Bellrock Offshore Wind Farm

Wind Farm Development Area

Volume V

Written Scheme of Investigations and Protocol for Archaeological Discoveries

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

Term	Definition
Dynamic inter-array cable	The section of inter-array cable between the floating substructure and the seabed, which is designed to accommodate the dynamic movement of the floating substructure.
Excursion limit	The maximum horizontal movement of a floating substructure from its design coordinates.
Fixed bottom substructure	A substructure that provides support for the offshore substation or offshore reactive compensation station by transferring loads to the seabed, and provides a conduit for interconnector cables and/or offshore export cables.
Floating offshore unit	The combined wind turbine generator and floating substructure.
Floating substructure	A floating structure which provides buoyancy and, in conjunction with the station keeping system, supports a superstructure (e.g. wind turbine generator or offshore substation), and maintaining its position within the structure's excursion limit.
Geoarchaeology	The application of earth science principles and techniques to the understanding of the archaeological record. Includes the study of soils and sediments and of natural physical processes that affect archaeological sites such as geomorphology, the formation of sites through geological processes and the effects on buried sites and artefacts.
Glacial/Interglacial	A glacial period is a period of time within an ice age that is marked by colder temperatures and glacier advances. Interglacial correspond to periods of warmer climate between glacial periods. There are three main periods of glaciation within the last 1 million years, the Elsterian, the Saalian and the Weichselian which ended about 12,000 years ago. The Holocene period corresponds to the current interglacial.
Inter-array cable	Armoured cable containing electrical and fibre optic cores, which link the wind turbine generators to each other and to the subsea cable hubs and/or the offshore substations and include dynamic inter-array cable and static inter-array cable sections.
Interconnector cable	Armoured cable containing electrical and fibre optic cores which link two or more offshore substations.
Marine isotope stage	Marine isotope stages are alternating warm and cool periods in the Earth's paleoclimate, deduced from oxygen isotope data reflecting changes in temperature derived from data from deep sea core samples.
Mean High Water Springs	The average over a year of the heights of two successive high waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
Nanotesla	A unit of measurement of a magnetic field, equal to one billionth of a tesla.
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.

Term	Definition
Offshore Development Area	The area comprising: ▪ The Wind Farm Development Area; and ▪ The Offshore Transmission 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, O&M, and decommissioning).
Operational life	The expected operational life of the Bellrock Wind Farm Development Area from the Commercial Operation Date to the first Floating Offshore Unit being decommissioned.
Palaeoenvironmental analysis	The study of sediments and the organic remains of plants and animals to reconstruct the environment of a past geological age.
Palaeogeographic feature	Features seen within sub-bottom profiler data (buried) and multibeam bathymetry data (sea floor) interpreted as representing prehistoric physical landscape features such as former river channels (palaeochannels).
ScotWind	A Crown Estate Scotland leasing round for offshore wind projects in which the process enabled developers to apply for seabed rights to plan and build wind farms in Scottish waters.
Scour protection	Protective material positioned around anchors and substructures to avoid sediment being eroded as a result of the flow of water.
Seabed features	Features seen on the seafloor in the sidescan sonar or multibeam bathymetry data which are interpreted to represent heritage assets, or potential heritage assets. Also includes magnetic anomalies which may represent shallow buried ferrous material of archaeological interest
Seabed prehistory	Archaeological remains on the seabed corresponding to the activities of prehistoric populations that may have inhabited what is now the seabed when sea levels were lower.
Site preparation works *(in an offshore context)*	Preparatory activities undertaken within the Wind Farm Development Area prior to the commencement of construction of the Wind Farm Development Area, which may comprise (and which may require separate consents): ▪ Geophysical surveys, geotechnical surveys, and non-archaeological/archaeological diver/remotely operated vehicle surveys; ▪ Seabed preparation including sand wave levelling and boulder clearance; ▪ Unexploded ordnance survey and/or clearance; ▪ Debris clearance; and ▪ Out of service cable/pipeline removal.

Term	Definition
Station keeping system	The system (including mooring lines and anchors) used to hold a floating offshore unit within its excursion limit and maintain the intended orientation of the floating offshore unit.
Subsea cable hub	A subsea device, with a gravel pad foundation, which allows the connection of multiple inter-array cables.
Towing	Transportation of a floating offshore unit or floating substructure between a port, and/or wet storage facility and/or the Wind Farm Development Area.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure was constructed, operated and decommissioned.
Wind Farm Infrastructure	Infrastructure located within the Wind Farm Development Area including wind turbine generators; floating substructures, station keeping systems and associated scour protection; inter-array cables and associated cable protection; subsea cable hubs; and ancillary infrastructure including buoys (including activities associated with the Wind Farm Infrastructure construction, operation and maintenance, and decommissioning).
Wind turbine generator	A wind turbine generator converts wind energy into electrical energy. The main components include rotor assembly (composed of three blades and a hub); nacelle (containing the generator, shaft and gearbox, power electronic converter and transformer); and a tower (containing lifting equipment and switchgear).
Written Scheme of Investigation	Specific document forming the agreement between the Applicant, the appointed archaeologists, contractors and the relevant stakeholders seaward of Mean High Water Springs. The document sets out the methods to mitigate the effects on all the known and potential archaeological receptors within the Wind Farm Development Area.

Glossary of Abbreviations

Term	Definition
AEZs	Archaeological exclusion zones
CES	Crown Estate Scotland
CIfA	Chartered Institute for Archaeologists
CMS	Construction Method Statement
DP	Decommissioning Plan
EIA	Environmental impact assessment
EMP	Environmental Management Plan
GIS	Geographic information system
GW	Gigawatts
HES	Historic Environment Scotland
IAC	Inter-array cable
IA-CaP	Inter Array Cable Plan
km	Kilometres
MBES	Multibeam echosounder
MD-LOT	Marine Directorate – Licensing Operations Team
MOD	Ministry of Defence
nT	nano-Tesla
O&M	Operation and Maintenance
OfTDA	Offshore Transmission Development Area
OMP	Operation Management Plan
PAD	Protocol for Archaeological Discoveries
ROV	Remotely operated vehicle
RoW	Receiver of Wreck
SBP	Sub-bottom profiler
ScARF	Scottish Archaeological Research Framework
SSEN	Scottish and Southern Electricity Networks
SSS	Side scan sonar

Term	Definition
SSS	Side Scan Sonar
TEZ	Temporary exclusion zone
UKHO	UK Hydrographic Office
UXO	Unexploded ordnance
WFDA	Wind Farm Development Area
WSI	Written Scheme of Investigation

1 Introduction

1.1 Background

1. In January 2022, as part of the ScotWind leasing round managed by Crown Estate Scotland (CES), Bellrock Offshore Wind Farm (the Applicant[1]) was successfully awarded development rights for an area of seabed to develop the Bellrock Wind Farm Development Area (WFDA), which forms part of the Bellrock Offshore Wind Farm (the Bellrock Project).

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

   - The Bellrock WFDA within which the Bellrock Wind Farm Infrastructure was constructed, operated and maintained, and decommissioned; and
   - The Bellrock Offshore Transmission Development Area within which the Bellrock Offshore Transmission Infrastructure was constructed, operated and maintained, and decommissioned.

3. The Bellrock WFDA is located 120 km from Stonehaven (116 km from Peterhead), in Aberdeenshire, Scotland, and covers an area of 280 km^2. The Bellrock Wind Farm Infrastructure located within the Bellrock WFDA comprises wind turbine generators and associated floating substructures and station keeping systems, inter-array cables (IAC), subsea cable hub(s), cable protection and scour protection; and ancillary infrastructure including buoys.

4. This Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) relates to the Bellrock WFDA only. It accompanies the Environmental Impact Assessment (EIA) Report to be submitted alongside applications for Section 36 Consent (under the Electricity Act 1989) and Marine Licence(s) under the Marine and Coastal Access Act 2009 to Scottish Ministers, via Marine Directorate – Licensing Operations Team (MD-LOT) for the Bellrock WFDA.

1.2 Purpose of Document

5. This WSI and PAD has been prepared by Haskoning on behalf of the Applicant and describes the measures that will be put in place to avoid or minimise the adverse effects of the construction, operation and maintenance (O&M), and decommissioning of Bellrock Wind Farm Infrastructure located within the Bellrock WFDA on marine archaeology and historic environment. A separate WSI and PAD will be prepared to support the Bellrock Offshore Transmission Development Area application.

[1] The term 'Applicant' and 'Developer' are used within this plan to reflect the pre-consent and post consent development phases of the Bellrock WFDA.

6. The overall objective of the WSI is to provide the overarching framework for the delivery of archaeological investigation and mitigation prior to, and during, the construction, O&M and decommissioning of the Bellrock Wind Farm Infrastructure. The PAD sets out what the Applicant must do on discovering any marine archaeology during the construction, O&M and decommissioning of the Bellrock Wind Farm Infrastructure.

7. Where decommissioning requires a separate Marine Licence, all information required for the decommissioning activities was submitted at the time of the decommissioning application.

8. The WSI and PAD have been prepared in line with current best practice guidance (as set out in **Section 1.4**) to ensure that those involved in the construction, O&M and decommissioning of the Bellrock Wind Farm Infrastructure, including the Applicant, their personnel and agents, and all of the associated contractors, are aware of and understand archaeological mitigation measures, and how and when to apply them.

9. Specifically, this WSI and PAD has been prepared in accordance with 'Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects' (The Crown Estate, 2021). As stated in The Crown Estate guidance, a WSI forms an umbrella document, for all survey, investigation and assessment required for a project, supported by activity-specific method statements. A WSI:

   - Sets out the roles and respective responsibilities of the project team, contractors, and retained archaeologist and archaeological contractor(s) and formal lines of communication between the parties and with the heritage stakeholders and regulators (**Section 3**);
   - Outlines the known and potential archaeological receptors that could be impacted by the Bellrock Wind Farm Infrastructure (**Section 2**);
   - Outlines the agreed mitigation and archaeological actions that are to take place in various circumstances (**Section 5** and **6**);
   - Sets out the importance of research frameworks in setting objectives that are delivered through realisation of the work (**Section 1.4**); and
   - Provides summarised details of methodologies for these archaeological actions (**Section 5** to **Section 9**), which was clarified in more detail in subsequent activity-specific method statements (**Sections 10.1**).

10. This WSI and PAD also takes full account of the MD-LOT 'Mitigation and Monitoring Plans' guidance (MD-LOT, 2025).

1.3 Study Area

11. The study area for marine archaeology and cultural heritage corresponds to the pre-defined boundary for marine geophysical survey which includes the Bellrock WFDA plus a 1 km buffer (see **Figure A.1 (Appendix A**). This study area covers the full extent of the archaeologically assessed survey data and incorporates the area within which development activities could occur and, consequently, the area of potential impacts to marine archaeology and cultural heritage.

1.4 Approach to Written Scheme of Investigation

12. The following mitigation measures have been embedded in the design and layout of the Bellrock WFDA, as set out in the Bellrock WFDA EIA Report:

- Commitment to preparation and agreement on an Offshore WSI and PAD;
- 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;
- 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;
- 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;
- 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;
- Micro-siting of station keeping stations, IAC and subsea cable hub(s) to avoid known heritage assets AEZs where practicable;
- During the construction and O&M of the Wind Farm Infrastructure, periodic geophysical surveys would be required to ensure the IAC remain buried and if they do become exposed, remedial works will be undertaken;
- An Environmental Management Plan (EMO) 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;
- Development of Unexploded Ordnance (UXO) Threat and Risk Assessment;
- 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.

- Development of, and adherence to, a Construction Method Statement (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;
- 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 Operational Management Plan (OMP);
- Development of and adherence to an Inter Array Cable Plan (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; and
- Development of, and adherence to, a Decommissioning Plan (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.

13. It should be noted that while mitigation measures are secured through a WSI, it is the implementation of the procedures detailed within in it which discharge conditions/requirement, rather than its production. As such, it is anticipated that the archaeological works detailed in this document was delivered through a phased approach as follows:

- Pre-consent: desk-based and marine geophysical assessments undertaken to date (**Section 2.1**) including preliminary identification of AEZs (**Section 6.1**);
- **Post-application/pre-commencement**: acquisition of further geotechnical data and progression of geoarchaeological assessment (if required) (**Section 5.2**);
- Pre-construction:
  - Archaeological assessment of high resolution marine geophysical data (including unexploded ordnance (UXO) specification magnetometer data) acquired from refined layouts (**Section 5.1**);
  - Acquisition of further geotechnical data (if required) and progression/completion of geoarchaeological/palaeolandscape assessment (**Section 5.2**);
  - Archaeological investigation of selected anomalies as part of planned UXO investigation and clearance (**Sections 5.3** and **5.4**);
  - Implementation, monitoring and modification of AEZs (Section 6.1);
  - Micro-siting of the design to avoid AEZs and any other anomalies of possible archaeological interest (where possible) or further mitigation where avoidance is not possible (**Section 6.2**);
  - Operation of PAD during seabed preparation (e.g. boulder clearance, pre-lay grapnel run) (**Section 6.3**); and
  - Watching briefs (if required) during seabed preparation in high potential areas (**Section 5.4**).

- Construction:
  - Watching briefs (if required) during construction activities in high potential areas (**Section 5.4**); and
  - Operation of PAD during construction phase (**Section 6.3**).
- Post-construction:
  - Archaeological assessment of post-construction geophysical data to monitor construction and post-construction effects on marine archaeology and cultural heritage (**Section 7**).

14. Archaeological requirements relating to the operations and maintenance and decommissioning phases would be determined based on the outcomes of this phased approach (**Section 8**). As such, this WSI and PAD was updated, if required, throughout the operational life of the Bellrock WFDA e.g. as may be required for any adaptive management measures.

15. Post-consent detailed archaeological method statements was produced prior to survey or construction work, to provide a detailed methodology for each package of development or survey works, as required. Each method statement was consistent with this WSI, applicable guidance namely the recommended methodologies set out in The Crown Estate (2021) guidance.

16. Survey and work package specific archaeological objectives was established on a case-by-case basis with reference to all relevant project datasets (and associated archaeological and geoarchaeological interpretations) and to other relevant research and investigations with specific reference to established research agendas, including (but not limited to):

- Scottish Archaeological Research Framework (ScARF, 2012a);
- Scotland's Archaeology Strategy (Scotland Archaeology Strategy Committee, 2015); and
- Marine and Maritime Research Framework (ScARF, 2012b).

17. The objectives for each work package was set out in the relevant method statement and was agreed with heritage stakeholders prior to works commencing.

18. In demonstrating adherence to industry good practice, this WSI also draws upon available archaeological guidance for offshore development including:

- Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects (The Crown Estate, 2021);
- Protocol for Archaeological Discoveries: Offshore Renewables Projects (The Crown Estate, 2014);
- Chartered Institute for Archaeologists (CifA) Code of Practice and Standards and Guidance (CifA 2020a), (CifA 2020b), (CifA 2020c), (CifA 2022);
- Offshore Geotechnical Investigations and Historic Environment Analysis: Guidance for the Renewable Energy Sector (Gribble and Leather, 2011);

- Historic Environment Guidance for the Offshore Renewable Energy Sector Guidance (Wessex Archaeology, 2007); and
- Code of Practice for Seabed Development (Joint Nautical Archaeology Policy Committee (Joint Nautical Archaeology Policy Committee), 2006).

2 Baseline Summary

2.1 Summary of Assessment to Date

19. The existing environment for marine archaeology and cultural heritage is presented in **Chapter 15: Marine Archaeology and Cultural Heritage (Volume II)** of the Bellrock WFDA EIA Report. This was informed by the archaeological assessment of site-specific survey data acquired for the Bellrock WFDA by MSDS Marine (**Appendix 15.1: Archaeological Assessment of Geophysical and Hydrographic Data (Volume IV)**).

20. The geophysical and hydrographic survey was conducted by TerraSond Limited (TerraSond, 2023) between 24 June 2023 and 12 August 2023, and consisted of side scan sonar (SSS), multi-beam echosounder (MBES), magnetometer, parametric sub-bottom profiler (SBP), and Sparker. In addition, the survey campaign included the collection of environmental data.

21. Survey operations were undertaken within a pre-defined boundary of the Bellrock WFDA of 280 km^2, plus a 1 km buffer. The survey was planned with a line spacing of 140 m for the main lines, and 1,000 m for the cross lines. The line spacing ensured 100% coverage of MBES data (with a minimum of 10% overlap) and 200% coverage of SSS.

22. The data were collected to a specification appropriate to achieve the following interpretation requirements:

- Sidescan Sonar: ensonification of anomalies > 0.5 m;
- Multibeam Bathymetry: ensonification of anomalies > 1.0 m;
- Magnetometer: 5 nT threshold for anomaly picking;
- Parametric Sub-bottom Profiler: penetration > 5 m was achieved; and
- Sparker: penetration > 20 m was achieved.

23. The data were generally of good quality, with minimal interference or data degradation caused by environmental factors or the simultaneous use of different sensors. The magnetometer survey line spacing of 150 m was too great for the accurate positioning of small magnetic anomalies but was sufficient to be correlated with features visible on the seabed. Even at a wide line spacing the magnetometer data can indicate areas of archaeological potential.

24. Geotechnical surveys of the WFDA were conducted between the 22 September and the 6 November 2023 (Acteon Geo Services, 2024). The scope of work consisted of 20 cone penetration test locations from mudline to a target depth of 20 m below mud line with 20 adjacent sampling locations from mudline to a target depth of 6 m below mud line.

2.2 Seabed Prehistory

25. There are no known seabed prehistory sites within the Bellrock WFDA.

26. The archaeological assessment of SBP data, the ground model (OWC, 2024), and a review of desk-based sources was undertaken by MSDS Marine, to determine the likely chronostratigraphy within the Bellrock WFDA.

27. The geometry and distribution of the units is closely linked with a series of buried channels. Four principal channels were identified in the initial interpretation report (OWC, 2024) as (from west to east) channels A, B, C and D. A fifth channel was interpreted as more widespread in the ground model and identified in the archaeological assessment as channel E. Channel locations are illustrated on **Figure 28** to **Figure 34** of **Appendix 15.1: Archaeological Assessment of Geophysical and Hydrographic Data (Volume IV)** in the Bellrock WFDA EIA Report. These channels are potentially associated with the group of features known as 'Devils Hole'.

28. A summary of eight geological units identified within the study area, and their archaeological potential, is provided in **Table 2.1**. Overall, these units have a very low to low archaeological potential, while units D1 and D3 have a low to moderate potential for palaeoenvironmental remains.

Table 2.1: Summary of Identified Units and Horizons

Unit	Horizon		Depth to Base (m Below Seafloor)	Seismic Character	Expected/ Demonstrated Lithology	Depositional Environment	Correlated Formation /Member	MIS (Marine Isotope Stage)	Age	Potential	
	Top	Base								Prehistoric Archaeology	Paleo-environmental
A1	H000 (Seabed)	H010/C4 (partly)	<10.2	Unit: low amplitude unit, generally structureless. Sometimes more layered reflectors observed in lenses. Best observed in SBP data. At channel bases discontinuous reflections become stronger, with low to moderate amplitudes and some onlap to channel margins. Upper horizon (seabed): positive, high-amplitude acoustic reflector with sharp underlying trough. Basal horizon: positive, low amplitude acoustic reflector. Often forms an undulating, smooth surface. Downward dip in channel areas following channel profiles. Irregular, undulating surface beneath seafloor topographic highs.	Loose, silty fine sand, slightly gravelly with frequent shell fragments.	Marine	Seabed sediments	1	Holocene	Very low	Negligible

Unit	Horizon		Depth to Base (m Below Seafloor)	Seismic Character	Expected/ Demonstrated Lithology	Depositional Environment	Correlated Formation /Member	MIS (Marine Isotope Stage)	Age	Potential	
	Top	Base								Prehistoric Archaeology	Paleo-environmental
A2	H010	H020/C1	<56.5	Unit: low amplitude unit, structureless and layered in appearance. Layering typically observed in channels and has continuous reflectors. Variable transparent to weak reflectors, transitioning to strong parallel (sometimes horizontal) to discontinuous and hummocky/contorted reflectors. General lack of organisation. Chaotic to complex fill, onlap and divergent. Basal horizon: Positive, moderate amplitude acoustic reflector with sharp overlying and underlying trough. Often forms an erosive surface that can be irregular. Major unconformity marks channel base. Cuts through most horizons mapped beneath. Topography potentially outcrops this horizon at, or very close to, the present seafloor.	Medium to very dense, fine- to medium grained silty sand, with rare shell fragments.	Shallow marine	Whitehorn Member, Forth Formation	1	Holocene	Very low	Negligible

Unit	Horizon		Depth to Base (m Below Seafloor)	Seismic Character	Expected/ Demonstrated Lithology	Depositional Environment	Correlated Formation /Member	MIS (Marine Isotope Stage)	Age	Potential	
	Top	Base								Prehistoric Archaeology	Paleo-environmental
B	H020	H030/P2	<54.3	Unit: moderate-high amplitude unit, often with well-layered appearance and continuous reflectors. Can also appear more structureless. Basal horizon: positive, low-moderate amplitude acoustic reflection, often unclear and marked by change from layered to chaotic texture. Forms an erosive surface.	Extremely low to medium strength clay and silty clay, possibly interlaminated with slightly clayey, fine-grained sand.	Low energy marine; lagoonal or marginal marine.	Fitzroy Member, Forth Formation	2 to 1	Pleistocene - Holocene	Very low	Low
C	H030/P2	H040	<26.1	Unit: moderate-low amplitude unit, typically structureless with discontinuous reflectors. Subtle layering can be observed in association with moderate amplitudes. Internal reflections weaker near incisions. Basal horizon: positive, moderate-high amplitude acoustic reflector, sometimes overlying and underlying sharp troughs. Mostly planar surface. Characterised by major	Dense to very dense, silty, fine-grained sand, possibly with occasional cobbles.	Shallow glaciomarine inner shelf to estuarine.	Marr Bank Formation	2	Pleistocene	Very low	Very low

Unit	Horizon		Depth to Base (m Below Seafloor)	Seismic Character	Expected/ Demonstrated Lithology	Depositional Environment	Correlated Formation /Member	MIS (Marine Isotope Stage)	Age	Potential	
	Top	Base								Prehistoric Archaeology	Paleo-environmental
				unconformity, marked by discontinuous strong events with wavy appearance of doublet. Generally, dips to west.							
D1	H040	H050	<81.4	Unit: low-moderate amplitude unit, chaotic or structureless in appearance. Reflectors discontinuous where present, stronger at base of channels. Some stronger and conformable reflectors suggest internal stratification. Basal horizon: often lacks sharp boundary, instead marked by a cluster of moderate negative and positive amplitudes. Forms an irregular and erosive surface.	Medium density, very high strength interlaminated clay and silty, fine-grained sand, with occasional black, organic staining.	Intertidal	Coal Pit Formation (channels)	5d to 3	Pleistocene	Very low	Moderate
D2	H050	H060	<37.6	Unit: low-moderate amplitude unit, can exhibit bands of subtle layering and chaotic texture. Layered reflectors are semi-continuous. Reflections are conformable to base,	Very dense clayey silt to silty clay and clean to silty sand.	Glaciomarine; possibly intertidal or glaciolacustrine	Coal Pit Formation (upper facies)	6 to 3	Pleistocene	Very low	Low

Unit	Horizon		Depth to Base (m Below Seafloor)	Seismic Character	Expected/ Demonstrated Lithology	Depositional Environment	Correlated Formation /Member	MIS (Marine Isotope Stage)	Age	Potential	
	Top	Base								Prehistoric Archaeology	Paleo-environmental
				suggesting stratification. Dipping to northwest. Basal horizon: positive, low amplitude acoustic reflectors, sometimes with diffuse overlying trough. Often appearing as a faint reflection, difficult to discern							
D3	H060	H070/P1	<57.8	Unit: low-moderate amplitude unit, structureless and mostly chaotic texture. Defined more in west by parallel, continuous reflections, indicating bedding. In east, transitions to less continuous reflections. Basal horizon: positive, low amplitude acoustic reflection, often with diffuse overlying and underlying troughs. In part forms an erosive and irregular surface. Base defined by a weak truncation event, minor topography of wavy character, generally dipping to west.	Dense to very dense, high to very high strength sandy/silty clay and interlaminated clay and fine-grained silty sand.	Glaciomarine; possibly intertidal or glaciolacustrine	Coal Pit Formation (lower facies)	6 to 3	Pleistocene	Very low	Low to moderate

Unit	Horizon		Depth to Base (m Below Seafloor)	Seismic Character	Expected/ Demonstrated Lithology	Depositional Environment	Correlated Formation /Member	MIS (Marine Isotope Stage)	Age	Potential	
	Top	Base								Prehistoric Archaeology	Paleo-environmental
E	H070/P1	Not identified	N/A	Unit: typically, low amplitude, with some areas of moderate amplitude reflections. Exhibits both chaotic and layered appearance.	Very high to extremely high strength clay, with beds of sandy clay. Shell fragments and plant remains may be present and lenses and laminae of silt and fine-grained sand likely to be observed.	Subglacial to glaciomarine	Aberdeen Ground Formation	100 to 13	Tiglian to Cromerian	Very low	Low

2.3 Maritime and Aviation Sites

29. Within the study area there are no Historic Marine Protected Areas designated under the Marine (Scotland) Act 2010 and no wrecks which are protected under the Protection of Military Remains Act 1986. Similarly, no aviation remains have been positively identified, although, if any military aircraft remains are identified these would be protected under the Protection of Military Remains Act 1986.

30. SSS, MBES and magnetometer data interpreted by MSDS Marine (2024) has demonstrated the presence of several seabed features which have been identified at varying levels of archaeological potential as set out in **Table 2.2**.

Table 2.2: Criteria for the Assessment of Archaeological Potential

Potential	Criteria
Low	An anomaly potentially of anthropogenic origin but that is unlikely to be of archaeological significance – examples may include discarded modern debris such as rope, cable, chain, or fishing gear; small, isolated anomalies with no wider context; or small boulder-like features with associated magnetometer readings.
Medium	An anomaly believed to be of anthropogenic origin but that would require further investigation to establish its archaeological significance – examples may include larger unidentifiable debris or clusters of debris, unidentifiable structures, or significant magnetic anomalies.
High	An anomaly almost certainly of anthropogenic origin and with a high potential of being of archaeological significance – high potential anomalies tend to be the remains of wrecks, the suspected remains of wrecks, or known structures of archaeological significance.

31. In total 184 surface anomalies of potential archaeological interest were identified within the study area by MSDS Marine. The distribution of anomalies identified interpreted from the geophysical data is categorised by potential in **Table 2.3** with their spatial distribution illustrated on **Figure 7** of **Appendix 15.1: Archaeological Assessment of Geophysical and Hydrographic Data (Volume IV)** in the Bellrock WFDA EIA Report.

Table 2.3: Distribution of Archaeological Anomalies by Potential

Potential	Within the Bellrock WFDA	Within 1 km Buffer of WFDA	Total
Low	108	62	170
Medium	8	2	10
High	3	1	4
Total	**119**	**65**	**184**

32. Anomalies interpreted as being of low archaeological potential are a mixture of small features, often boulder-like, or likely to represent modern debris such as chain, cable, or rope, or small items of debris with no features indicating archaeological potential. 170 of the anomalies within the study area were interpreted as being of low archaeological potential, 108 of these are within the Bellrock WFDA. The low potential anomalies are further categorised as shown in **Table 2.4** with their spatial distribution illustrated on **Figure A.2** and **Figure A.2a (Appendix A)**.

Table 2.4: Low Potential Anomaly Categories

Anomaly Category	Within the Bellrock WFDA	Within 1 km Buffer of WFDA	Total
Chain, cable, or rope	50	34	84
Likely geological	8	5	13
Potential debris	19	9	28
Linear feature	10	3	13
Fishing gear	14	9	23
Seabed disturbance	0	1	1
Anchor - modern	7	1	8
Total	**108**	**62**	**170**

33. Features interpreted as being of medium archaeological potential have characteristics that indicate possible anthropogenic material, or where a precautionary approach has been taken for anomalies where the identification is not clear. Ten anomalies were identified within the study area which have been interpreted as medium archaeological potential, eight of which are located within the Bellrock WFDA. These are categorised in **Table 2.5** with their spatial distribution illustrated on **Figure A.2** and **Figure A.2b (Appendix A)**.

Table 2.5: Medium Potential Anomaly Categories

Anomaly Category	Within the Bellrock WFDA	Within 1 km Buffer of WFDA	Total
Potential debris	2	0	2
Anchor - wreck	2	0	2
Wreck debris	1	0	1
Mound	1	2	3
Seabed disturbance	2	0	2
Total	**8**	**2**	**10**

34. Four anomalies were interpreted as being of high archaeological potential within the geophysical survey extents. Three of these lie within the Bellrock WFDA. The anomalies have been categorised as follows in **Table 2.6** with their spatial distribution illustrated on **Figure A.2** and **Figure A.2c (Appendix A)**.

Table 2.6: High Potential Anomaly Categories

Anomaly Category	Within the Bellrock WFDA	Within 1 km Buffer of WFDA	Total
Wreck	3	0	3
Potential wreck	0	1	1
Total	**3**	**1**	**4**

35. The 'known' wrecks and anomalies with high potential to be wrecks, or associated debris, within the study area are summarised in **Table 2.7**.

36. In addition to the geophysical anomalies identified by MSDS Marine, there are three records charted by the UKHO, and a single record charted by both UKHO and CANMORE One of the UKHO records (102075) corresponds to BR24_142 in **Table 2.7**. Two of the UKHO records (102135 and 102136) appear to have errors in their recorded position and likely correspond to BR24_070 and BR24_067. UKHO record 3209 relates to the wreck of the *Karen*, a fishing vessel sunk in 1978. The record was created following a reported sinking, and no evidence of a potential wreck were identified within the geophysical and hydrographic data obtained from the Bellrock WFDA surveys. It is highly unlikely that the remains of the vessel lie at the stated position. It is possible that any one of the three, unidentified wrecks, or the potential wreck, interpreted from the data by MSDS Marine could represent the physical remains of the *Karen*, although as there is no record of the dimensions, construction type, etc. there is no evidence to support a potential correlation at this time.

Table 2.7: Known Wrecks and Unidentified High Potential Anomalies within the Study Area

MSDS Marine ID	UKHO ID	Description
BR24_067 Figure 18 in **Appendix 15.1 (Volume IV in the Bellrock WFDA EIA Report)**	102135 or 102136 (possibly)	Unidentified wreck visible in both the SSS and MBES data (33.9 m x 7.5 m with a measurable height of 3.6 m) with a corresponding magnetic anomaly of 127.3 nT. A linear feature extends from the bow terminating in what is believed to be anchor (medium potential BR24_068). Whilst the feature could represent snagged fishing gear, the origination from the bow of the wreck likely indicates the anchor and associated chain. The form of the wreck and associated magnetic anomaly, suggests steel construction.
BR24_070 Figure 19 in **Appendix 15.1 (Volume IV in the Bellrock WFDA EIA Report)**	102135 or 102136 (possibly)	Unidentified wreck visible in both the SSS and MBES data (31.8 m x 6.9 m with a measurable height of 3.4 m) with a corresponding magnetic anomaly of 148.7 nT. The wreck is upright and orientated east-west with what appears to be the bow towards the west. The wreck is largely intact however; there seems to be a degree of

MSDS Marine ID	UKHO ID	Description
		deterioration. The SSS data appears to show deck beams running port to starboard. Amidships there is an upstanding feature with debris extending outside of the line of the hull to the south by 2.4 m. One significant item of debris (medium potential BR24_071) lies 135 m to the east. The form of the wreck, and the associated magnetic anomaly, suggests steel construction.
BR24_142 Figure 21 in **Appendix 15.1 (Volume IV in the Bellrock WFDA EIA Report)**	102075	Unidentified wreck visible in both the SSS and MBES data (49.4 m x 8.9 m with a measurable height of 6.1 m) with a corresponding magnetic anomaly of 140.8 nT. The form of the wreck suggests a large degree of collapse in particular towards amidships, it is not clear whether this is from natural degradation or a break in the hull from the wrecking event. A number of small depressions, potentially indicating debris with scour, are noted around the wreck. Extending 108.3 m south-southwest from the bow is a linear feature terminating in what is believed to be the anchor (medium potential BR24_143). The form of the wreck and associated magnetic anomaly, suggests steel construction.
BR24_101 Figure 20 in **Appendix 15.1 (Volume IV in the Bellrock WFDA EIA Report)**	N/A	Potential wreck visible in both the SSS and MBES data with no corresponding magnetic anomaly. The anomaly is a concentration of small features, including linear features, distributed over an area 43.5 m x 13.4 m with a measurable height of 1.3 m. The assessment as of high potential is precautionary, there is the potential for the features to represent geological material such as boulders, however, this is unusual in the surrounding seabed area. The overall shape, dimensions, and the presence of linear features may indicate anthropogenic debris, and potentially the remains of a wrecked vessel.

37. In addition to these seabed features there are 202 magnetic anomalies, ranging between 5.0 nT and 309.9 nT, within the study area which do not correlate with known, or visible, features or infrastructure. The distribution of these anomalies is illustrated on **Figure A.3 (Appendix A)**. Anomalies identified from the magnetometer data are ferrous and thus generally anthropogenic in origin although they can be associated with geological features, however, there is no visual interpretation as with other geophysical data. All isolated magnetic anomalies of 50 nT or less are considered to be of limited potential to be of archaeological significance. This is however dependant on the distance from the sensor.

2.4 Impact Assessment Summary

38. With the application of the embedded mitigation (**Section 1.4**), all direct impacts to known heritage assets was avoided through the application of AEZs and micro-siting of the design (**no change**).

39. In addition, further investigation, post-consent, will reduce probability of encountering previously undiscovered archaeological material during construction, O&M or decommissioning so that unexpected discoveries was limited, as far as possible, to isolated finds, rather than in situ sites.

With the application of the PAD, to ensure that unexpected discoveries are reported, which will allow for the archaeological interest of finds to be established, and additional mitigation measures applied where necessary, the overall the effect is predicted to be of **minor adverse** significance.

40. With respect to submerged prehistory, the assessment undertaken to date indicates a very low archaeological potential for most identified units suggesting that the probability of impacts occurring is also very low. Units D1 and D3 have been attributed a low, and low to moderate, potential for palaeoenvironmental remains, respectively. As such, these units may benefit from further investigation with the potential contribution to the body of scientific data available for the study of seabed prehistory within the region resulting in a **minor beneficial** effect.

3 Roles and Responsibilities

41. Overall responsibility for the implementation of the WSI and PAD was the Applicant who will ensure that their agents and contractors are contractually bound to adhere to the terms of the WSI and to implement the PAD. Specific roles and responsibilities are summarised in **Table 3.1**.

Table 3.1: Roles and Responsibilities

The Applicant	
Responsibilities:	The Applicant will act as a first point of contact for staff and will liaise with the retained archaeologist regarding the implementation of mitigation measures with respect to archaeology and cultural heritage. Specifically, the Applicant was responsible for: ▪ Engagement of and continuing liaison with the retained archaeologist; ▪ Approval of the WSI and associated method statements and technical reporting on behalf of the Applicant ; ▪ Ensuring ongoing compliance with the WSI, supported by the retained archaeologist; ▪ Reporting, returns and notifications to MD-LOT and heritage stakeholders as required by the consents for the Bellrock Wind Farm Infrastructure within the Bellrock WFDA; and ▪ Distribution of archaeological briefing notes (see **Section 4** below) to contractors and ensuring the inclusion of archaeological requirements at mobilisation/kick off meetings as advised by the retained archaeologist.
Retained Archaeologist	
Responsibilities:	The Applicant will retain the services of a suitably qualified and experienced archaeological contractor or consultant to act as the retained archaeologist and the initial point of contact for the Project team. Specific responsibilities include: ▪ Compiling this WSI in consultation with the Applicant, the regulator (MD-LOT) and heritage stakeholders, and updating as required throughout the operational life of the infrastructure; ▪ Advising the Applicant on their responsibilities regarding the implementation of the WSI and PAD; ▪ Compiling, agreeing and issuing any necessary method statements for archaeological contractors to adhere to, in consultation with the Applicant and the regulators (MD-LOT) and heritage stakeholders; ▪ Advising the Applicant on the necessary interaction with the regulator (MD-LOT), heritage stakeholders and other third parties; ▪ Develop and deliver training on relevant aspects of the WSI and PAD to the Applicant's personnel including input to inductions, presentations, and production of awareness materials; ▪ Supporting the Applicant in procuring, monitoring the work of, and liaising with specialist archaeological contractors, where necessary; ▪ Monitoring the preparation and submission of archaeological reports as appropriate and making them available to the regulator (MD-LOT) and heritage stakeholders for review and approval; and

	▪ Advising the Applicant on any final requirements and arrangements for further assessment, analysis, archive deposition, publication and popular dissemination.
Archaeological Contractors	
Responsibilities:	For each package of archaeological works considered necessary, as agreed the regulator (MD-LOT) and heritage stakeholders, the Applicant or their agents will, as required, procure the services of specialist archaeological contractors with the requisite experience and expertise to undertake the necessary works. The specific roles and responsibilities of the archaeological contractors was set out in the relevant method statement for the works.
Project Personnel and Contractors	
Responsibilities:	All personnel and contractors shall ensure that their own procedures encompass and fully discharge the mitigation and management measures and commitments presented in this WSI and PAD. Adherence to the WSI and PAD was a contractual requirement. All agents and contractors engaged by the Applicant will: ▪ Familiarise themselves with the requirements of this document and make it available to their staff and sub-contractors, explaining the requirements and need for strict adherence; ▪ Ensure the implementation of and adherence to this document by their staff, including ensuring staff awareness of the PAD through dissemination of briefing notes and making staff available for mobilisation/kick off meetings; ▪ Assist and afford access to archaeological contractors as advised by the Applicant and the retained archaeologist; and ▪ Inform the retained archaeologist and any archaeological contractors of any environmental or health and safety constraints of which they may be aware that is relevant to the archaeologist's activities on site.
Offshore Client Representatives	
Responsibilities:	Offshore Client Representatives will act as 'Site Champions' under the PAD, a single person on each vessel (or within each worksite team) who is responsible for reporting discoveries to the Nominated Contact (an identified individual in the Project team). The responsibilities of a Site Champion are to: ▪ Implement and ensure observation of temporary exclusion zones (TEZ) (see **Section 6.1**) if required; ▪ Confirm details of discovery and ensure preliminary record forms are completed; ▪ Inform the Nominated Contact; and ▪ Feedback information to site staff.
Relevant Authorities	
Responsibilities:	MD-LOT, acting on behalf of Scottish Ministers, was responsible for discharging/ensuring compliance with the consent conditions for the Bellrock Wind Farm Infrastructure within the Bellrock WFDA. HES is the statutory body for archaeology and cultural heritage within Scotland including marine archaeology in waters adjacent to the Scottish coast up to the Mean High Water Mark and out to 200 nautical miles. In the event of a significant discovery, MD-LOT and the relevant heritage stakeholders was informed of any archaeological or cultural heritage finds, and will as soon as reasonably practicable: ▪ Liaise with other relevant archaeological authorities;

	▪ Advise on proposals to further evaluate any finds; and ▪ Advise on proposals to mitigate the effects of work activities upon any finds, if required.

4 Training and Awareness

42. The Applicant, their agents and contractors will ensure that all employees and sub-contractors are made aware of the content of the WSI and PAD that is applicable to them.

43. For each relevant work package (as advised by the retained archaeologist) a briefing note was prepared by the retained archaeologist setting out the responsibilities of all staff and contractors engaged in undertaking works within the Bellrock WFDA with respect to marine archaeology and cultural heritage.

44. The Applicant and their contractors was responsible for ensuring that all relevant staff are issued the briefing note in advance of works commencing and will also ensure awareness through kick off and mobilisation meetings. This may be delivered as a targeted induction or as part of a larger site induction. Inductions to the site shall include, as a minimum:

- Identification of specific archaeological impacts associated with the work to be undertaken on site by the inductee;
- Any site or task specific mitigation that is required in order to comply with commitments made in the WSI including, for example, the avoidance of AEZs and additional anomalies and adherence to the PAD in the event of an unexcepted discovery;
- Role of the retained archaeologist and contact details;
- Key roles defined in the PAD (i.e. Nominated Contact and Site Champions) and contact details; and
- Any other relevant information including work package specific tasks to support the delivery of this WSI and PAD.

45. For specific work packages a tailored toolbox talk may also be required to be provided by the retained archaeologist as relevant. For example, for surveys/site investigations additional training may be required to ensure that all operatives are fully informed of the archaeological objectives and requirements for acquiring and delivering data as necessary to understand the archaeological interest of investigated features. The retained archaeologist will advise the Applicant when, and for which work packages, tailored toolbox talks was required. Training was provided by the retained archaeologist or archaeological contractor as relevant to the specific work package.

5 Methodology for Further Site Investigation

5.1 Marine Geophysical Investigations

46. As set out in the Bellrock WFDA EIA Report (**Chapter 15: Marine Archaeology and Cultural Heritage (Volume II)**) and in **Section 1.4** above, embedded mitigation measures for the infrastructure and associated activities of the Bellrock WFDA includes the analysis of high-resolution geophysical data to be acquired post-application/post-consent in order to reduce, as far as practicable, the probability of an impact occurring during construction.

47. Following on from the assessments undertaken for the EIA Report and summarised in **Section 2**, further pre-construction marine geophysical data was acquired for the WFDA, anticipated to include the acquisition of MBES, SSS, SBP and magnetometer data within refined layouts.

48. The specification of any proposed marine geophysical surveys whose primary aim is non-archaeological was subject to advice from the retained archaeologist. This will ensure that archaeological input is provided at the planning stage and will enable archaeological considerations to be considered without compromising the primary objective of the survey. This will also ensure that the data was sufficiently robust to enable professional archaeological interpretation and analysis. As stated in The Crown Estate (2021) guidance, archaeological input will take the form of advice on the following points:

- Available details of sites, features and/or anomalies identified in previous studies;
- Archaeological potential of areas where no existing sites, features and/or anomalies are yet known;
- Geophysical survey specification including design, geophysical sources and acquisition methodology; and
- Requirements for processing and interpreting of resulting data.

49. A series of archaeological objectives was established based upon the results of the assessments undertaken to date with reference to relevant research frameworks (e.g. ScARF). Objectives will include:

- The clarification/identification of known heritage assets and provision of additional detail on the nature and extent of those assets;
- The identification of previously unidentified seabed features;
- The clarification/identification of buried palaeolandscape features that help to clarify the nature of the submerged prehistoric landscape; and
- The monitoring of construction and post-construction effects.

50. Before any further geophysical survey takes place, the retained archaeologist will advise the Applicant if a method statement is required to ensure the suitability of any data to meet defined archaeological objectives and to answer any questions which may have arisen from the results of previous assessments.

51. Should a method statement be required, this was prepared in consultation with relevant heritage stakeholders and issued by the Applicant to MD-LOT a minimum of six weeks prior to any further geophysical survey commencing. The Applicant was responsible for ensuring that all surveys proceed in line with any planned method statement as agreed with heritage stakeholders and submitted to MD-LOT.

52. It should be noted that not all archaeological remains can be identified through geophysical survey, particularly non-ferrous buried remains such as wooden vessels. Specific consideration will, therefore, need to be given to the scope of geophysical surveys which incorporate archaeological objectives. The limitations of geophysical equipment to penetrate deep into mobile sediment where archaeological material, particularly non-ferrous material, could be buried must also be considered.

53. On completion of the geophysical surveys the data was processed, assessed and interpreted by an experienced and qualified archaeological contractor. Geophysical survey data was supplied for assessment to an agreed technical standard and specification, together with operational reports and trackplots. Where possible full-fidelity data unreduced in range, frequency, sampling and dimensionality from that recorded must be used as the input for archaeological interpretation. Full detail on the provision of data for assessment is provided in The Crown Estate guidance (2021).

54. The results of further geophysical interpretation was compiled as an archaeological technical report consistent with the methodologies for reporting set out in The Crown Estate (2021) guidance and will form part of the project archive as set out in **Section 10.6.** This was issued by the Applicant to MD-LOT within six months of the completion of the archaeological assessment of the geophysical data. The resulting spatial interpretation data, such as the locations and extents of identified features and/or deposits of archaeological potential, was provided alongside the compiled report in a suitable digital format, such as geographic information system (GIS) shapefiles or CAD drawing files as agreed with the Applicant and heritage stakeholders where applicable. All reports and digital deliverables relating to the assessment was made available for subsequent data interpretations that may be required during the O&M or decommissioning phases of the Bellrock Wind Farm Infrastructure within the Bellrock WFDA.

5.2 Marine Geotechnical Investigations

55. Geoarchaeological assessment of geotechnical data acquired for the project forms part of the commitment by the project team to additional mitigation and investigations.

56. There are currently no known prehistoric sites within the Bellrock WFDA and, as described in **Section 2.2,** no deposits associated with phases of possible human occupation have been identified. Units D1 and D3, which have a moderate and low to moderate potential, respectively, for palaeoenvironmental remains, to further our understanding of environments and the timing of the marine inundation following the Last Glacial maximum but these are located at depths which would be unlikely to impacted during construction.

57. Detail on the key tasks and aims associated with marine geoarchaeological investigation and assessment are set out in The Crown Estate guidance (2021, Table 4). In summary, these tasks include:

- Geoarchaeological input into EIA (to provide a baseline understanding of key deposits and their archaeological significance);
- Geoarchaeological input into geotechnical survey planning (to ensure archaeological objectives are considered in the planning stage of the geotechnical survey);
- Review of geotechnical logs (to establish the likely presence and depth of deposits of archaeological interest and provide a broad characterisation of the site);
- Recording of geotechnical cores (to preserve by record individual core or borehole samples of potential archaeological interest);
- Archaeological sampling (to retain adequate samples (quantity and quality) for palaeoenvironmental assessment and analysis and dating); and
- Assessment and analysis (to provide a chronostratigraphic and palaeoenvironmental understanding of the area, to inform interpretation of geophysical datasets and ground model).

58. Geotechnical data has been acquired for the Bellrock WFDA which informed the assessment of Seabed Prehistory undertaken for the Bellrock WFDA EIA Report, as summarised in **Section 2.2**. Overall, the geological units identified are of limited archaeological potential and paleoenvironmental potential. However, units D1 and D3 have been attributed a low, and low to moderate, potential for palaeoenvironmental remains, respectively. As such, these units may benefit from further investigation.

59. Where geotechnical surveys are undertaken for primarily non-archaeological purposes, advice was obtained from the retained archaeologist, to ensure that archaeological considerations are considered. These surveys, and subsequent geoarchaeological assessment, was undertaken in accordance with The Crown Estate (2021) guidance and with industry best practice as set out in the Offshore Geotechnical Investigations and Historic Environment Analysis: Guidance for the Renewable Energy Sector (Gribble and Leather, 2011).

60. The geotechnical specification for further work was informed by any previous stages of work, for example the assessment undertaken for the Bellrock WFDA EIA Report. This will allow for previous and additional objectives to be achieved. It is anticipated that future geoarchaeological assessment was limited to a review of the borehole logs, due to the limited archaeological and palaoenvironmental potential of the geological units within the Bellrock WFDA. However, should any deposits of archaeological and palaoenvironmental interest be identified, these would require further assessment.

61. Geotechnical locations was micro-sited to avoid recommended AEZs, as described in **Section 6.1,** and anomalies of possible archaeological interest, as set out in **Section 6.2**.

62. The Applicant will procure the services of a specialist geoarchaeological contractor to undertake assessment, and, if required, palaeoenvironmental analysis and dating. The primary aim of any

geoarchaeological investigations was the development of a Quaternary (sedimentary) deposit model for the Bellrock WFDA.

63. Prior to the commencement of any site investigation campaign the retained archaeologist will advise the Applicant if a method statement setting out the specific details of the campaign was required. Should a method statement be required, this was prepared by the retained archaeologist in consultation with heritage stakeholders and issued to MD-LOT by the Applicant a minimum of six weeks prior to the work commencing. The Applicant was responsible for ensuring that surveys proceed in accordance with any planned method statement agreed with heritage stakeholders. Geotechnical cores, or a representative sample of cores agreed with the archaeological contractor, was retained undisturbed until a selection of cores for archaeological recording has been made. If the cores cannot be retained then further steps would be taken, such as having an archaeologist present during sampling operations. Geoarchaeological assessment was carried out in accordance with existing interpretations of SBP data assessed for the Bellrock WFDA to allow for the results of the geotechnical surveys to be incorporated with subsequent geoarchaeological assessment.

64. A report summarising the initial review of borehole logs was prepared and submitted to MD-LOT within six months of the completion of the geotechnical survey. If further geotechnical work is required a timetable would be agreed with heritage stakeholders at the time. The results of any further marine geoarchaeological assessments was compiled as an archaeological technical report consistent with the methodologies for reporting set out in The Crown Estate (2021) guidance and will form part of the project archive as set out in **Section 10.6**.

65. The final report will integrate the results of review, recording, assessment, analysis and dating. The report will address the palaeoenvironment and prehistory (and any other historical periods as relevant) of the Bellrock WFDA, including relevant data generated by desk-based assessment and other field investigations, including geophysical surveys. Where necessary, the geophysical data interpretation may need to be re-assessed depending on the findings of the geotechnical assessment. If warranted, publication of the findings was considered depending on the results of the assessment.

66. During all geotechnical surveys, all operatives will observe the PAD, as set out in **Section 6.3**. Archaeological briefings for survey staff was carried out prior to the commencement of surveys (see **Section 6.3**).

5.3 Non-archaeological Diver/Remotely Operated Vehicle Surveys

67. Prior to construction, remotely operated vehicle (ROV) or diver surveys may be undertaken for various non-archaeological purposes such as the refinement of the design parameters/layout, for ecological assessment, UXO investigation and obstruction inspection and/or removal. These diver and/or ROV investigations can also provide ground-truthing information which may be required to establish the archaeological interest of seabed features seen in the geophysical data.

68. All ground-truthing that may be required to inform the construction of the Bellrock Wind Farm Infrastructure was carried out in accordance with good practice as set out in The Crown Estate (2021) guidance.

69. To maximise the potential benefits of any proposed non-archaeological diver and/or ROV surveys, the Applicant will seek archaeological input from the retained archaeologist at the planning stage of any such works. Any survey specification was informed by previous stages of the works, so that archaeological considerations can be considered.

70. The selection of geophysical anomalies requiring ground truthing/assessment will require consideration of a multitude of factors. There may be a limited number of geophysical anomalies to assess which can easily be incorporated into the scope of planned ROV surveys. A number of geophysical anomalies identified as being of possible archaeological interest may also correspond to anomalies interpreted as potential UXO or obstructions, for example.

71. There is also potential for a large number of anomalies to be present within the footprint of potential impact, necessitating additional consideration to select an appropriate proportion of anomalies, for example, based on the size of the features or on their location within an area of archaeological potential. The specific approach to the selection of anomalies for ground-truthing was discussed as part of planning for diver and/or ROV surveys by the Applicant with the retained archaeologist in consultation with heritage stakeholders, which will then be captured in an associated method statement. This was prepared by the retained archaeologist and issued by the Applicant to MD-LOT a minimum of six weeks prior to the work commencing. The Applicant was responsible for ensuring that investigations proceed in line with any planned method statement as agreed with heritage stakeholders and submitted to MD-LOT.

72. Where the primary objectives of ROV or diver survey are non-archaeological, but may also contribute to archaeological objectives, consideration was given to having the retained archaeologist (or the archaeological contractor, if appointed), present during the surveys. For example, when surveying sites of archaeological interest or in areas of high archaeological potential the presence of an archaeological specialist will help to optimise archaeological results and thereby reduce the need for repeat survey. However, their inclusion would only occur when their input has been considered safe, appropriate and proportionate and has been agreed through consultation with heritage stakeholders.

73. For surveys without an archaeologist on-board, training was provided (i.e. through a briefing note supported by attendance at planned kick off meetings) to ensure that all operatives are fully informed of the archaeological objectives and requirements for acquiring and delivering data as necessary to understand the archaeological interest of investigated features.

74. All data, including the list of targets, target investigation reports and video footage, was made available for review by the retained archaeologist (or an archaeological contractor with appropriate expertise). It is recommended that the daily reports and target investigation reports are also provided regularly to the retained archaeologist during survey operations, to ensure timely archaeological advice.

75. If remains of archaeological interest are identified during diver/ROV surveys, where possible, they was avoided through the implementation of AEZs (**Section 6.1**). Where archaeological remains

cannot be avoided, if remains are small enough (e.g. anchors and other isolated finds) it may be possible to move these outside of the area of disturbance.

76. If large remains such as a wreck, which cannot be moved, are identified, consultation with heritage stakeholders was undertaken to determine whether an archaeological diver/ROV-based assessment is required. This would provide additional certainty on the nature and extent of the wreck, to understand whether micrositing to avoid an AEZs would be problematic within the consent and design parameters of the Bellrock Wind Farm Infrastructure and inform the specification for further mitigation. Any further work will require detailed methodologies to be set out in a method statement, to be developed in consultation with heritage stakeholders and submitted to MD-LOT. Discussions may also need to include the Receiver of Wreck (RoW) and if aircraft, the Ministry of Defence (MOD).

77. The results of diver/ROV assessment was compiled as an archaeological technical report consistent with the methodologies for reporting set out in The Crown Estate (2021) guidance and will form part of the project archive as set out in **Section 10.6**. This was issued by the Applicant to MD-LOT within six months after the completion of investigations. The report will identify those sites and/or geophysical anomalies that are of archaeological significance, and the outcomes of any further work. It will also identify and characterise those sites that are no longer of archaeological interest and hence may be removed from the list of AEZs or geophysical anomalies of possible archaeological interest, following consultation with heritage stakeholders The applicable digital data, including gazetteers and GIS shapefiles, was updated by the retained archaeologist and reissued to the Applicant and relevant contractors.

5.4 Archaeological Diver/Remotely Operated Vehicle-based Site Assessment

78. Where the primary objectives are archaeological and where they cannot be met through planned non-archaeological investigations, archaeological led diver or ROV-based investigations may be required.

79. As above, any planned survey was carried out in accordance with good practice as set out in The Crown Estate (2021) guidance and the survey methodology was set out in a method statement, prepared by the retained archaeologist (or the archaeological contractor, if appointed) in consultant with heritage stakeholders and submitted by the Applicant to MD-LOT a minimum of six weeks prior to the survey commencing. The Applicant was responsible for ensuring that investigations proceed in line with any planned method statement as agreed with heritage stakeholders and submitted to MD-LOT.

80. Diver/ROV assessment for archaeological purposes was directed by an archaeological contractor, with the appropriate expertise and experience of the environment/conditions likely to be encountered.

81. ROV surveys for archaeological purposes may either be undertaken by a suitably qualified and experienced archaeological contractor with an ROV, or by an archaeologist directing an ROV contractor.

82. Recording will take place in accordance with The Crown Estate (2021) guidance and was conducted to a level whereby a statement can be made as to the date, character, and extent of archaeological importance of the site, to inform an assessment of archaeological potential.

83. Similar to the approach outlined for non-archaeological surveys above, if a site is determined to be of high archaeological interest but cannot be avoided a plan for additional mitigation was required, such as the relocation of material and/or full excavation of a site. This work would require a method statement, to be prepared by the retained archaeologist and/or archaeological contractor through discussions with the Applicant and heritage stakeholders and submitted to MD-LOT.

84. The results of any archaeological diver/ROV assessment was compiled as an archaeological technical report consistent with the methodologies for reporting set out in The Crown Estate (2021) guidance and will form part of the project archive as set out in **Section 10.6**. The report will include any findings that may lead to the alteration of AEZs, as well as a statement of the likely requirements (if any) for further archaeological work. This would be prepared by the retained archaeologist and issued by the Applicant to MD-LOT six months following the completion of the work.

5.5 Archaeological Watching Briefs

85. As defined in The Crown Estate (2021) guidance, a watching brief is a formal programme of archaeological monitoring that involves attendance by a suitably qualified and experienced archaeologist during groundworks or other site activities/interventions associated with the scheme in the terrestrial or intertidal zone, and/ or marine activities such as during offshore obstruction clearance (where considered appropriate).

86. Should activities be undertaken which may result in disturbance to archaeological remains or remains being brought to the surface (e.g. clearance operations and Pre-lay Grapnel Run), an archaeological watching brief was required, comprising on board supervision by a suitably qualified and experienced archaeologist. If areas subject to clearance are considered to be of medium or high archaeological potential, on board monitoring may be required to ensure consideration is given to any archaeological material brought to the surface. In areas of low archaeological potential any material brought to the surface was dealt with through the PAD as set out in **Section 6.3**.

87. It is anticipated that the archaeological assessment of high-resolution pre-construction geophysical data (**Section 5.1**) will allow for the spatial identification of locations where the risk of encountering unexpected archaeological material is higher. For example, any area of seabed where large sand wave features are present, has greater potential for concealing archaeological remains, or areas where greater concentrations of geophysical anomalies of archaeological potential have been recorded. Watching briefs may also be required if micro-siting to avoid seabed and sub-seabed features of potential archaeological interest is not possible.

88. Whilst not common practice offshore, should an on-board watching brief be required, the approach will accord with that set out in The Crown Estate (2021) guidance and was set out in a method statement prepared by the retained archaeologist in consultation with heritage stakeholders and submitted by the Applicant to MD-LOT a minimum of six weeks prior to the watching brief commencing. If significant archaeological material or palaeoenvironmental deposits are

encountered then the Applicant, in consultation with heritage stakeholders, will make provision for the retained archaeologist (or the archaeological contractor, if appointed), to undertake a programme of investigation commensurate with the evidence discovered.

89. Recording and reporting for any watching briefs, was undertaken in line with the approaches set out in The Crown Estate (2021) guidance and other relevant guidance such as Chartered Institute for Archaeologists (CIfA - 2020a) Standards and guidance for an archaeological watching brief. The resulting report would be issued by the Applicant to MD-LOT within six months following the completion of the watching brief.

6 Delivery of Mitigation

6.1 Archaeological Exclusion Zones

90. AEZs agreed between the Applicant and MD-LOT was the primary means employed to preserve features or remains of archaeological interest or potential in-situ. The principal objective of an AEZ is to prevent damage to, or disturbance of, a wreck, aircraft or features of potential archaeological interest on the seafloor during activities that may cause damage or disturbance.

91. The implementation, monitoring and modification of AEZs will take place in accordance with the measures specified in The Crown Estate (2021) guidance.

92. AEZs comprise a boundary placed around a heritage asset or potential assets where no development activities (i.e. installation of Bellrock Wind Farm Infrastructure, temporary works on the seabed or seabed disturbance) can be undertaken. The AEZs will extend from the boundary of the assets and will include a buffer to ensure that all material associated with that asset is encapsulated inside the boundary, as well as to reduce the risk of unintentional impacts. AEZs comprising a circle consisting of a centre-point with a radius distance may be applied if the extents of a feature are unknown (e.g. a very large magnetic anomaly without surface expression) or if the item comprises a small, isolated find (e.g. an anchor or similar small item of wreck debris).

93. The position, extent and design of any AEZs, including the size of the buffer, will consider all available information including geology, hydrology and sediment transport. As most AEZs will not be a standard shape (i.e. they comprise a buffer around the known extents of the site rather than a circle consisting of a centre-point with a radius distance), the AEZs agreed during the EIA process must be supplied as a GIS shapefile.

94. The list of AEZs is 'live' and was held in the project GIS maintained by the retained archaeologist. The Applicant will supply the retained archaeologist (if different from the previous process) and all contractors with the agreed AEZs as shapefile data. In addition, all documentation required for project delivery provided to contractors will include the lists and illustrated locations of AEZs.

95. Four high potential anomalies, and ten medium potential anomalies, have been identified within the geophysical survey data extents, of which three high potential and eight medium potential anomalies lie within the Bellrock WFDA. AEZs have been recommended for all high and medium anomalies within the Bellrock WFDA. The location and size of AEZs are presented in **Table 6.1 a**nd illustrated on **Figure A.4 (Appendix A).**

Table 6.1: Location of AEZs in the Bellrock Wind Farm Development Area

Anomaly ID	Description	Potential	WGS84 UTM Zone 30N		AEZ Distance (from Boundary of Heritage Asset) (m)
			X (Easting)	Y (Northing)	
BR24_067 (incorporating medium potential BR24_068)	Wreck	High	675109.7	6300567.3	50
BR24_070	Wreck	High	675182.3	6304895.3	50
BR24_142 (incorporating medium potential BR24_143)	Wreck	High	687344.0	6301679.0	100
BR24_069	Potential debris	Medium	675054.6	6301818.6	25
BR24_071	Wreck debris	Medium	675330.2	6304868.2	25 (radius around centre point)
BR24_073	Potential debris	Medium	675268.6	6304437.7	25
BR24_094	Seabed disturbance	Medium	678064.1	6303011.4	25
BR24_103	Seabed disturbance	Medium	678948.9	6308574.5	25
BR24_117	Mound	Medium	681989.3	6299052.9	25

96. As set out in The Crown Estate (2021) guidance, AEZs may be altered (enlarged, reduced, moved or removed) as a result of further data assessment or archaeological field evaluation covering those areas that are subject to AEZs. Similarly, further AEZs may be recommended following the completion of the archaeological assessment of pre-construction geophysical data. If new finds of potential archaeological significance come to light during the course of construction, or during O&M or decommissioning phases, for example, as reported through the PAD (**Section 6.3**) they may be subject to the implementation of a TEZ. A TEZ will prevent impact to the seabed within the extent but allow activities in other areas outside the TEZ to continue.

97. The need for and the design (position, extent) and implementation of any new AEZs (or TEZs, which may be formalised and converted to AEZs), or any alterations to existing AEZs, was subject to discussions between the retained archaeologist and the Applicant, and in consultation with heritage stakeholders, confirmed with a formal response. Following alteration, updated details of the AEZs was issued to each relevant party as GIS shapefiles.

6.2 Avoidance and Further Mitigation

98. As AEZs have been recommended for all high and medium potential anomalies within the Bellrock WFDA and impacts to low potential anomalies was mitigated through the PAD (**Section 6.3**) micrositing to avoid these low potential/low amplitude magnetic anomalies, is not anticipated to be required. If an AEZs is not investigated (i.e. medium or high potential anomaly of uncertain archaeological interest/origin) the AEZs will remain in place and avoided by Bellrock Wind Farm Infrastructure or disturbance. In such circumstances these would only be investigated further where avoidance is difficult or not possible.

99. Recommendations for further investigation and avoidance of AEZs was discussed by the retained archaeologist with the Applicant's design teams following completion of the pre-construction archaeological assessments (**Section 5.1**).

100. This will comprise a strategy for further investigation (ground truthing) as set out in **Section 5.3** and **Section 5.4** above. Ground truthing may also be required to clarify the extent of a potential archaeological feature of interest in order to alter (enlarge, reduce, move or remove) AEZs as set out in **Section 6.1**.Palaeogeographic features such as palaeochannels do not require AEZs or avoidance, but rather potential impacts are mitigated and offset through further assessment of existing material or further investigation, for example through geoarchaeological assessment as set out in **Section 6.1**.

6.3 Protocol for Archaeological Discoveries

101. To account for unexpected discoveries of archaeological material during construction, O&M and decommissioning of the Bellrock Wind Farm Infrastructure, a formal PAD was required. To this end, if any objects of possible archaeological interest are encountered, they was reported using a PAD based on the PAD: Offshore Renewables Projects (The Crown Estate 2014) (ORPAD). This will establish whether the objects are of archaeological interest and allow for appropriate mitigation measures to be recommended where necessary. Activities during which previously unidentified sites or unexpected discoveries of material which may be encountered include:

- Site preparation works, for example:
  - Obstructions on the seabed encountered during geotechnical surveys or grab sampling;
  - Archaeological material within cores or grab samples;
  - Seabed features identified during ROV surveys; and
  - Archaeological material encountered during Pre-lay Grapnel Run (e.g. finds brought to the surface) and clearance of UXO, boulders and other debris, sand wave levelling or slope levelling.
- Vessel anchoring (e.g. anchor caught on obstruction);
- Installation of IAC (e.g. obstruction interactions during cable lay and burial); and
- Installation of anchors and mooring lines.

102. The PAD will apply to construction, and O&M activities when an archaeologist is not present on site. The PAD will allow for the effective reporting of discoveries of archaeological material to ensure that advice, concerning measures to address discoveries, is received, and implemented, in a timely and efficient manner.

103. Under the PAD, each vessel or worksite team has a Site Champion (anticipated to be the Offshore Client Representative), a single person who is responsible for reporting discoveries to a Nominated Contact within the Applicant's core team. The Nominated Contact will report any new discoveries to the retained archaeologist who was responsible for implementing the PAD.

104. The Applicant was responsible for ensuring that teams are provided with appropriate training in the application of the protocol and that all staff and contractors are aware of their responsibilities under the protocol. The protocol documentation, including a full description of the methodology and requirements for implementing the protocol will mirror that of the ORPAD (The Crown Estate, 2014).

105. To ensure the effectiveness of the protocol, relevant project staff and contractors was provided with protocol awareness training in the form of a survey start-up briefing or a toolbox talk, in order to:

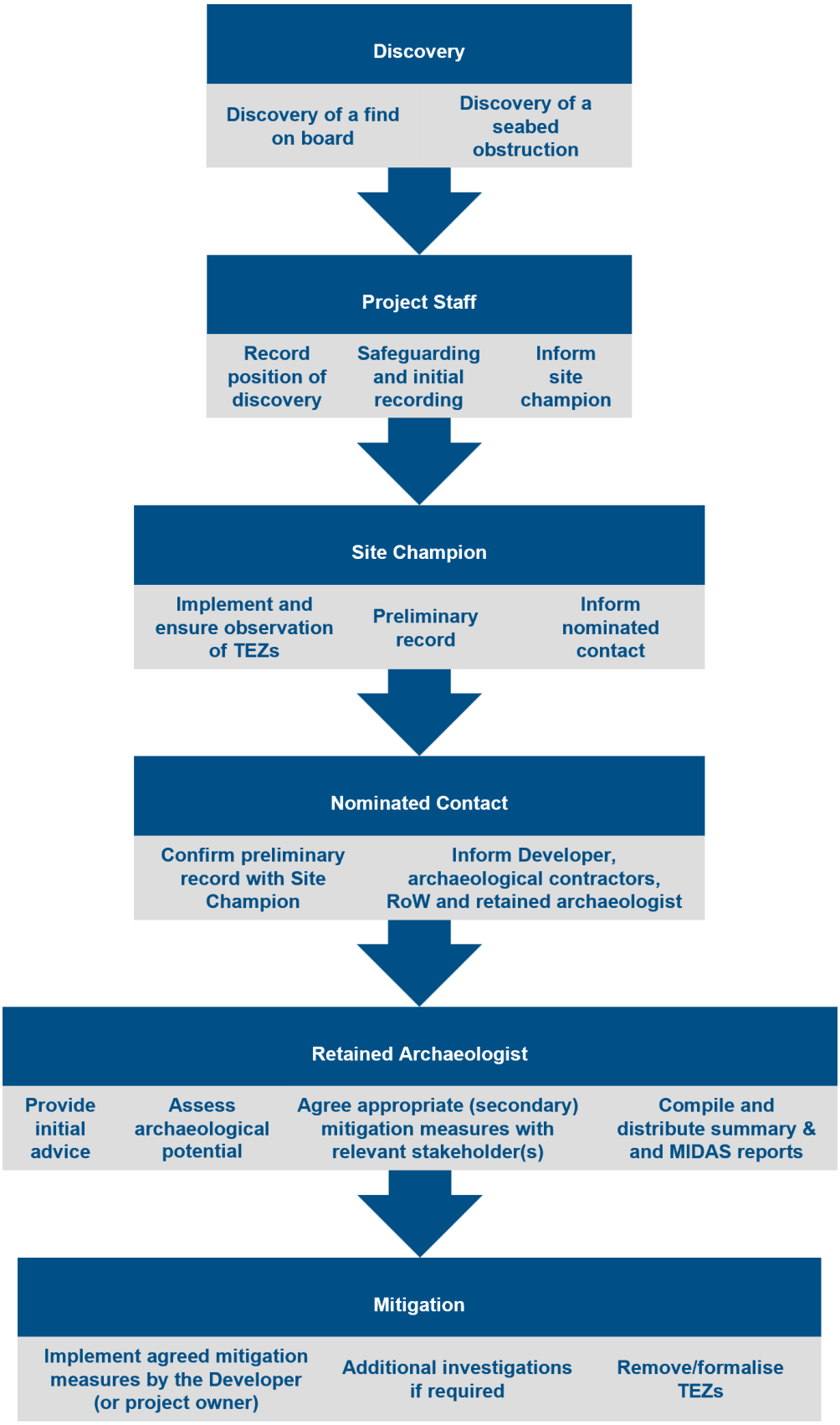
- Understand their role in the process;
- Recognise finds of archaeological potential;
- Understand how to record them; and
- Be aware of the reporting process.

106. Provision was made by the Applicant, in accordance with the PAD, for the prompt reporting/recording to MD-LOT and heritage stakeholders of any archaeological remains encountered or suspected during works. If the find is a wreck within the meaning of the Merchant Shipping Act (1996) then a report will also be made to the RoW.

107. Within six months of the Bellrock Wind Farm Infrastructure Commercial Operation Date, a report was prepared presenting the results of the PAD implementation during construction activities and submitted to MD-LOT. In the event that no discoveries are made, a nil discoveries report was compiled and submitted to demonstrate adherence to the scheme.

108. A flowchart setting out the process for reporting discoveries under the PAD is included in **Plate 6.1** below.

Plate 6.2: Process for Reporting Discoveries Under the Protocol for Archaeological Discoveries



7 Monitoring Requirements

109. The performance of this WSI was monitored over the lifetime of the Bellrock Wind Farm Infrastructure within the Bellrock WFDA. If changes are made to the project design or if particular archaeological issues come to the fore, revisions would be made to the WSI after agreement with MD-LOT in consultation with heritage stakeholder. As set out in MD-LOT's advice on mitigation and monitoring plans for offshore renewables projects (MD-LOT, 2025) '*Licence or consent conditions will allow plans to be updated as required throughout the operational life of the infrastructure e.g. as may be required for any adaptive management measures*.'

110. The reports prepared for each archaeological work package was distributed to MD-LOT by the Applicant. This will allow for results to be reviewed and any archaeological concerns to be addressed.

111. All assessment reports undertaken for the purposes of archaeological evaluation was submitted to MD-LOT within six months of each works package being completed.

112. As required by The Crown Estate (2021) guidance, provision for monitoring any agreed AEZs was set out in a method statement agreed between the Applicant and MD-LOT (in consultation with heritage stakeholders) in reference to any relevant regulatory consent. Monitoring will take place relative to the baseline data used to establish the AEZs and continue for the duration agreed between the Applicant and MD-LOT (in consultation with heritage stakeholders), as set out in the WSI and subsequent method statements.

113. This may include, for example, periodic archaeological reports prepared by the retained archaeologist, to monitor the effectiveness of the AEZs. These reports will review whether any incursions have been made into any of the AEZs and whether there is still an archaeological need for maintaining them. The frequency of the reports was agreed with MD-LOT through consultation with heritage stakeholders but would likely include reports at key phases of construction and a post-construction report. This would include an assessment of post-construction geophysical data. If it becomes clear that activities have encroached upon an AEZs, the Applicant will seek advice from the retained archaeologist.

114. A post-construction monitoring report including the archaeological assessment of post-construction geophysical survey data relative to the baseline data will also assess the effects of any indirect impacts that may have occurred to heritage assets as a result of the construction of the Bellrock Wind Farm Infrastructure. Based on the results of the initial post-construction review, any further requirements during the O&M phase was agreed with MD-LOT in consultation with heritage stakeholders.

8 Operation and Maintenance and Decommissioning Activities

115. During the O&M, and decommissioning phases, activities which may have the potential to impact marine archaeology include but are not limited to the anchoring of service or repair vessels, the placement of jack-up legs in areas not previously impacted by construction activities, or changes to the IAC route during maintenance or repair.

116. Prior to the commencement of each phase, the WSI and PAD was reviewed and updated, if required, in line with licence or consent conditions (MD-LOT, 2025). The approach to mitigation during these phases was set out in method statements as relevant to that phase, prepared by the retained archaeologist taking account of best practice and industry standard guidance at that time. It is anticipated that the primary form of mitigation was through the retention of agreed AEZs (**Section 6.1**) throughout the project lifetime. The PAD (**Section 6.3**) will also continue to apply during O&M and decommissioning to deal with any unexcepted discoveries. In addition, as stated in The Crown Estate (2021) guidance, during the O&M phase, monitoring of AEZs was undertaken if it becomes apparent that O&M activities that could impact the seabed have taken place within any AEZs.

117. The construction project team will ensure that the O&M project team and any contractors have received the latest data regarding AEZs and features of archaeological potential. Where AEZs have not been recommended and which were not investigated as part of planned ROV investigations, continued avoidance of these features by micro-siting is recommended if they are proposed to be directly impacted O&M activities (i.e. anchoring or placement of jack-up feet).

118. Following review of the post-construction monitoring data, an updated gazetteer of AEZs was provided to contractors to inform this continued avoidance throughout the O&M phase.

119. Where decommissioning requires a separate Marine Licence, all information required for the decommissioning activities was submitted at the time of the decommissioning application. Any specific requirements for decommissioning was established with the regulator and heritage stakeholders as relevant and in accordance with best practice and industry standard guidance at that time.

9 Archaeological Recording, Samples and Artefacts

120. As required by The Crown Estate (2021) guidance, archaeological recording and assessment of samples and artefacts was undertaken with the goal of addressing objectives set out in published research frameworks, for example, national research frameworks and regional research frameworks for specific periods or specialisms (such as the ScARF).

121. The Crown Estate (2021) guidance sets out high-level methodologies for:

- Indexing and recording systems;
- Position-fixing and levelling;
- Environmental sampling strategies;
- Environmental samples: handling, labelling, packaging and storage;
- Artefacts: handling, labelling, packaging and storage;
- Ordnance;
- Human remains;
- Aircraft;
- Wreck; and
- Materials conservation and storage.

122. Any archaeological remains or environmental samples that are found during construction, O&M and decommissioning of Bellrock Wind Farm Infrastructure was treated in accordance with this guidance and best practice as set out, for example, in:

- Standards and guidance for the collection, documentation, conservation and research of archaeological materials (CIfA 2020); and
- First Aid for Underwater Finds (Robinson 1998).

123. Isolated discoveries of artefacts that may come to light during the course of construction, O&M and decommissioning of the Bellrock Wind Farm Infrastructure was dealt with through the PAD as set out in **Section 6.3**.

124. Each method statement for activities where archaeological materials might be encountered will set out the approach to recording and dealing with samples and artefacts as relevant for each work package based on all relevant and specific guidance and best practice. A general summary of key requirements is included below.

125. Any finds recovered or exposed during archaeological works will, at the point of discovery, be held by the archaeological contractor in appropriate conditions pending further recording, investigation, study, or conservation. All finds was recorded and labelled appropriately. Where it is impracticable to recover finds these was recorded.

126. Contingency was made for specialist conservation advice from an appropriately qualified and experienced archaeological conservator should unexpected, unusual, or extremely fragile and delicate objects be recovered. All retained finds was processed in accordance with the CIfA 's Standard and Guidance for the collection, documentation, conservation and research of archaeological material (CIfA, 2020).

127. Recovered objects was selected, retained, or disposed of in accordance with the policy agreed with the institution receiving the archive, and in consultation with heritage stakeholders. Should ordnance be discovered, it was treated with extreme care as it may still be active. Guidelines on addressing UXO discoveries provided to contractors by the Applicant must be followed prior to any recording of items for archaeological purposes. Should a UXO be encountered within, or in proximity to an AEZs, advice was sought from heritage stakeholders prior to the implementation of any measures to address the UXO.

128. If human remains are identified, they was treated with due care and respect. For each situation, the following actions are to be undertaken, and, in any event, the retained archaeologist will inform the Applicant, who will immediately inform the Aberdeenshire Police, and the heritage stakeholders. If the Police do not propose to investigate the remains the relevant Procurator Fiscal was contacted by the Applicant.

129. Where practical, the human remains was left in-situ, covered, and protected. Where human remains have been found and are unavoidably disturbed, the remains was fully recorded, excavated, and removed from the site only once the appropriate licence has been obtained. An appropriate Human Skeletal Biologist will, if required, be available to advise on and assist with the recovery and storage of human remains. The excavation, recording, analysis and storage of any human remains was undertaken in line with the Guidelines to the Standards for Recording Human Remains (Mitchell and Brickley, 2017) and follow best practice as appropriate (Historic Scotland, 2006; BABAO 2010).

130. With regard to the remains of crashed aircraft, the majority of aircraft wrecks are military and so fall under the legal protection of the Protection of Military Remains Act 1986 and would have to be avoided without a licence. Any finds that are suspected of being military aircraft was reported immediately to the retained archaeologist. Should human remains be discovered, they will not be touched and was reported immediately to the MOD.

131. All archaeological artefacts that have come from a ship are 'wreck' for the purposes of the Merchant Shipping Act 1995. For all items of wreck that have been recovered, the Applicant, via their retained archaeologist or archaeological contractors, will ensure that the RoW is notified within 28 days of recovery.

132. All recovered materials was subject to a conservation assessment to determine whether special measures are required while the material is being held. This conservation assessment was carried out by the retained archaeologist or an archaeological contractor with an appropriate level of expertise, with advice from appropriate specialists.

133. The retained archaeologist or an archaeological contractor with appropriate expertise will implement recommendations arising from the conservation assessment. Where no special measures are recommended, finds was conserved, bagged, boxed and stored in accordance with industry guidelines.

10 Data Management, Reporting, Publication and Archiving

10.1 Method Statements

134. As noted above, the WSI provides a framework for archaeological investigations. Detailed archaeological method statements was produced prior to survey or construction work, to provide a detailed methodology for each package of development or survey works, as required. Each method statement was consistent with the WSI, applicable guidance and will reflect the recommended methodologies set out in The Crown Estate (2021) guidance. The objectives for each work package was set out in the method statement and will take account of applicable objectives from the relevant research frameworks (such as those listed in **Section 1.4**) that was addressed through the delivery of the work.

135. Each method statement was prepared on behalf of the Applicant by the retained archaeologist in consultation with heritage stakeholders and was issued by the Applicant to MD-LOT a minimum of six weeks prior to the work package commencing. The Applicant was responsible for ensuring that all surveys proceed in line with any planned method statement as agreed with heritage stakeholders and submitted to MD-LOT.

136. If the retained archaeologist does not have a sufficient level of experience to undertake archaeological work required for a specific works package, they will appoint a suitably qualified and experienced archaeological contractor to contribute to or prepare the document and undertake the work. Formal approval for each method statement was required from heritage stakeholders prior to works commencing and in accordance with agreed timescales.

137. As set out in The Crown Estate (2021) guidance, method statements will cover the following key matters, as relevant to each work package:

- Specific objectives of archaeological works;
- Extent of investigation;
- Investigation methodology, to cover:
  - Intrusive methods;
  - Non-intrusive methods;
  - Recording system; and
  - Finds, including the policy for selection, retention and disposal and provision for immediate conservation and storage.
- Environmental sampling strategy;
- Form of commission and contractual relationship with the project team;
- Relation between licence condition(s), WSI and the method statement;

- Context in terms of relevant construction works;
- Summary results of previous archaeological investigations in the vicinity;
- Archaeological potential;
- Anticipated post-investigation actions, including processing, assessment and analysis of finds and samples;
- Reporting, including Intellectual Property Rights in the report and associated data, confidentiality and timescale for deposition of the report in a publicly accessible archive;
- Timetable, to include investigation and post-investigation actions;
- Monitoring arrangements, including monitoring by heritage stakeholders; and
- Health, safety, and welfare.

10.2 Data Management

138. All data management will take place in accordance with the approaches set out in The Crown Estate (2021) guidance.

139. The retained archaeologist has overall responsibility for all matters related to archaeological data management. Issues regarding data storage and management, such as how long and in what format data should be stored, was confirmed through discussions between the retained archaeologist and the Applicant. Should a different retained archaeologist be appointed for different stages of a project, the Applicant will ensure that all relevant data is provided to the new retained archaeologist (e.g. shapefiles of AEZs, geophysical anomalies of archaeological potential, areas of high archaeological potential).

140. On completion of the Bellrock Wind Farm Infrastructure's construction phase, the retained archaeologist will produce an Online Access to the Index of Archaeological Investigations form for the whole scheme, and copies of all archaeological reports was attached. When the Online Access to the Index of Archaeological Investigations form is submitted notification was sent to heritage stakeholders, so that they may advise the respective competent authority on compliance with relevant consent conditions.

10.3 Reports

141. Each package of work outlined in the WSI will give rise to one or more archaeological reports, as set out in the method statement relating to the work. As outlined in each of the sections above, this will include reports prepared following the completion of:

- Archaeological assessments of marine geophysical data (see **Section 5.1**);
- Marine geoarchaeological assessments (see **Section 5.2**);
- Diver/ROV assessments (see **Sections 5.3** and **5.4**);

- Watching briefs (see **Section 5.4**, not currently anticipated to be required); and
- Any further work packages which may be required in the event of an unexpected discovery reported under the PAD (see **Section 6.3**) or in the event that avoidance of site is not possible and further investigation or mitigation (such as excavation) is required (see **Section 5.4**).

142. Each archaeological report was consistent with this WSI, and The Crown Estate (2021) guidance on reporting, and will demonstrate sufficient planning, recording and data management, with a commitment to archiving and the public dissemination of results. The report will satisfy the method statement for the investigation and will present the project information in sufficient detail to allow interpretation without recourse to the project archive.

143. Archaeological reports was prepared in accordance with the guidance given in the relevant CIfA's Standards and Guidance documents. Reports will typically include:

- A non-technical summary;
- The aims and methods of the work;
- The results of the work including finds and environmental remains;
- A statement of the potential of the results;
- Proposals for further analysis and publication; and
- Illustrations and appendices to support the report.

144. Each archaeological report was submitted in draft to the retained archaeologist for submission to the Applicant. If the report is prepared by the retained archaeologist, it was submitted directly to the Applicant. Draft archaeological reports was submitted by the Applicant to heritage stakeholders within six months of completion of each package of archaeological work. The timescales will ensure that heritage stakeholders have sufficient time to comment on findings prior to the next stage of archaeological work commencing.

145. On completion of archaeological works relating to construction of the scheme, including post-construction monitoring, an overarching report on the archaeology of the scheme was prepared in accordance with the methods set out above. The overarching report will serve as an index to, and summary of, the archaeological investigations as a whole. This final report was issued to MD-LOT by the Applicant within six months of completion of the archaeological assessment of post-construction monitoring.

10.4 Post-Fieldwork Assessment

146. Where required, provisions was made for post-fieldwork assessment. This will address where possible, the character, extent, date, integrity, state of preservation and relative quality of any archaeological features or remains that are recorded. Costs was provided for any further research, analysis, publication, and archiving.

147. Decisions regarding the scope of any post-fieldwork assessment was made by agreement between the Applicant and heritage stakeholders following submission of investigation reports, based on the possible importance of the results in terms of their contribution to archaeological knowledge, understanding or methodological development.

148. As set out in The Crown Estate (2021) guidance, as a minimum, a single assessment may be carried out after the archaeological work packages associated with Bellrock Wind Farm Infrastructure within the Bellrock WFDA have been completed. Such an assessment may be carried out by expanding the overarching archaeological report to include proposals in respect of analysis, publication, and archiving. An assessment of the potential of the archive for further analysis may include (but is not limited to):

- The dating and dendrochronological assessment of timbers;
- The conservation of appropriate materials, including the X-raying of metalwork;
- The spot-dating of all pottery from any investigation. This was corroborated by scanning of other categories of material;
- The preparation of site matrices with supporting lists of contexts by type, by spot-dated phase and by structural grouping supported by appropriate scaled plans;
- An assessment statement was prepared for each category of material, including reference to quantity, provenance, range and variety, condition and existence of other primary sources; and
- A statement of potential for each material category and for the data set as a whole was prepared, including specific questions that can be answered and the potential value of the data to local, regional and national investigation priorities.

10.5 Analysis and Publication

149. Based on recommendations made by the post-fieldwork assessment, and as agreed by the relevant heritage stakeholders, mitigation requirements was satisfied by carrying out analysis and reporting of the post-fieldwork assessment. If appropriate, this may include publication of important results in a recognised peer-reviewed journal or as a monograph. The retained archaeologist would confirm the timeframe for the distribution and/or publishing of reports, in consultation with the Applicant, MD-LOT and heritage stakeholders, and this would be included in the relevant method statement.

10.6 Archive

150. It is accepted practice to keep project archives, including written, drawn, photographic and artefactual elements (together with a summary of the contents of the archive) together wherever possible and to deposit them in appropriate receiving institutions once their contents are in the public domain.

151. Archives was developed in line with guidance including:

- Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives (CIfA 2014c);
- Environmental Guidelines for the Permanent Storage of Excavated Material from Archaeological Sites (Institute of Conservation 1984); and
- Guidelines for the preparation of excavation archives for long-term storage (Walker, 1990).

152. The relevant heritage stakeholders and the archaeological contractor will agree with the receiving institution a policy for the selection, retention and disposal of excavated material. They will confirm requirements in respect of the format, presentation and packaging of archive records and materials, and will notify the receiving institution in advance of any fieldwork.

153. The timetable for depositing archives with the receiving institution after completion of the post-fieldwork programme was agreed based on a method statement prepared for the Applicant by the retained archaeologist following fieldwork. For Scotland, Historic Environment Scotland is the repository for all fieldwork records generated during archaeological fieldwork.

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Appendix A: Figures

Figure A.1: Marine Archaeology and Cultural Heritage Study Area

Figure A.2a: Seabed Features (All)

Figure A.2b: Seabed Features (Low Archaeological Potential)

Figure A.2c: Seabed Features (Medium Archaeological Potential)

Figure A.2d: Seabed Features (High Archaeological Potential)

Figure A.3: Magnetic Anomalies

Figure A.4: Archaeological Exclusion Zones

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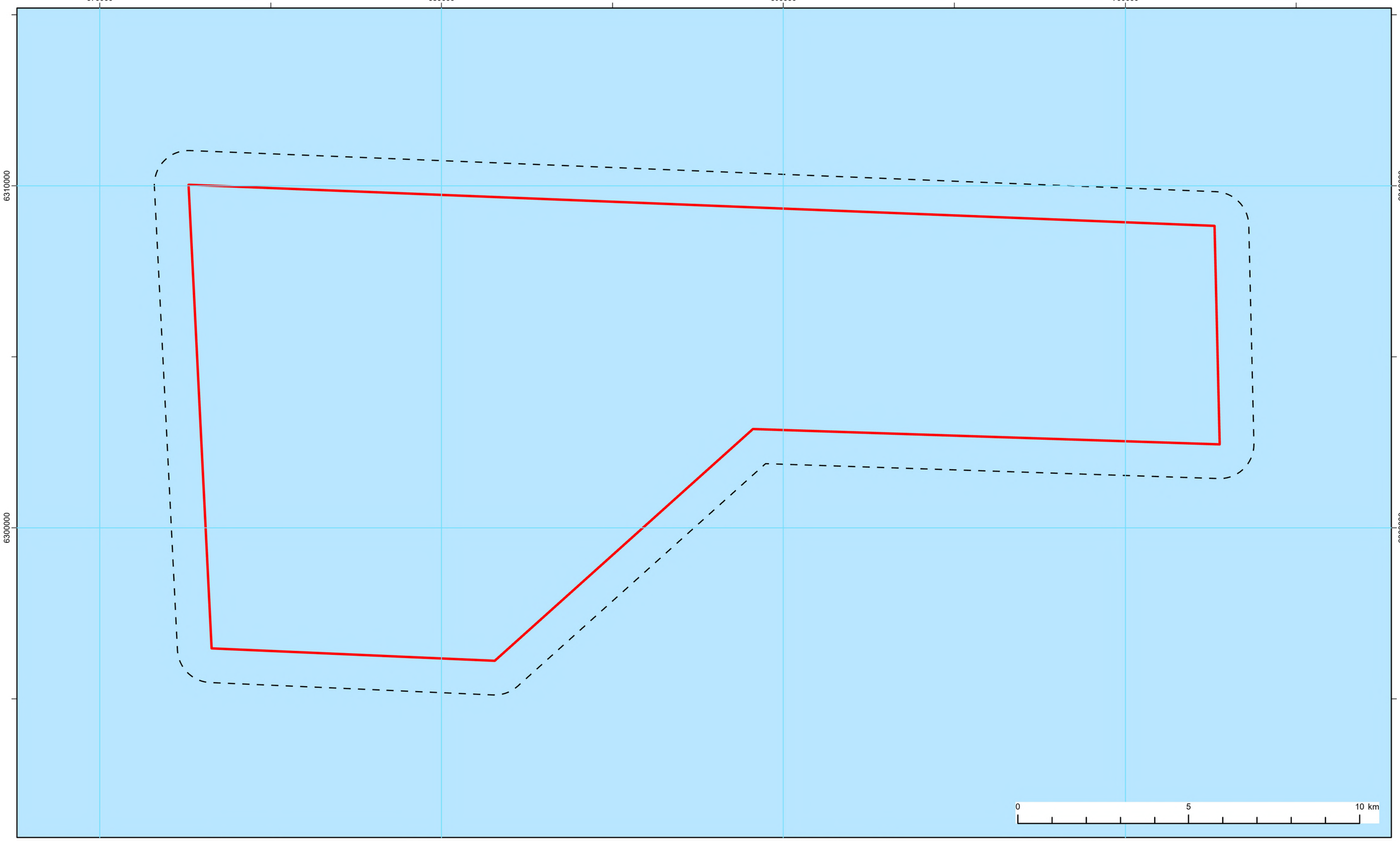

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Legend:
- Marine Archaeology and Cultural Heritage Study Area
- Bellrock Wind Farm Development Area

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

Coordinate System: WGS 1984 UTM Zone 30N

Source:
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Scale @ A3
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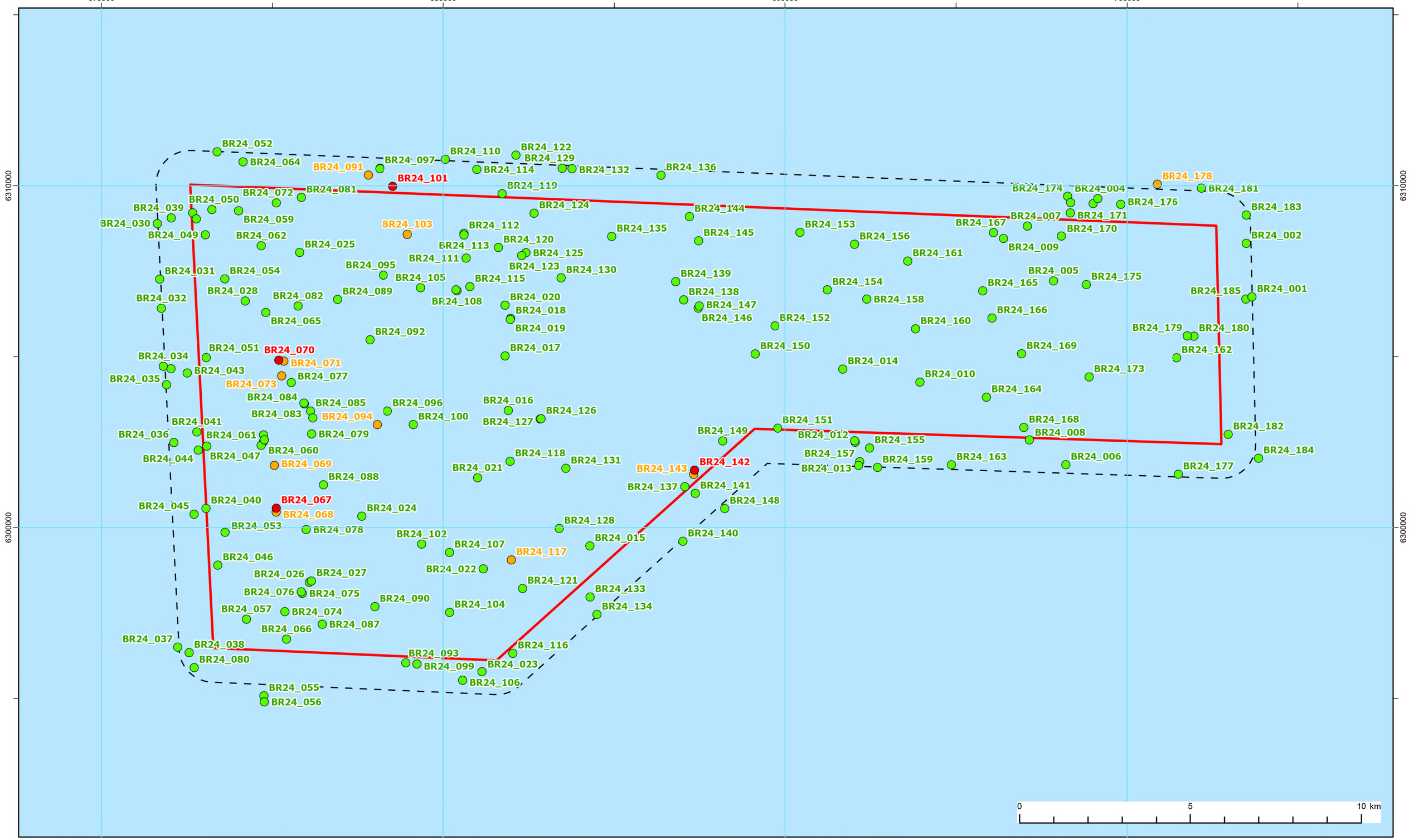
Figure Title:
Marine Archaeology and Cultural Heritage Study Area

Project:
Bellrock Wind Farm Development Area (WFDA)

Report:
Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_130

Figure A.1



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Legend:
- Bellrock Wind Farm Development Area
- Marine Archaeology and Cultural Heritage Study Area (1 km Buffer)

Archaeological Anomalies

Potential
- Low
- Medium
- High

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

Coordinate System: WGS 1984 UTM Zone 30N

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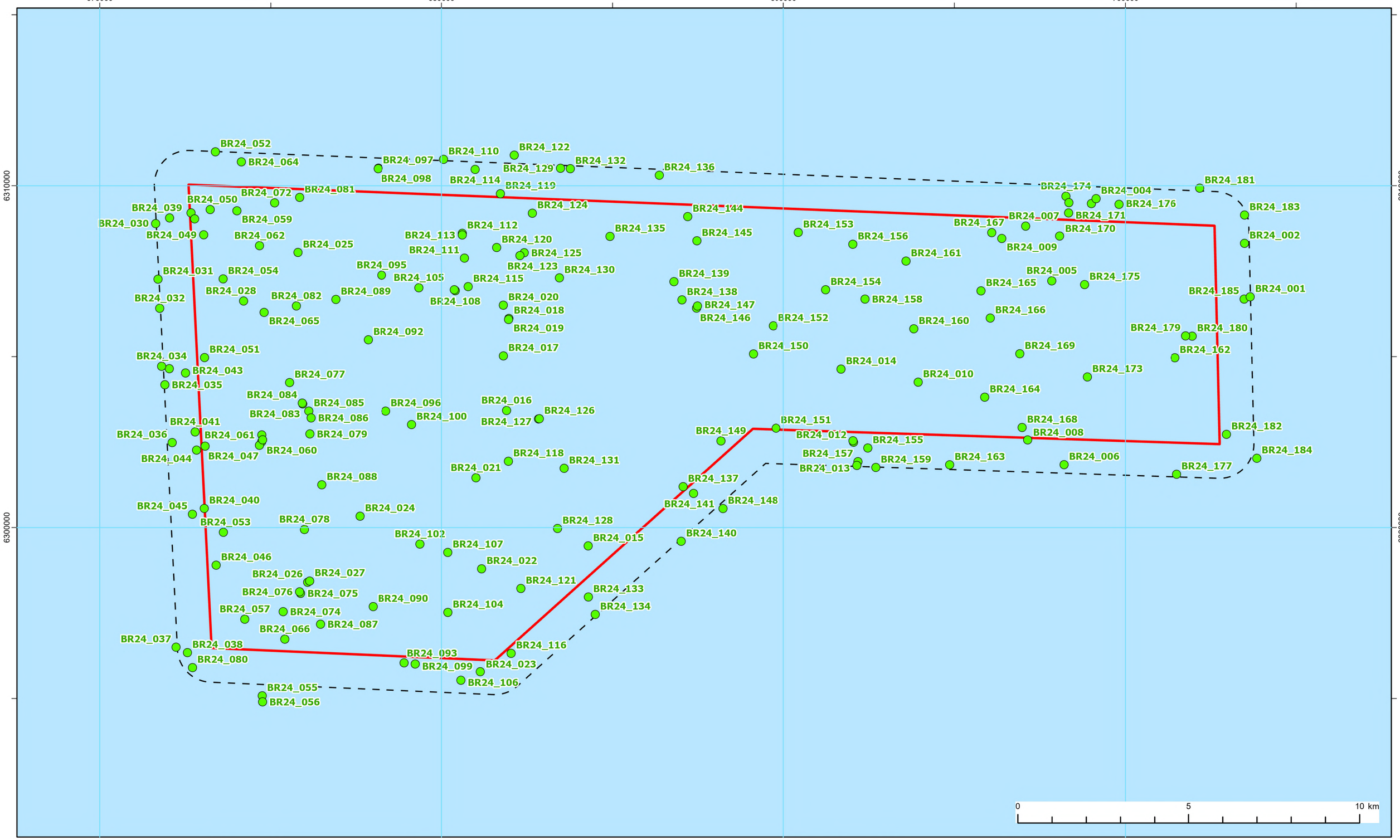
Figure Title:
Seabed Features (All)

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_131

Figure A.2a



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Legend:
- Bellrock Wind Farm Development Area
- Marine Archaeology and Cultural Heritage Study Area (1 km Buffer)

Archaeological Anomalies

Potential
- Low

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

Coordinate System: WGS 1984 UTM Zone 30N

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Figure Title:
Seabed Features (Low Archaeological Potential)

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_132

Figure A.2b

670000
680000
690000
700000
6310000
6300000

BR24_091
BR24_178
BR24_103
BR24_071
BR24_073
BR24_094
BR24_069
BR24_143
BR24_068
BR24_117

0
5
10 km

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Legend:
- Bellrock Wind Farm Development Area
- Marine Archaeology and Cultural Heritage Study Area (1 km buffer)

Archaeological Anomalies

Potential
- Medium

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

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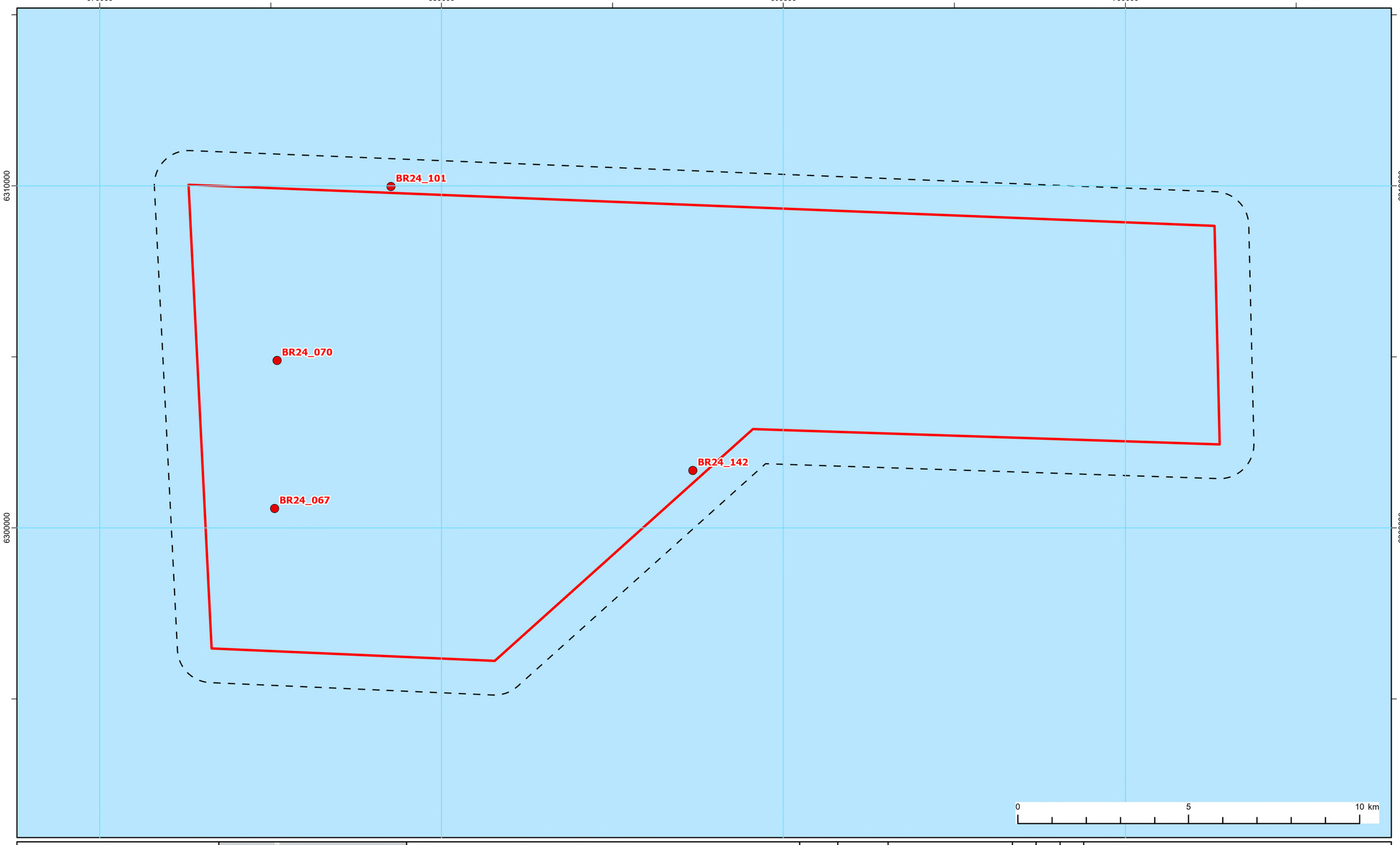
Figure Title:
Seabed Features (Medium Archaeological Potential)

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_133

Figure A.2c



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Legend:

Bellrock Wind Farm Development Area

Marine Archaeology and Cultural Heritage Study Area (1 km Buffer)

Archaeological Anomalies

Potential

High

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

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Figure Title:

Seabed Features (High Archaeological Potential)

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_134

Figure A.2d

670000 680000 690000 700000

6310000

6300000

BR24_M_190

BR24_M_200

BR24_M_201

BR24_M_197

BR24_M_202

0 5 10 km

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Legend:

Bellrock Wind Farm Development Area

Marine Archaeology and Cultural Heritage Study Area (1 km Buffer)

Magnetic Anomalies

Amplitude

- 5 to 50
- 50 to 100
- 200+

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

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Scale @ A3
1:100,000

Figure Title:

Magnetic Anomalies

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_135

Figure A.3

675000
680000
685000
690000
6305000
6300000

BR24_103
0 50 100 150 200 m

BR24_069
0 50 100 150 200 m

BR24_067
0 50 100 150 200 m

BR24_094
0 50 100 150 200 m

BR24_117
0 50 100 150 200 m

BR24_070

BR24_071

BR24_073
0 50 100 150 200 m

BR24_142
0 200 m

0 1 2 3 4 5 km

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North Sea
Edinburgh

Legend:
- Bellrock Wind Farm Development Area
- Marine Archaeology and Cultural Heritage Study Area (1 km Buffer)
- Seabed Feature Extents

Archaeological Exclusion Zones

Potential
- Medium
- High

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

Coordinate System: WGS 1984 UTM Zone 30N

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Scale @ A3
1:50,000

Figure Title:
Archaeological Exclusion Zones

Project:
Bellrock Wind Farm Development Area (WFDA)

Report:
Written Scheme of Investigations and Protocol of Archaeological Discoveries

Drawing No.: RHDV_BEL_CST_REP_0003_136

Figure A.4

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