COIRE GLAS OVERHEAD LINE GRID CONNECTION

Technical Appendix 10.1
Peat Management Plan (PMP)

Prepared for: Scottish & Southern Electricity Networks Transmission (SSEN Transmission)



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1.0 Introduction

This Stage 1 Peat Management Plan (PMP) has been prepared by SLR Consulting Ltd and forms a Technical Appendix to Chapter 10: Geology, Soils and Water of the Environmental Impact Assessment (EIA) Report, for the proposed 400kV overhead line (OHL) between proposed the Coire Glas Switching Station and Fort Augustus Substation (via the proposed Loch Lundie Substation) and ancillary works (the Proposed Development), which forms part of the wider Coire Glas Grid Connection Project.

Specifically, this Technical Appendix considers the requirements of Policy 5 (Soils) of National Planning Policy 4 (NPF4)¹ "to protect carbon rich soils, restore peatlands and minimise the disturbance of soils from development".

1.1 Scope of Assessment

A comprehensive programme of soils and peat depth probing has been completed to inform the routing and alignment stages of the development design. This data, engineering, technical and environmental constraints were then considered together and used to determine the alignment and access tracks which from the Proposed Development. Where required additional peat depth probing was undertaken to ensure peat depths and condition was well characterised and has formed the basis for this assessment.

This document uses this information and provides indicative volumes for peat extraction and outlines recommendations for the handling, re-use and storage of peat during construction and operation of the Proposed Development. The peat volumes and re-use / storage proposals would be further developed as part of the detailed site design.

The assessment is based on the description of the Proposed Development provided in Chapter 3: Project Description of the EIA Report.

Areas of the Proposed Development where soils are less than 0.5 m thick are considered to be too thin to be classified as peat and are therefore classified as soils. Areas of the Proposed Development and which have been proven to have soil depths of <0.5 m are not considered within the PMP.

This Stage 1 PMP will be further developed during the detailed design process and will form part of the appointed Principal Contractor's Construction Environmental Management Plan (CEMP) for the Proposed Development.

1.2 Study Approach

1.2.1 Desk Study and Data Sources

An initial desktop assessment was undertaken to establish the presence of peat forming habitats along the Proposed Development.

Scottish Government (2023). https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2022/11/national-planning-framework-4-revised-draft/documents/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4-revised-draft.pdf [accessed March 2023]



This desktop assessment used data presented on the SNH Carbon and Peatland Map² and British Geological Survey (BGS), Ordnance Survey (OS) and Digital Terrain Model (DTM) mapping for the initial study corridor and routes. Much of the study area has been subject to previous review and assessment and those which have been reviewed and been used to inform characterisation of the baseline conditions include the following:

- Coire Glas Pump Storage Hydro Scheme (Original³ and Revised⁴ Scheme) EIAs;
- Bhlaraidh Wind Farm OHL⁵ Environmental Appraisal; and
- Skye Reinforcement Project⁶ EIA Report.

Baseline data with respect to geology and soils has also been collected from publicly available information and open-source data from a range of sources, including:

- NatureScot Environment map viewer⁷;
- British Geological Survey (BGS) Geoindex mapping⁸;
- NatureScot SiteLink⁹;
- The Coal Authority Interactive Map¹⁰; and
- Zetica UXO Risk Maps¹¹.

1.2.2 Fieldwork

Peat depth data from the studies above was supplemented by detailed site visits and walkover surveys which were undertaken by SLR on the following dates:

- May 2022 initial reconnaissance visits of the study corridor and route options to collect peat depth and condition data; and
- February 2023 refined surveys to supplement existing peat probing information.

The field work has been undertaken to determine the thickness of peat along the proposed OHL alignment (including the proposed Limit of Deviation) and included the proposed steel lattice tower locations and proposed new permanent access tracks. The probing was undertaken at approximately 50 m intervals with targeted probing at infrastructure locations and locations of permanent access track. Where deep peat was proven the probing intensity was increased.

Probing was also undertaken along the two existing 132 kV OHL alignments (the 132 kV Fort Augustus to Fort William OHL and Existing 132kV Invergarry Tee OHL) that would be rerouted into the proposed Loch Lundie Substation. At the time of peat probing the final location of the proposed tower locations were not available. As

¹¹ Zetica UXO (2022), available at: https://zeticauxo.com/downloads-and-resources/risk-maps/ [Accessed March 2023]



² SNH and JHI (2016) Carbon and Peatland 2016 map, URL: http://soils.environment.gov.scot/maps/carbon-and-peatland-2016-map/#technicalAndReferenceMateria [Accessed March 2023]

³ Planning Application ECU0003164

⁴ Planning Application ECU00000577

⁵ Planning Application ECU00004639

⁶ Planning Application ECU000043395

⁷ NatureScot, (2016) Carbon and Peatland 2016 map. Available from: http://map.environment.gov.scot/soil_maps/ Scottish Government, 2016 [Accessed March 2023]

⁸ British Geological Survey (BGS) Online Viewer/Geoindex website, available at: http://mapapps.bgs.ac.uk/geologyofbritain/home.html; http://www.bgs.ac.uk/geoindex / [Accessed March 2023]

⁹ NatureScot SiteLink, available at: https://sitelink.nature.scot/about [Accessed March 2023]

¹⁰ Coal Authority (2022), available at: https://mapapps2.bgs.ac.uk/coalauthority/home.html [Accessed March 2023]

part of the Stage 2 peat management plan (which is prepared as part of the detailed design stage of the project) additional peat probing data will likely be required and this can be used to update this assessment.

The field campaign also allowed the report authors to:

- verify the information collected during the desk and baseline study;
- undertake a visual assessment of the ground conditions and main geological features;
- inspect rock exposures and establish by probing, an estimate of overburden thicknesses, peat depth and stability;
- confirm underlying substrate, based on the type of refusal of a peat probe as well as visual inspection of drainage features, exposures; and
- allow appreciation of gradients, access routes, ground conditions, etc., and to assess the relative location of all the components of the Proposed Development.

The desk study and field surveys have been used to identify potential development constraints and have been used as part of the iterative design process.

Chapter 10: Geology, Soils and Water of the EIA Report presents a detailed description of the soils and geology. With reference to the occurrence and distribution of peat, published it is reported therein that:

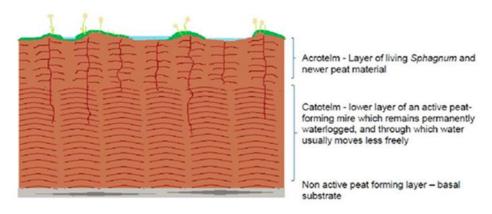
- the BGS indicate that the superficial deposits, where present, are dominated by hummocky glacial deposits (diamicton, sand and gravel) with small, localised areas of peat;
- soil mapping shows that the soils beneath the Proposed Development comprise peaty podzols, peaty gleys and brown earth soils with humus-iron podzols; and
- priority peatland mapping^{Error! Bookmark not defined.} indicates that the majority of the Proposed Development is not located within an area identified with priority peatland habitat. Small area of Class 1 and 2 peatland is recorded near Loch Lundie.

1.3 Definition of Peat

Peat is defined as a material consisting of the partially decomposed remains of plant material and organic matter preserved in a waterlogged environment resulting in anaerobic conditions and is of a depth >0.5 m.

Peat can be classed as two principal types, the acrotelm layer, and the catotelm layer as shown on Plate 1-1 and described in the following paragraphs.

Plate 1-1: Drawing of two layered Structure of Active Bog Peatlands Above Non-Active Peat





The acrotelm layer is found in the upper layer of peat where conditions are relatively dry and comprises living vegetation and partially decomposed plant material. Hydraulic conductivity in this layer tends to be higher in relation to distance from the water table. The thickness of the acrotelm layer varies depending on topography such as steepness of slope, peat hags, and hummocks. In particular, the acrotelm layer can be affected during periods of drought or as a consequence of drainage. Fibrous in texture, the acrotelm layer has some tensile strength and is generally considered to be stable for storage and re-use.

The catotelm layer is found under the acrotelm layer and comprises decayed plant material and organisms and is denser and with a very low hydraulic conductivity. The catotelm layer sits below the water table resulting in permanent anaerobic conditions. The catotelm layer is amorphous and has very low tensile strength making it less suitable for storage and re-use.



2.0 Assessment Methodology

2.1 Requirements of National Planning Policy 4

The intent of Policy 5 (Soils) of National Planning Policy 4 (NPF4)¹² is "to protect carbon rich soils, restore peatlands and minimise the disturbance of soils from development".

The Policy states [5(a)] that development proposals should only be supported if they are designed and constructed:

- in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and
- in a manner that protects soils from damage including from compaction and erosion, and that minimises soils sealing.

Further [5(c)] confirms that development proposals on peatland, carbon rich soils, and priority peatland will only be supported if:

- essential infrastructure and there is a specific locational need and no other suitable site;
- the generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;
- small-scale development directly linked to a rural business, farm or croft;
- supporting a fragile community in a rural or island area; or
- restoration of peatland habitats.

And [5(d)] confirms that where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify:

- the baseline depth, habitat condition quality and stability of carbon rich soils;
- the likely effects of the development on peatland, including on soil disturbance; and
- the likely net effects of the development on climate emissions and loss of carbon.

Policy 5 also confirms that the site specific (above) assessment [5(d)] "should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A peat management plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration".

This Stage 1 PMP considers the protection and safeguarding of peat and seeks to fulfil the requirements of Policy 5(d).

¹² Scottish Government (2023). https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2022/11/national-planning-framework-4-revised-draft/documents/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4-revised-draft.pdf [accessed January 2023]



2.2 The Mitigation Hierarchy

SEPA¹³, ¹⁴ has published guidance regarding the mitigation hierarchy which is summarised below:

- Prevention avoiding generating excess peat during construction (e.g., by avoiding peat areas or by
 using construction methods that do not require excavation such as floating tracks);
- **Re-use** use of peat produced on site in restoration or landscaping, provided that its use is fully justified and suitable;
- Recycling / Recovery / Treatment modify peat produced on site for use as fuel, or as a compost / soil
 conditioner, or dewater peat to improve its mechanical properties in support to re-use; and
- **Storage** storage of peat up to a depth of 2 m is not classified as a waste and does not require authorisation from SEPA, however care must be taken to ensure that it does not cause environmental pollution.

2.3 Guidance & Good Practice

Legislation relevant to the management of peat includes the following:

- The UK Climate Change Act 2008 (c 27);
- Environmental Protection Act 1990 (as amended);
- Landfill (Scotland) Regulations 2003 (as amended); and
- The Waste Management Licensing (Scotland) Regulations 2011.

There are a number of guidance documents relevant to the assessment of peat management which have been used to complete this assessment and include:

- SEPA Regulatory Position Statement Developments on Peat (Scottish Environment Protection Agency, 2010);
- Good Practice during Windfarm Construction, 4th Edition (Scottish Renewables, Scottish Natural Heritage (now NatureScot), Scottish Environment Protection Agency, Forestry Commission Scotland, Historic Environment Scotland, Marine Scotland Science and AEECoW, 2019);
- Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Scottish Government, January 2017);
- Floating Roads on Peat Report into Good Practice in Design, Construction and Use of Floating Roads on Peat with reference to Wind Farm Developments in Scotland (Forestry Commission Scotland & Scottish Natural Heritage, 2010);
- Managing Geotechnical Risk: Improving Productivity in UK Building and Construction (Institution of Civil Engineers, 2001);
- Ground Engineering Spoil: Good Management Practice CIRIA Report 179 (CIRIA, 1997);
- Scottish Roads Network Landslides Study Summary Report (Scottish Executive, 2005); and

¹⁴ Scottish Renewables, Scottish Environment Protection Agency. 2012. Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and the Minimisation of Waste.



¹³ Scottish Environment Protection Agency. 2010. Regulatory Position Statement – Developments on Peat.

 Guidelines for the Risk Management of Peat Slips on the Construction of Low Volume/Low-Cost Roads on Peat (Forestry Commission, 2006).



3.0 Proven Occurrence of Peat

The Proposed Development is in an area where the existing land use comprises coniferous forestry, moorland and upland terrain.

Habit mapping has been undertaken and reported in Chapter 8: Terrestrial Ecology of the EIA Report and include details of the National Vegetation Classification (NVC) mapping undertaken.

The peat probing was undertaken by experienced SLR geologists at 44 tower locations and new permanent access tracks (see Figure 10.8 and 10.9) associated with the Proposed Development. Probing was undertaken at the centre of each proposed tower location, along the route of the OHL, and along the proposed permanent access tracks at approximately 50 m intervals and at 25 m each side to establish the depth of peat. Peat depth probing was also undertaken within the LOD of the proposed diversions of the existing 132 kV OHLs into the proposed Loch Lundie Substation.

Over 2435 peat probes were advanced and used to complete this assessment. Probing was undertaken in areas of forestry where access was possible and could be safely completed.

In summary the peat probing has shown that:

- soils between 0 0.5 m depth were recorded at 35 tower locations;
- peat between 0.5 1 m depth was recorded at 8 tower locations;
- peat between 1 2 m depth was recorded at 1 tower location; and
- permanent access tracks recorded an average peat depth of <0.5 m with localised areas of deeper peat recorded between Towers 33 and 35 and at Tower 23.

Where present, peat was recorded to be underlain by glacial till and bedrock.

Limited erosion to peat, where it was recorded, as a consequence of rainfall – runoff or grazing was witnessed during the field campaigns.

Peat has been proven to be virtually absent from the hill tops locally and on steeper hills sides.

With reference to Policy [5(a)] of NPF4 it is evident, as a consequence of the field investigation and iterative project design, that the Proposed Development has avoided deep peat. This is also consistent with SEPA's waste hierarchy, and specifically, the prevention of generating soils and peat for which a re-use will need to be found.



4.0 Potential Effects on Soils and Peat

4.1 Construction Phase

The proposed working area around each steel lattice tower would be no greater than $50 \text{ m} \times 50 \text{ m}$ (regardless of the foundation solution), with a foundation depth of up to 4 m beneath each leg of the tower. In each instance the superficial cover would be removed and set aside for restoration as soon as the towers are complete.

Typically, access will be established through a combination of:

- use of existing tracks, to be upgraded where required;
- use of temporary tracks; and
- construction of permanent new stone tracks.

The majority of access will be achieved through use of existing tracks. Permanent new tracks would have a width of 6 m, with an overall construction corridor of approximately 8 m to allow for suitable drainage and pollution prevention measures.

Site clearance and preparation works for construction of the OHL (including diversions) and temporary and permanent access tracks have the potential to result in the following effects on soils and peat without appropriate controls or mitigation:

- over compaction of soils caused by the use of heavy machinery on-site;
- structural deterioration of soil materials during excavation, soil handling, storage and replacement;
- erosion and loss of soils during soil handling, storage and replacement;
- disturbance and loss of deposits of peat;
- ground instability (including peat slide risk) and contamination;
- impact to sensitive geological receptors (see Chapter 10: Geology Soils and Water, Table 10.7); and
- an adverse effect on geological setting from pollution, fuel, oil, concrete or other hazardous substances.

4.2 Operational Phase

During operation of the Proposed Development, it is anticipated that routine maintenance of infrastructure and tracks would be required. It is not anticipated that there would be any excavation or need to stockpile large volumes of soils or peat, reducing the potential effects on soils or ground stability.

Should any excavation be required, this is likely to be limited and required for maintenance of tracks etc. Any excavation, handling and placement of material would be subject to the same safeguards that would be used during the construction phase of the project. Should any maintenance be required on-site which would involve construction activities; mitigation measures would be adhered to along with the measures in the CEMP to avoid potential effects. Potential operational effects on peat and soil are therefore not considered further in this assessment.



5.0 **Soil and Peat Management**

5.1 Waste Classification

The main activities which have the potential to impact on soil and peat resources are the construction of access tracks and the construction of tower foundations.

This part of the outline PMP includes the method for dealing with soils and peat which could potentially be classified as waste. Table 5-1 outlines where those materials that are likely to be generated on-site fall within the Waste Licensing Regulations.

Review of Table 5-1 shows that all of the materials to be excavated on-site would fall within the non-waste classification as the topsoil and peaty soils can be readily re-used on-site. Based on a detailed probing exercise and visual inspection of the peat, the peat is predominantly fibrous — pseudo-fibrous peat to depths of around 1.5 m which would be suitable to be re-used on-site. Typically, the peat was found to be fibrous and fairly dry within the top 1.5 m before becoming more amorphous with depth.

Table 5-1: Excavated Materials – Assessment of Suitability

Excavated Material	Indicated Volume on-site by % of total excavated soils	Is there a suitable use for material	Is the material required for use on-site	Is the material classified as waste	Is there re- use potential	Re-use on-site
Mineral Soil	25	Yes	Yes	Not classified as waste	Yes	Soils can be completely reused in reinstatement
Turf (Surface layer of vegetation and fibrous matt)	35	Yes	Yes	Not classified as waste	67	Turves can be completely reused in reinstatement
Acrotelmic Peat	35	Yes	Yes	Not classified as waste	Yes	Peat will be completely re- used in reinstatement



Excavated Material	Indicated Volume on-site by % of total excavated soils	Is there a suitable use for material	Is the material required for use on-site	Is the material classified as waste	Is there reuse potential	Re-use on-site
Catotelmic Peat (amorphous material unable to stand unsupported when stockpiled >1 m)	5 Very limited as it has been	Potentially	Potentially	Potentially if not required as justifiable restoration of habitat management works	Limited	If peat does not require treatment prior to re-use it can be used onsite providing adequate justification and method statements are provided and approved by SEPA. If it is unsuitable for use without treatment then it must be regarded as waste. However, every attempt to avoid this type of peat has been incorporated into the design.

5.2 Outline Soil and Peat Management Proposals

5.2.1 Excavation of Soils and Peat

Soil and peat should be excavated as turves, including the acrotelm (surface vegetation) typically up to 500 mm thick. The following best practice should be applied:

- the turves should be as large as possible to minimise desiccation during storage;
- turves should be kept vegetation side up to avoid damage to living vegetation;
- contamination of excavated peat with substrate materials should be avoided; and
- the timing of excavation activities should be considered to avoid very wet weather and multiple handling to minimise the likelihood of excavated peat losing structural integrity.

5.2.2 Storage of Soils and Peat

This Stage 1 PMP assumes the temporary storage will be provided within the corridor LOD and will be reused during restoration of each tower. Further stockpiles would be formed along access tracks where required and where appropriate to do so.



Material stored in the track stockpiles would be used for the progressive reinstatement on cut and fill slopes and verges as well as the reinstatement of access tracks. No mineral / soil will be used as final top dressing. Peat will be used as a top dressing to depths of 500 mm, to ensure any reseeding in the absence of turves is successful.

During storage, the following best practice should be applied:

- stripped materials should be carefully separated to keep peat and other soils apart;
- to minimise handling and haulage distances, excavated material should be stored local to the site of excavation or end point of restoration;
- stockpiles should be isolated from watercourses or drains with appropriate bunding to minimise pollution risks;
- storage locations should be designed to minimise impact on sensitive habitats and species;
- peat turves should be stored in wet conditions or irrigated to prevent desiccation (once dried, peat will not rewet);
- stockpiling of peat should be in large volumes to minimise exposure to wind and sun (and desiccation),
 but with due consideration for slope stability and environmental constraints;
- peat storage areas should be monitored during periods of very wet weather, or during snowmelt, to identify early signs of peat instability; and
- excavated peat that requires to be stored temporarily should be placed to a maximum of 1 m in height and to reduce impact to habitat, on pre stripped areas.

5.2.3 Transport of Soils and Peat

During transportation, the following good practice should be applied:

- movement of turves should be kept to a minimum once excavated, and therefore it is preferable to transport peat planned for translocation and reinstatement to its destination at the time of excavation; and
- if dump trucks that are used for transporting non-peat material are also to be used for peat, measures should be taken to minimise cross-contamination of peat with other materials.

5.2.4 Access Tracks

There is guidance available to support access track design in peatlands. Guidance is focussed on floating tracks on areas of deeper peat.

Excavated tracks require complete excavation of soils and peat to a competent substrate. Excavated tracks are typically undertaken where peat depths are less than 1 m. This peat would require temporary storage ahead of re-use in the reinstatement of track verges. Good practice guidance relates to drainage in association with excavated tracks as follows:

- trackside ditches should capture surface water (within the acrotelm) before it reaches the road;
- interceptor drains should be shallow and flat bottomed (and preferably entirely within the acrotelm to limit drawdown of the water table);
- any stripped peat turves should be placed back in the invert and sides of the ditch to assist regeneration;
 and
- culverts and cross drains should be installed under excavated tracks to maintain subsurface drainage pathways (such as natural soil pipes or flushes). Discharge from constructed drainage should allow for



much diffuse dispersion of clean (silt free) water as possible while minimising disturbance to existing peatland as far as possible. Silt mitigation measures will be incorporated into all constructed drainage and will be detailed in the site-specific CEMP.

Excavation is normally undertaken where soils and peat are shallow (< 1 m), there is a possibility of minor slippage from the cut face of the peat mass. Accordingly, free faces should be inspected for evidence of instability (cracking, bulging, excessive discharge of water or sudden cessation in discharge).



6.0 **Conclusion**

A comprehensive programme of peat depth probing has been completed to support the design of the Proposed Development. Initial peat depth probing was undertaken early in the project design and as a consequence areas of deep or expansive peat have been avoided by the development design. This is consistent with the Policy requirements of NPF4 and SEPA's waste hierarchy, which seek to minimise the disturbance of soils and peat.

As required by NPF4 this Stage 1 PMP presents a detailed and site specific assessment which characterises the distribution, depth and condition of the soils and peat. The assessment considers the potential likely effects on soils and peat and the measures required to safeguard soils and peat. Specifically, the assessment has shown that no waste soil or peat would be generated by the Proposed Development.

The limited volume of peat which would be disturbed has been proven to be fibrous and thus readily handled and suitable for temporary storage and beneficial re-use. Proposals for the re-use and management of soils and peat have been outlined. It has been shown that the integrity of soils and peat temporarily disturbed can be retained, and their ability to sustain a functioning peatland system capable of achieving carbon sequestration can be maintained.

With the safeguards presented in this Stage 1 PMP the Proposed Development would not result in a loss of carbon from soils or peat.

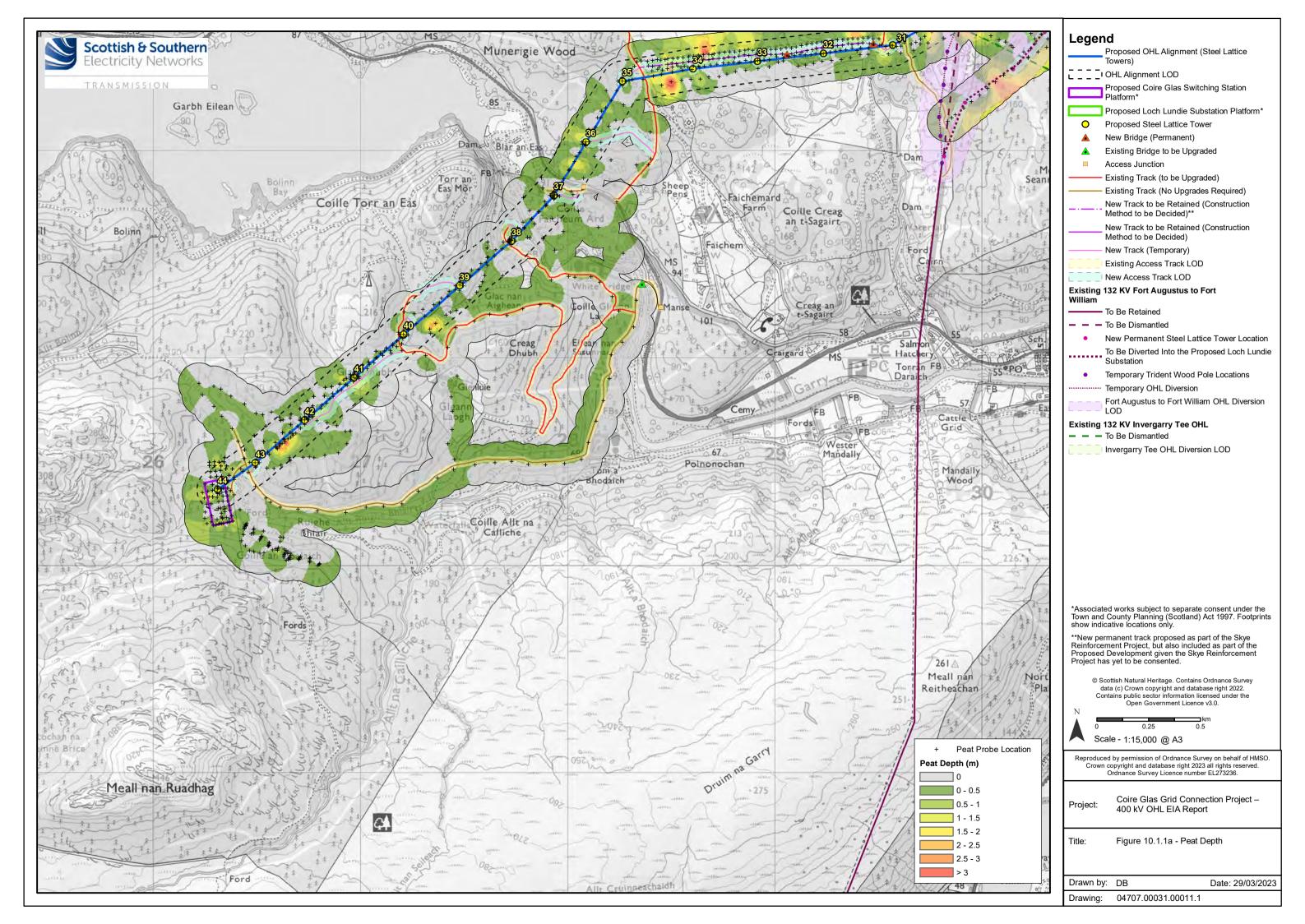
With regard to soils and peat it is concluded that the Proposed Development can be constructed and operated in accordance with the Policy aims of NPF4.

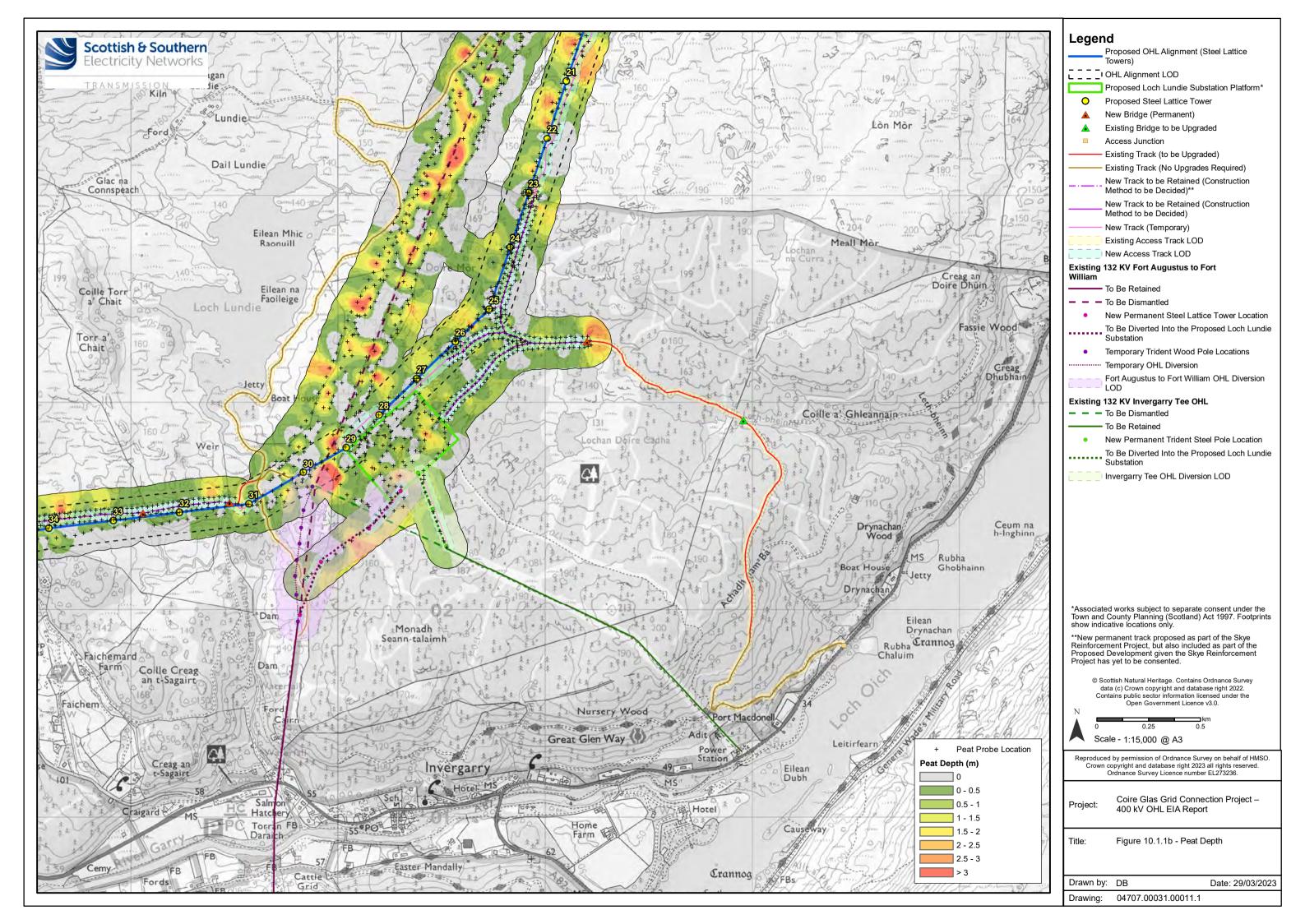


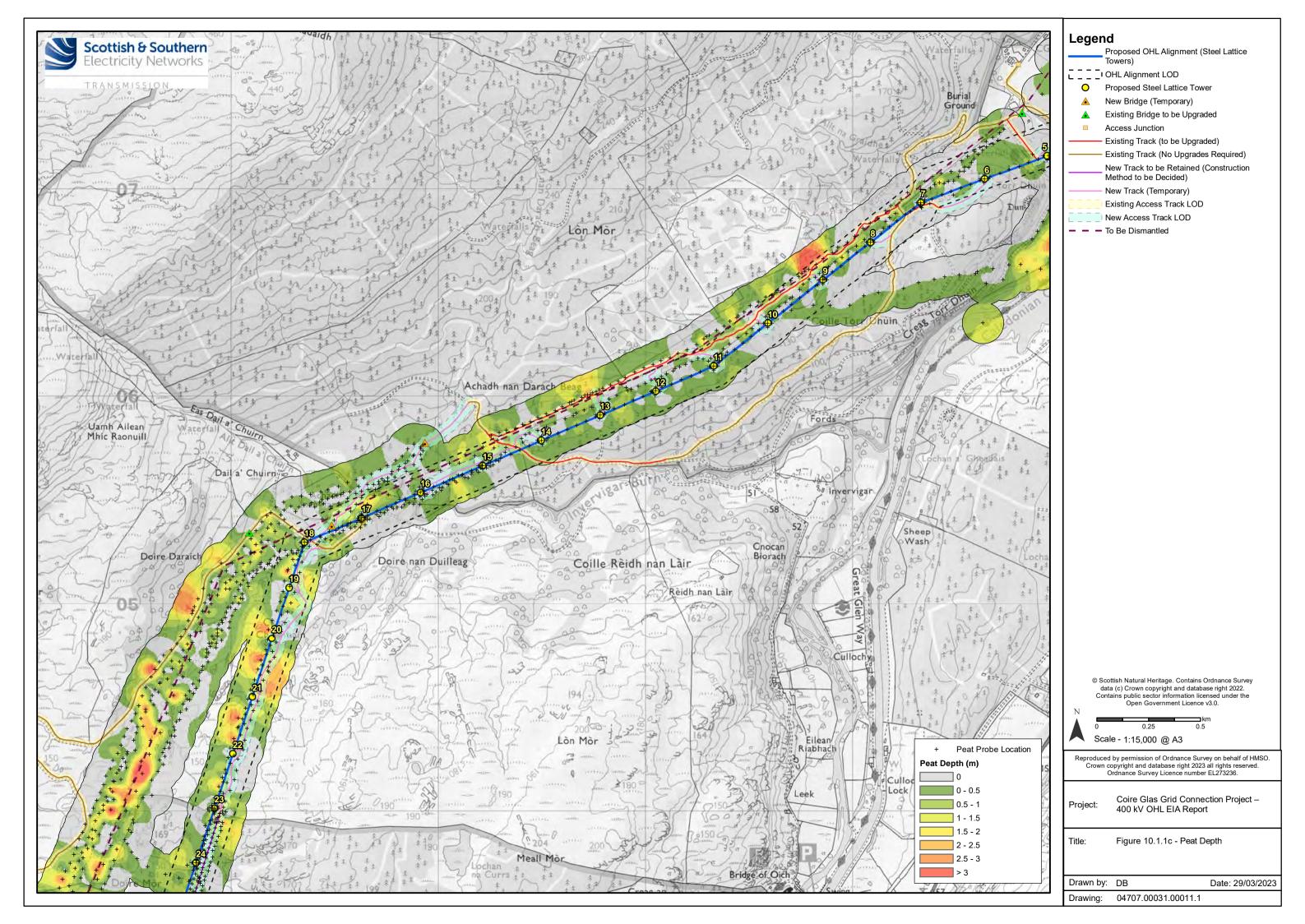
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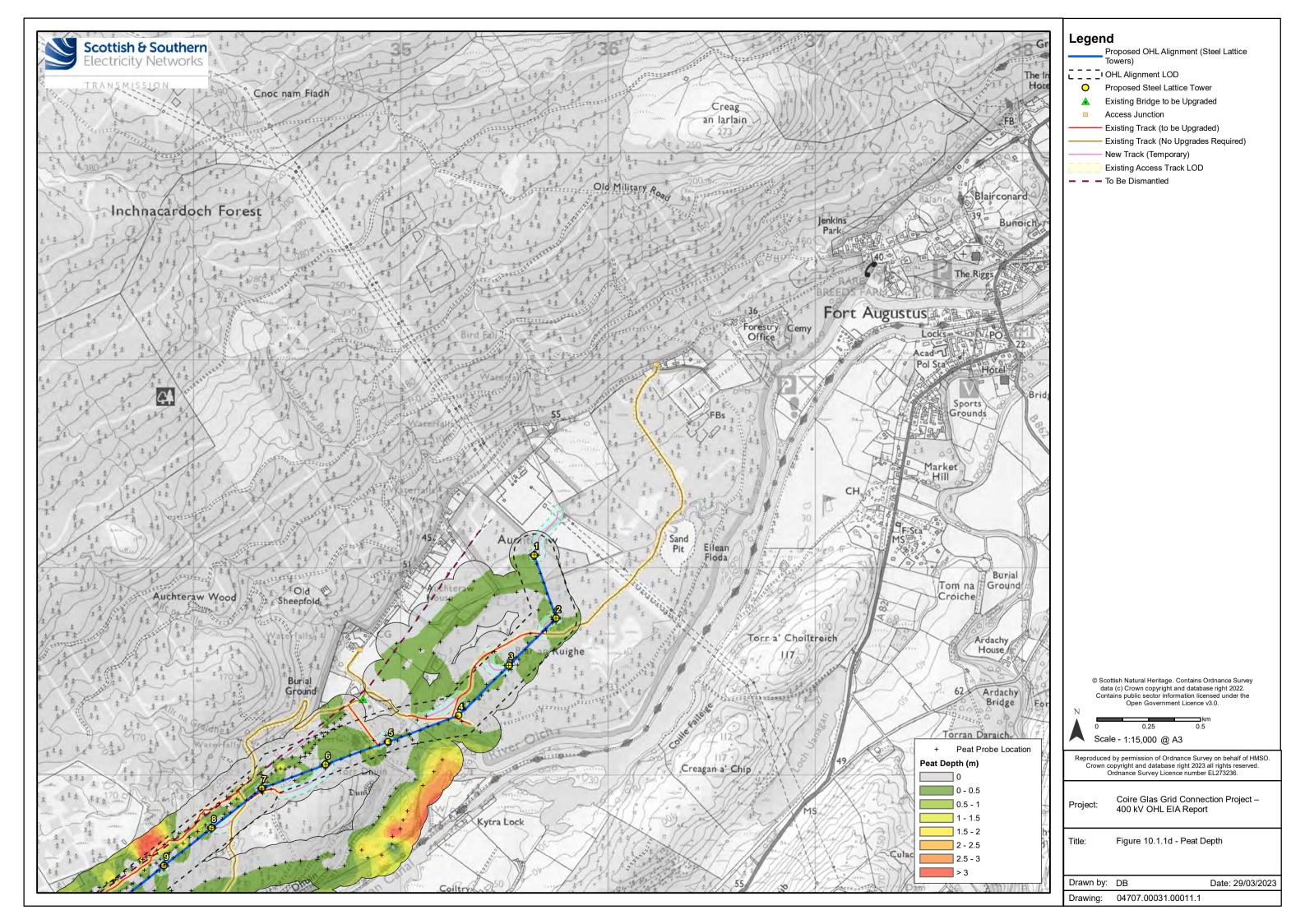
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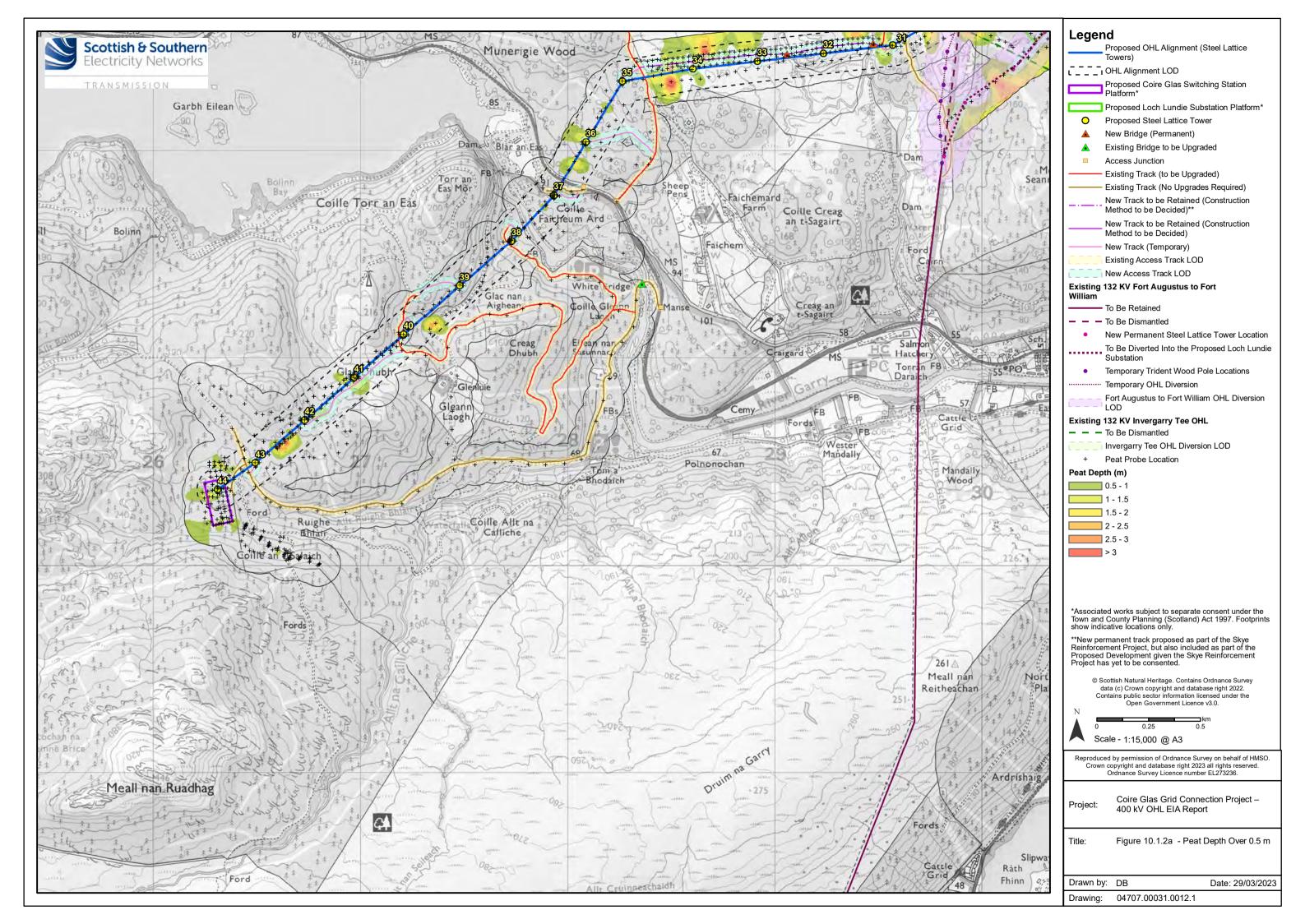


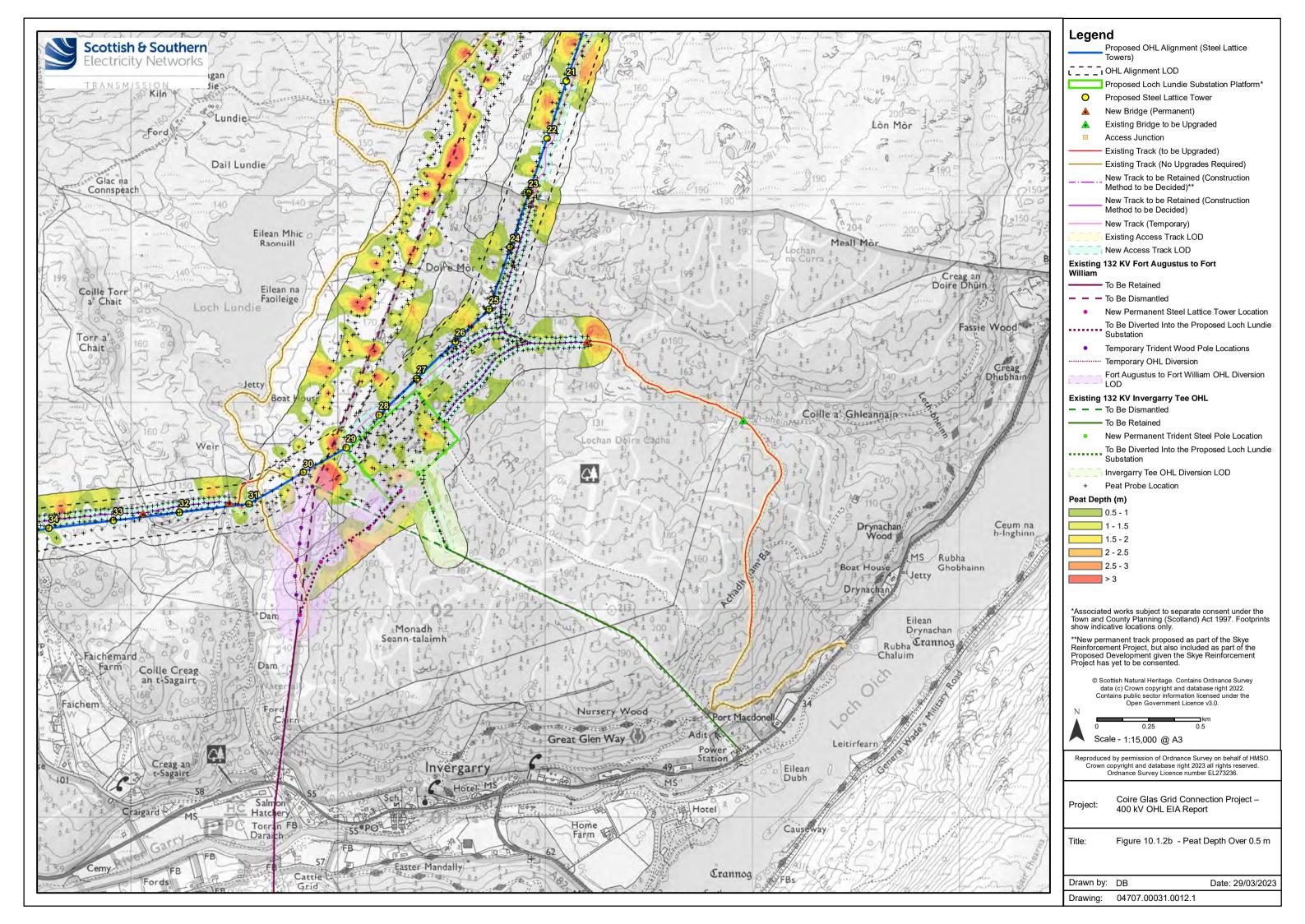


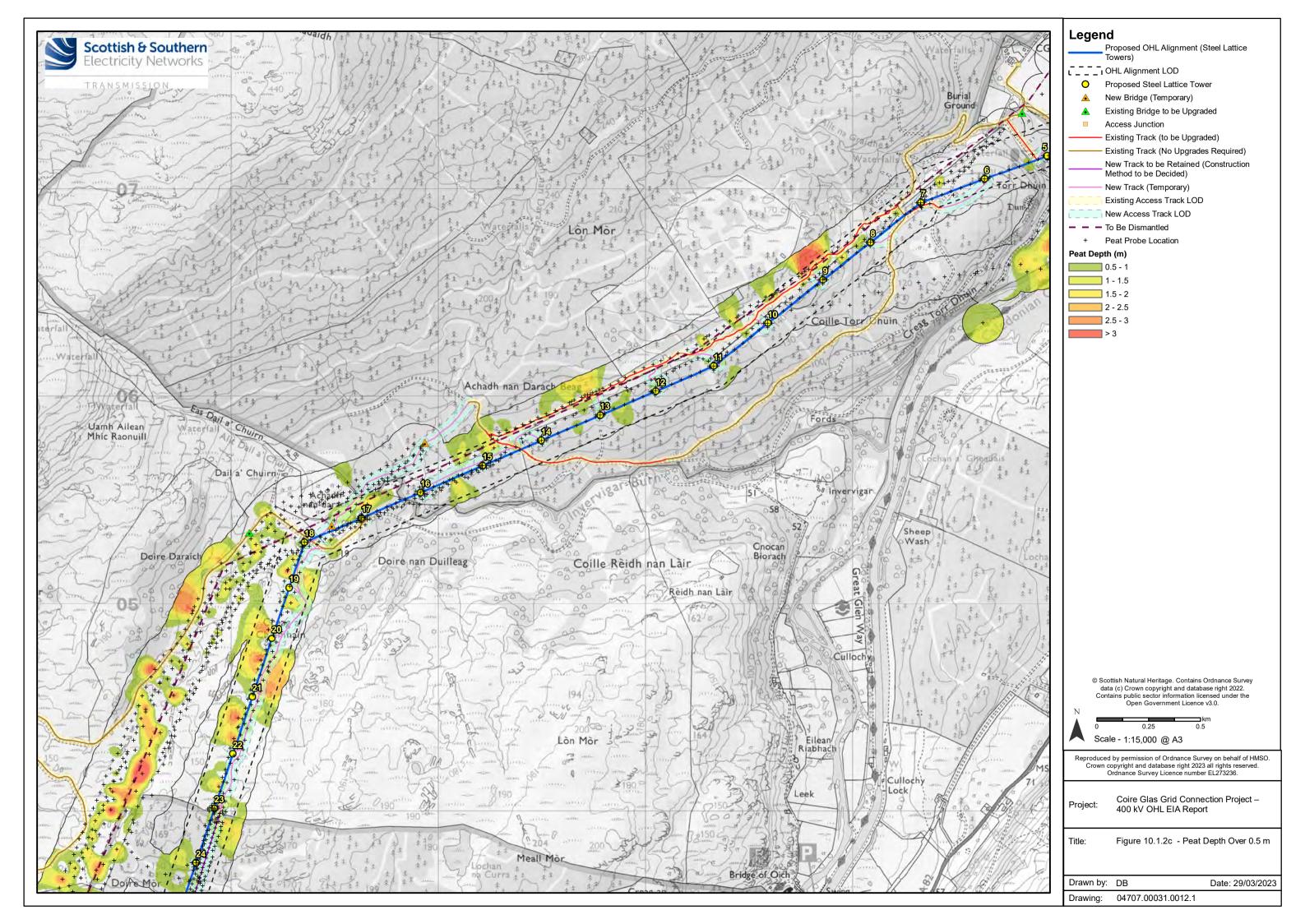


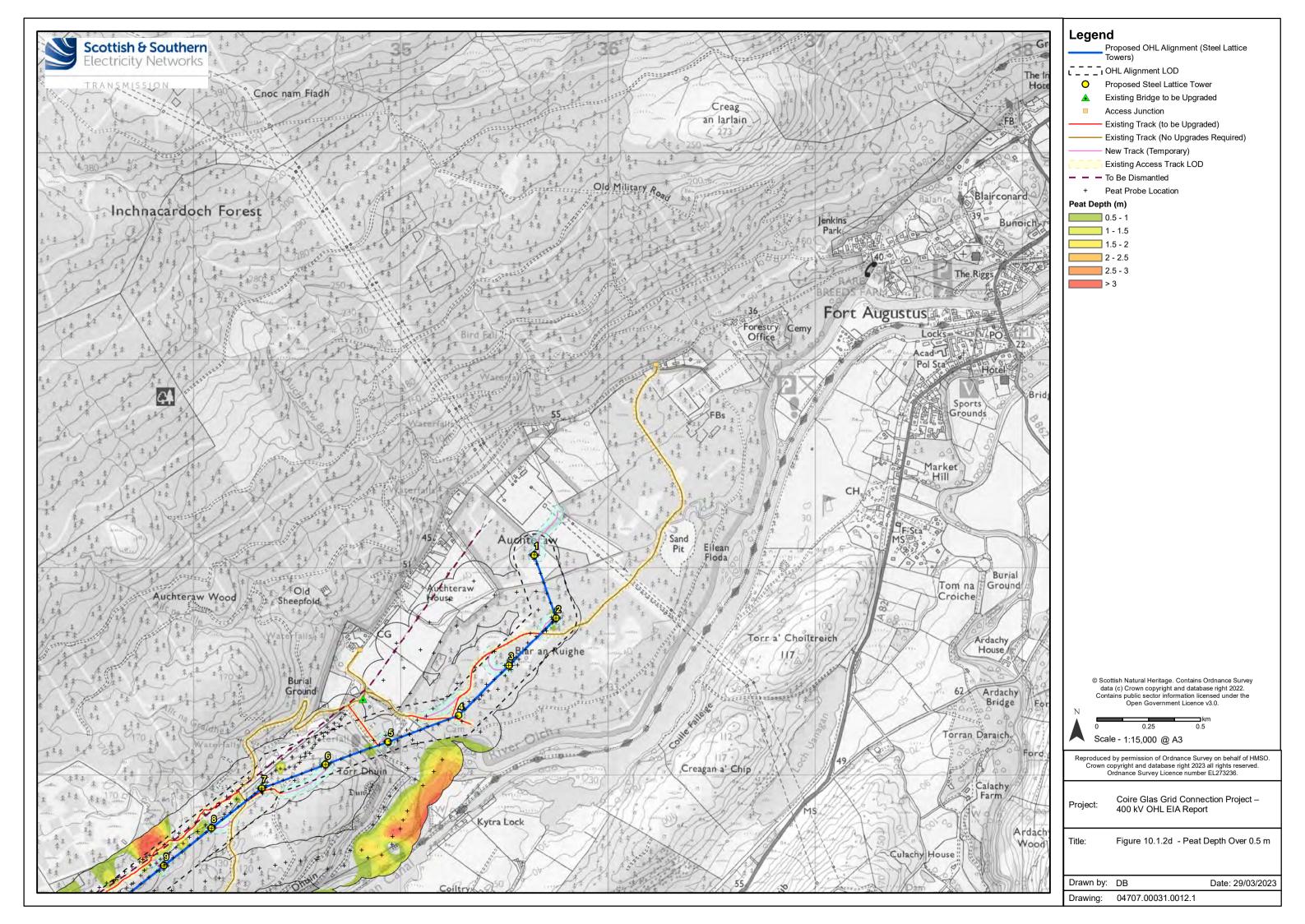












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