8. SCHEDULE OF MITIGATION

This chapter collates the mitigation measures and environmental management commitments which are proposed in each of the technical chapters (**Chapters 4 to 7**) of this Environmental Appraisal (EA) into a single schedule, which is presented in **Table 8.1** below. Measures to mitigate construction and operational phase impacts are included. Measures to mitigate effects arising apply to all elements of the Proposed Development unless otherwise specified.

Some mitigation measures would serve to avoid effects, others would reduce or off-set them. Environmental effects and associated mitigation measures are presented in the order in which they appear within this EA report.

Mitigation measures that are 'by design', i.e., have been incorporated into the final design as reflected on the application drawings provided for the Proposed Development, are not included here as they form part of the Proposed Development described in **Chapter 3: Proposed Development and Alternatives**.

The pre-construction and construction phase mitigation would be delivered through the site-specific Construction Environmental Management Plans (CEMPs). The outline content of the proposed CEMPs is provided in the Outline CEMP and supporting SSEN Transmission General Environmental Management Plans (GEMPs) and Species Protection Plans (SPPs) (**Technical Annex (TA) 3.2, Volume 2**). Further detail on specific mitigation measures to be included in the CEMP is contained in each of the technical chapters (**Chapters 4 to 7**), where relevant. Whilst it is considered standard practice to undertake works in accordance with a CEMP, the specific measures from the CEMP, GEMPs and SPPs identified for the Proposed Development have been set out in **Table 8.1** as they have been relied upon for the purpose of the technical appraisals. As set out in the Outline CEMP, toolbox talks would be prepared by the Principal Contractor(s) and given to operational teams prior to the commencement of works and would cover the measures specific to the Proposed Development, as outlined in **Table 8.1**.

Table 8.1: Schedule of Mitigation

Ref.	Identified Impact	Mitigation Measure	Responsibility	Timing of Mitigation Measure
Ecology and Ornithology (Chapter 4)				
EO1	Permanent and temporary loss or degradation of terrestrial and/or aquatic habitat either directly as a result of (e.g.) excavation, compaction, or modification (such as vegetation and tree removal or covering), or indirectly as a result of (e.g.) dewatering, or from the accidental release of fuels, lubricants or other chemicals.	Existing, or temporary, access tracks (e.g. such as floated access tracks/bog mats) would be used as far as possible and the extent of construction work would be minimised within marshy grassland habitat. Areas of marshy grassland, especially the area of M23, would be avoided, where possible. If not possible, floated access tracks/bog mats and low ground-pressure vehicles would be used to cross this habitat. Although coniferous woodland plantation is not included as a sensitive habitat for the purposes of this assessment, the area removed for tree felling will be replaced in line with the Scottish Government's Control of Woodland Removal Policy (CoWRP[1]), to meet Compensatory Planting requirements and to ensure no net loss of biodiversity. Ideally, a net gain should be achieved through the additional planting of native tree species (**TA 2.1 and 7.4, Volume 2**).	Principal Contractor / Forestry Contractor Monitored by the Ecological/Environmental Clerk of Works (EcoW)	During and immediately after construction

[1] Scottish Government's CoWRP (2019), URL: https://forestry.gov.scot/publications/support-and-regulations/control-of-woodland-removal

Table 8.1: Schedule of Mitigation

		Once construction works are complete, habitats would be reinstated as soon as possible in areas of temporary access. All peat would be re-used in line with the Outline Peatland Management Plan (OPMP) (**TA 7.2, Volume 2**), with the principle aim of retaining and re-using peat as close as possible to the point of extraction.		
EO2	Disturbance from construction lighting, noise and excavations or from felling activities.	Works would be completed following the Applicant's Species Protection Plans (SPPs) and General Environmental Management Plans (GEMPs) in line with the Construction Environmental Management Plan (CEMP) An outline CEMP is included in **TA 3.2 (Volume 2).** Pre-construction protected species surveys would be undertaken. If the results indicate the presence of a protected species, an assessment of the potential impacts on the species would be completed and appropriate mitigation measures identified (if required), such as micro-siting of infrastructure. A suitably qualifed EcoW would input into the CEMP and complete ongoing monitoring of protected species and protection measures for protected species through the construction stage and during the felling works, where required.	Principal Contractor/Forestry Contractor Ecologist/ECoW	No more than three months prior to construction Through the construction phase

Table 8.1: Schedule of Mitigation				
EO**3**	Pollution from (e.g.) oil spill, siltation of watercourses or from construction dust	The site-specific CEMP would include best practice measures on pollution prevention and mitigation (see **TA 3.2, Volume 2**), and would follow Scottish Environment Protection Agency (SEPA) Guidance for Pollution Prevention (GPP[2]), The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended)[3] and relevant construction and Construction Industry Research and Information Association (CIRIA) guidance[4]. Standard pollution prevention guidelines would include measures such as silt fencing and traps, storage/bunding of equipment, material and chemicals at appropriate distances from watercourses, and supervision by an ECoW. Specific mitigation regarding peat to minimise impacts on watercourses has been included within the OPMP (**TA 7.2, Volume** 2).	Principal Contractor and Forestry Contractor will be required to produce their respective CEMP's. **Monitored by the ECoW**	During the forestry and construction phase
EO4	Destruction of bird nests and disturbance of breeding birds (including Schedule 1 species[5]). The loss of coniferous woodland plantation would remove some suitable nesting habitat for bird species. If the vegetation removal were to	Works would be completed with consideration of sensitive seasons for IEOFs. The removal of vegetation, including tree felling works, should be undertaken outside key periods (i.e., the bird breeding season of March to August, inclusive).	Principal Contractor/Forestry Contractor Monitored by ECoW	Undertaken no more than three days prior to felling.

[2] Works and Maintenance in or Near Water: GPP 5 (2018), URL: https://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf?utm_source=website&utm_medium=social&utm_campaign=GPP5%2027112017

[3] The Water Environment (Controlled Activities) (Scotland) Regulations (2011), URL: https://www.legislation.gov.uk/ssi/2011/209

[4] CIRIA guidance (2022), URL: https://www.ciria.org/ci/Civil_infrastructure/CIRIA_guidance.aspx

[5] The Wildlife and Countryside Act (as amended) (1982), URL: http://www.legislation.gov.uk/ukpga/1981/69

Table 8.1: Schedule of Mitigation

	take place during the breeding season, it is possible, though unlikely, that nests would be damaged or destroyed during the process.	Where this is not possible, an ECoW would carry out nesting bird checks prior to felling. If nesting birds are present, a suitable buffer zone would be implemented around the nest, with no work in this zone until the young have fledged or the nest is no longer in use. The EcoW would be responsible for the watching brief and protection measures for breeding birds through the forestry/construction stage, as set out in the Applicant's SPPs and in the CEMP.		
EO5	Pollution (e.g. oil spill) from vehicles accessing the Proposed Development for maintenance activities.	Operations staff would implement their own Risk Assessment and Method Statement (RAMS) to identify and manage environmental risks from their work, such as oil spills.	The Applicant, Operations team	During the operational phase
EO6	Disturbance and displacement due to maintenance activities and presence of on-site personnel, including light disturbance from operational lighting.	Unlikely to be required as disturbance would be at a very low level, with vehicles utilising existing access roads. Any operational lighting used would be designed to avoid any light spill onto the adjacent watercourse (River Aray) to prevent impacts on water vole.	The Applicant, Operations team	
Landscape and Visual (Chapter 5)				
LV1	Diversion with 8 wood poles of 16 m in height south of the existing OHL that would be in place for 18 months – temporary trackways, bogs along a length of 743 m and removal of 2.4 ha of commercial forestry	Removal of all temporary tracks and worksites, as soon as possible after the construction is complete and the temporary infrastructure is no longer needed. Revegetation of any bare earth exposed during construction.	Principal Contractor	Construction

Table 8.1: Schedule of Mitigation				
		Works to be undertaken in daytime hours, if lighting is required, it would be located and directed to avoid sensitive receptors[6]. Forestry Felling and Construction activities undertaken in accordance with approved Construction and Environmental Management Plan (CEMP) and the Woodland Report (**TA 2.1, Volume 2**)) Compensatory Planting would be provided (refer to **TA 2.1, Volume 2** for further details to ensure no net loss).		
LV2	Construction of a new section of permanent access track 700 m long and 3.5 m wide. Upgrades to 495 m of existing access track requiring excavation and construction works.	Works delivered in accordance with approved CEMP and the Woodland Report (**TA 2.1, Volume 2**).	Principal Contractor	Construction
LV3	Construction of tower foundations (method to be confirmed based on ground conditions). Likely to require 20 tonne excavator, 14 tonne piling rig and supply of cement. Tower foundations and associated construction activities would require a working area of approximately 6,400 m^2 (80 m x 80 m) for angle and terminal towers. Each tower anticipated to take five days for construction with a crane.	No more than two excavations open at any time. Each foundation would take 4 weeks. Excavation area would be backfilled using original excavated material where possible. Works delivered in accordance with approved CEMP. An Outline CEMP is located in **Volume 2, TA 3.2.**	Principal Contractor	Construction
LV4	Two new Terminal Towers (35B and 36B installed (approximately 141 m and 115 m away	Access tracks will be constructed in accordance with the Forestry Commission guidance on Forest	Principal Contractor / Asset owner	Operation

[6] Guidance Note 1 for the reduction of obtrusive light (2021) available at: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

Table 8.1: Schedule of Mitigation

	from the existing 132 kV Inveraray to Taynuilt OHL), extending up to approximately 29 m (T35B) and 31 m (T36B) in height. Replacement of existing Tower 36A (19.9 m tall) with an angle tower, extending up to 38.4 m tall[7]. Existing Tower 35A, which is 25.7 m tall, would be replaced with an angle tower, extending up to approximately 28.4 m[8]. Creation of a new section of overhead line between angle tower 35A and 35B (approximately 170 m) to terminal tower 36AB and 36B (approximately 137 m), and downleads to substation gantry. Creation of approximately 700 m new permanent access track and upgrades to approximately 495 m of existing access track (between B–C in Figure 3.1b) connecting to the access track to be upgraded for the proposed Creag Dhubh Substation (between A–B in **Figure 3.1b, Volume 3a**).	Roads and Access Tracks[9] and guidance provided by NatureScot on Constructed Tracks in the Scottish Uplands to select a design that is sympathetic to the surrounding landscape. Works delivered in accordance with approved CEMP and the Woodland Report (**TA 2.1, Volume 2)**		

[7] Given the proposed replacement tower would result in a height increase of greater than 20% when compared to the existing tower, the works cannot be undertaken subject to The Overhead Lines (Exemptions) (Scotland) Regulations 2013. Accordingly, the proposed replacement tower will be included within the s37 application.

[8] The LOD for the proposed new angle tower would not exceed 20% of the existing height. Therefore, these works are exempt from the s37 consent application and would be completed under The Overhead Lines (Exemptions) (Scotland) Regulations 2013. A s37 application would be needed should the tower height exceed 30.84 m.

[9] Forestry Commission. Forest Roads and Tracks. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721055/ON025-ForestRoadsandTracksv1.0issued110809__1_.pdf

Table 8.1: Schedule of Mitigation

Cultural Heritage and Archaeology (Chapter 6)				
CH1	Negligible magnitude impact on setting of Scheduled Monuments.	No additional mitigation required see **TA 6.1 and TA 6.2, Volume 2**	N/A	N/A
CH2	Negligible magnitude impact on setting of NSR Site.	No additional mitigation required see **TA 6.1 and TA 6.2, Volume 2**	N/A	N/A
CH3	Low magnitude impact on setting of non-designated asset.	No additional mitigation required see **TA 6.1 and TA 6.2, Volume 2**	N/A	N/A
Hydrology and Hydrogeology (Chapter 7)				
HG1	Impacts to the quality of surface waters through: Release of sediment or pollutants generated during excavation, earth moving (including peat) and from temporary stockpiles. Accidental spills or release of pollutants to watercourses or the ground. Accidental discharge of untreated foul sewage from temporary welfare facilities to watercourses or to the ground.	No additional mitigation is required beyond the standard measures and embedded mitigation stated in **Chapter 3: Proposed Development and Alternatives (Volume 1)**, and summarised as follows: A limited area of the northern extent of the proposed permanent access is approximately 15m from An Aodann watercourse and the use of silt fencing in this area would provide additional protection from the potential release of sediments. A site-specific Construction Environmental Management Plan (CEMP, based on the Outline CEMP presented in **TA 3.2, Volume 2**) would be written in accordance with the relevant best practice guidance on pollution prevention and mitigation. Namely, SEPA Guidance for Pollution Prevention (GPP[10]), The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended), Version 8.2 February 2018, and	Principal Contractor	Forestry Operations and Construction

[10] SEPA GPP: Works and maintenance in or near water: GPP 5. Version 1.2. February 2017. https://www.netregs.org.uk/media/1417/gpp-5-works-and-maintenance-in-or-near-water.pdf?utm_source=website&utm_medium=social&utm_campaign=GPP5%2027112017

Table 8.1: Schedule of Mitigation

		relevant construction and CIRIA guidance. The CEMP would set out the environmental management requirements and responsibilities incumbent upon the appointed Contractor. All equipment, material and chemicals would be securely stored and bunded at least 50 m from watercourses. An ECoW would audit storage areas during installation, as well as undertake regular checks. Specific mitigation regarding peat to minimise impacts on watercourses have been included within the Draft Peat Management Plan (PMP) (**TA 7.2, Volume 2**). The temporary diversion poles would be removed following completion of the construction works and excavations backfilled to match current baseline conditions.		
HG2	Increased volumes and rates of surface runoff, and preferential routeing of surface water flows due to an increase in impermeable surface areas within the Site boundary; discharge of any required dewatering activities; and surface water drainage measures for access tracks	No additional mitigation is required beyond the standard measures and embedded mitigation stated in **Chapter 3: Proposed Development and Alternatives (Volume 1)**, and summarised as follows: Track drainage measures for the management of surface water runoff would be designed to minimise potential changes to the volume and rate of surface water runoff, such that it is limited to the pre-development greenfield rates in order to mimic the natural regime at this location whilst taking account of potential changes in rainfall as a result of climate change. Dewatering shall be carried out in accordance with the CEMP and SSEN	Principal Contractor	Forestry Operations / Construction

Table 8.1: Schedule of Mitigation

		Transmission's GEMPs (**TA 3.2: Outline CEMP, Volume 2**). Dewatering of excavations must take place away from watercourses and silt-entrapment measures be used prior to discharge such that the magnitude of any impacts due to the dewatering of excavations would be minor on downstream receptors. Detailed drainage plans would be designed by the Contractor at later design stages and be detailed in the CEMP.		
HG3	Impacts on morphology and sediment supply in watercourses as a result of excavations near surface water features.	No additional mitigation is required beyond the standard measures and embedded mitigation stated in **Chapter 3: Proposed Development and Alternatives (Volume 1)**, and summarised as follows: Any works taking place near watercourses would be undertaken in accordance with SEPA guidance and in line with the requirements of the Water Environment (Controlled Activities) (Scotland) Regulations[11] (CAR) to prevent or reduce adverse effects to the watercourse. Works would also be carried out in line with the final CEMP to be drafted by the Contractor and under the terms of the Construction Run-off Permit (CRP).	Principal Contractor	Construction
HG4	Localised modification of groundwater flows and the formation of preferential flow path for sub-surface flows, or sub-surface draw down due to excavations and dewatering for footings.	No additional mitigation is required beyond the standard measures and embedded mitigation stated in **Chapter 3: Proposed Development and Alternatives (Volume 1)**, and summarised as follows:	Principal Contractor	Construction

[11] Secretary of State, 2011. The Water Environment (Controlled Activities) (Scotland) regulations 2011

Table 8.1: Schedule of Mitigation

		Implementation of dewatering control and distribution of surface water flows during construction; ensuring dewatering would be carried out in accordance with the CAR, as well as the CEMP (**TA 3.2: Outline CEMP, Volume 2**) and under the terms of the SEPA Construction Run-off Permit (CRP).		
HG5	Impacts to GWDTEs through the alteration of surface water and groundwater flows	Potential GWDTE habitats identified through NVC surveying are not considered to be groundwater dependent (Figure 7.3. Volume 3a). Therefore, no additional mitigation is required beyond the standard measures and embedded mitigation stated in **Chapter 3: Proposed Development and Alternatives (Volume 1)**.	Principal Contractor	Construction
HG6	Potential for impacts on downstream receptors as a result of forestry felling: • Shellfish Waters Protected Areas •	No additional mitigation is required, out with the standard measures stated within the CEMP. An Outline CEMP is located in **Volume 2, TA 3.2**	Principal Contractor	Construction
HG7	Impacts to peat arising from the excavation and disturbance of peat from construction activities Changes to local soils and peat habitats could occur as a result of: • Compaction of soils; • Potential for increased erosion of peat soils through disturbance, either through direct disturbance or localised drying caused by infrastructure; • Changes in soil hydrology; • Potential for peat slide caused by the construction of infrastucture which could	As discussed in **Chapter 3: Proposed Development and Alternatives (Volume 1**), the siting of the Proposed Development is defined by the location of the existing OHL and the position of the proposed Creag Dhubh substation. Measures have been undertaken to avoid has taken into account the presence of peat and carbon rich soils through the design process. This has included siting infrastructure to avoid areas of deep peat (where practicable) and also utilising existing tracks and construction methods to minimise disturbance of peat, and where this is not possible micrositing will be undertaken locally. although this	Principal Contractor	Construction

Table 8.1: Schedule of Mitigation

	affect human and environmental receptors; and • Loss of peatland habitats and carbon rich soils through excavations for infrastructure	has been undertaken in conjunction with the other environment and technical constraints. An Outline PMP (**TA 7.2, Volume 2**) has been prepared for the Proposed Development which documents outline measures to mitigate potential impacts on peat and carbon rich soils through the construction phase. This is a live document that would be updated further as the project progresses through detailed design and operation. The PMP would seek to ensure that any impacts on peat and carbon rich soils are reduced particularly with regard to any areas of deeper peat. As the Proposed Development would result in the generation of approximately 22,275 m3 of excavated peat, mitigation would be required to minimise surplus peat. This would be undertaken by reusing peat to dress the shoulders and slopes of new access track and reinstate working areas used for the installation of towers. Peat would also be re-used for potential re-wetting/ditch blocking in the forestry areas if required. A Peat Landslide Hazard Risk Assessment (PLHRA) (**TA 7.3, Volume 2**) has been prepared which outlines the potential risks of the Proposed Development resulting in peat landslides as a result of construction activities. No risks have been identified and therefore no specific mitigation is required. A Peat Landslide Hazard Risk Assessment (PLHRA) (**TA 7.3, Volume 2**) has been prepared which outlines the potential risks of the Proposed Development resulting in peat landslides as a result of construction activities. No		

Table 8.1: Schedule of Mitigation

		risks have been identified and therefore no specific mitigation is required.		
HG8	Diversion or impoundment of natural surface water or near surface water flows due to access track construction	Cross drains will be installed at regular intervals along trackside drainage. Cross drains will be installed as pipe culverts under the track surface. The frequency of cross drains should increase in areas where higher flows are anticipated such as in areas of high surface flow (e.g. flushes or low-lying areas); where bank seepages are noted; and where historical or active drains are intercepted. Implementation of drainage measures as outlined in the CEMP. Geotechnical investigation shall be conducted to confirm the design and type of each tower to be installed. Where tower positions cannot be microsited to avoid sensitive habitats due to technical or operational restrictions, the option of a piled foundation would be considered to minimise the potential for adverse effects, particularly where peat is encountered at over 2 m depth.	Principal Contractor	Construction
HG9	Increased rates of surface water runoff and preferential routeing of surface water flows due to an increase in impermeable surface area and surface water drainage measures for access tracks.	access track drainage would be required to ensure that it remains fit-for-purpose. This would be secured through the implementation of the Operational Management Plan to be produced for the Proposed Development upon completion of construction. No additional mitigation measures are proposed.	Applicant	Operation
HG10	**Impacts to water quality**, such as from leakage of fuels from maintenance plant.	Access track drainage features would provide the required mitigation to prevent any increase in the sediment load of surface water runoff. Occasional maintenance works shall be carried out in line with SSEN Transmission's GEMPs and no plant	Applicant	Operation

Table 8.1: Schedule of Mitigation				
		laydown or storage of oils/fuels carried out during maintenance. Accordingly, no additional mitigation is proposed.		