responsibilities and reference to relevant H&S protocols. In relation to climate change, the CMS will incorporate measures to ensure construction activities are resilient to current and projected extreme weather and metocean conditions. This will include, as appropriate: ▪ Monitoring of site-specific weather and metocean conditions, including use of recognised forecasting and severe weather alert services; ▪ Programming and phasing of construction activities with regard to seasonality and short- to medium-term forecasts; ▪ Definition of safe working limits for vessel, lifting, and installation operations and procedures for suspension of works where thresholds are exceeded; ▪ Measures to secure plant, equipment, and materials during adverse weather; and ▪ Risk assessments and safety procedures that account for site-specific extreme weather risks. Through these measures, the CMS will mitigate risks to construction personnel, plant, and equipment, and reduce the potential for programme disruptions arising from extreme weather events.	x	x	x	x	x	x	x	x	x	x	x	x	x	x	Secured in the s.36 Consent and Marine Licence via a condition requiring a CMS to be developed and submitted to the Scottish Ministers for approval before commencement of construction.	Tertiary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-61		x		Regular and periodic inspections and maintenance of all components of the Wind Farm Infrastructure will be undertaken over their operational lifetime to identify and remediate any damage and deterioration and maintain good working conditions. These will be included in the OMP. Monitoring of site-specific weather and metocean conditions, recent extreme weather events and up-to-date climate change projection data will be undertaken to provide a dynamic risk assessment of climate change impacts and inform operation and maintenance planning. The OMP will mitigate the risks of climate change impacts on the conditions and performance of the Wind Farm Infrastructure and ensures that it is adaptable to future climate conditions and remains resilient over its operational life. The O&M strategy will be adaptive, with the frequency of maintenance, repair and replacement activities being adjusted based on need (i.e. increasing planned O&M visits for components with higher deterioration rates than anticipated).	x	x	x	x	x	x	x	x	x	x	x	x	x	x	Secured in the s.36 Consent and Marine Licence via a condition requiring an OMP to be developed and submitted to the Scottish Ministers for approval prior to the commissioning of the first WTG.	Tertiary
WFDA-62		x		Regular and periodic inspections and maintenance of the Wind Farm Infrastructure will be undertaken over its operational life to identify and remediate any damage and deterioration and maintain good working conditions (including any debris entangled with the Wind Farm Infrastructure). This will include but not be limited to surveys of subsea infrastructure.			x	x	x	x								x	Secured in the s.36 Consent and Marine Licence via a condition requiring an OMP to be developed and submitted to the Scottish Ministers for approval prior to the commissioning of the first WTG.	Primary
WFDA-63	x	x		Should any sulphur hexafluoride (SF_6) containing equipment be required, a gas leakage monitoring and detection system will be implemented to minimise operational leakages. In the rare event of a leakage occurring, the fault will be repaired as soon as reasonably practicable. The Applicant will consider SF_6-free electrical equipment during detailed design and procurement where alternatives are deemed suitable.												x			Secured in the s.36 Consent and Marine Licence via a condition requiring an OMP to be developed and submitted to the Scottish Ministers for approval prior to the commissioning of the first WTG.	Primary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-64	x	x	x	The Applicant will implement an Environmental Management System adhering to International Standards Organisation 14001:2015 (International Standards Organisation, 2015), which includes a requirement for the reduction of greenhouse gas emissions. The implementation of the Environmental Management System will support the Bellrock Project to systematically identify, manage and reduce its greenhouse gas emissions.												x			Secured in the s.36 Consent and Marine Licence via a condition requiring an EMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline EMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Primary
WFDA-65	x	x	x	Proactively engage with potential suppliers to build local supply chain capacity. Work with other developers, the Scottish Government, and key stakeholders to assist in addressing barriers to local supply chain participation, with the aim of supporting and enhancing the participation of local businesses. Alongside this, the Energy Pathfinder[5] (or similar initiative) will be utilised to ensure visibility of relevant opportunities for Scottish and UK suppliers to bid for work. This measure will ensure opportunities for supply chain spending in Scotland and the UK are maximised.											x				Secured in the s.36 Consent and Marine Licence at the Scottish Ministers discretion.	Tertiary
WFDA-66	x	x	x	Collaborate with local and national agencies on enterprise and skills development programmes to train and upskill the workforce and ensure local residents have access to the opportunities created.											x				Secured in the s.36 Consent and Marine Licence at the Scottish Ministers discretion.	Tertiary
WFDA-67	x	x	x	Develop and implement a Stakeholder Engagement Plan to facilitate ongoing engagement with the local authority, local community, and other relevant stakeholders once assembly and integration port(s) have been identified. The Stakeholder Engagement Plan will provide a framework for the timely dissemination of information on proposed activities, and enable collaborative management of potential effects on local receptors, including traffic, port use, and local amenities.											x				Secured in the s.36 Consent and Marine Licence at the Scottish Ministers discretion.	Secondary

Measure ID	Project Phase			Mitigation and Monitoring Measure	EIA Topic														How the Measure is Secured	Mitigation Type (Primary, Secondary or Tertiary[1])
	Construction	Operation and Maintenance	Decommissioning		Marine Geology, Oceanography and Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Marine Infrastructure and Other Users	Marine Archaeology and Cultural Heritage	Socioeconomics, Tourism and Recreation	Greenhouse Gas Assessment	Climate Change Risk	Major Accidents and Disasters		
WFDA-68		x		NATS has confirmed Perwinnes will not have Radar Line of Sight (RLoS) of WTGs within the Bellrock WFDA. As part of the detailed design of the Wind Farm Infrastructure undertaken post consent, should the RLoS impact on Remote Radar Head (RRH) Buchan require mitigation, the Applicant would not position WTGs with an equivalent tip height of 320 m above Mean Sea Level within the RRH Buchan RLoS. In the event that Defence Infrastructure Organisation consider that a materially larger area of the Bellrock WFDA presents RLoS impact on RRH Buchan, the Applicant will consider mitigating the impact through new Air Defence infrastructure procured under Programme NJORD, with the cost of such Programme NJORD deployment being borne by the UK Government.								x								Secured in the s.36 Consent via a condition requiring an obstacle free area (if required) for WTGs with an equivalent blade tip height of 320 m above Mean Sea Level.	Secondary
WFDA-69	x	x	x	Lighting as specified in the LMP will adhere to navigation and aviation legal requirements but will be minimised as far as possible beyond that to reduce potential effects to sensitive seabirds.					x										Secured in the s.36 Consent and Marine Licence, via a condition requiring a LMP to be developed and submitted to the Scottish Ministers for approval before commencement of construction. An **Outline LMP (Volume V)** is submitted alongside the s.36 Consent application and Marine Licence application for the Bellrock Wind Farm Infrastructure.	Tertiary

Notes:

[1] Primary and Tertiary are embedded mitigation which is inherent to the Bellrock WFDA; Secondary is additional mitigation identified as a result of the significance of effects assessment.

[2] Anything additional to 30-minutes ADD activation is considered secondary mitigation and therefore not a designed in measure.

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

[4] The embedded mitigation measures identified within the Navigational Risk Assessment have been developed with respect to the Bellrock Wind Farm Infrastructure and surface piercing Bellrock Offshore Transmission Infrastructure located within the Bellrock WFDA. Accordingly, the offshore substations, part of the Offshore Transmission Infrastructure, were considered within the Navigational Risk Assessment in relation to navigational hazards including vessel allision risk and emergency response access, on the basis that the assessed Bellrock WFDA layout encapsulates such infrastructure. However, the offshore substations do not form part of the Bellrock Wind Farm Infrastructure s.36 Consent and Marine Licence applications and will be consented separately under the Bellrock Offshore Transmission Infrastructure Marine Licence application. Mitigation and monitoring measures relevant to the offshore substations are therefore not included within this register and will be secured through the Bellrock Offshore Transmission Infrastructure consenting process.

[5] Energy Pathfinder (https://energypathfinder.nstauthority.co.uk/projects) is a searchable database of upcoming construction and O&M contracts for North Sea oil and gas and renewable energy projects.

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