

Technical Appendix 8.1: Updated Preliminary Peat Management Plan

8.1. Introduction

8.1.1. The Scottish Renewables and Scottish Environment Protection Agency (SEPA) (2012) guidance identify the following three main stages in the development process and describes what data should be gathered and assessed at each to inform a site-specific Peat Management Plan (PMP):

- Stage 1: Environmental Impact Assessment Report (EIA);
- Stage 2: Post-consent / pre-construction; and
- Stage 3: Construction.

8.1.2. This Updated Preliminary PMP has been prepared in accordance with the requirements of Stage 1 and demonstrates to SEPA and other relevant parties that:

- The extent and characteristics of peat at the study site have been investigated;
- Excavations in peat have been minimised wherever possible through design iterations and adoption of appropriate design hierarchy; and
- Subsequent management of peat, including an estimation of quantities, has been considered as part of the EIA.

8.1.3. This Technical Appendix comprises an Updated Preliminary PMP, that has been prepared on behalf of the Applicant for the construction of the Proposed Varied Development and should be read in conjunction with **Chapter 8: Geology, Soils and Peat**.

8.1.4. This Updated Preliminary PMP seeks to demonstrate how the Proposed Varied Development has been designed to avoid the wastage of peat through application of the waste hierarchy of the Scottish Executive Waste Management Licensing (Scotland) Regulations 2011. It is noted that while there will be a loss of peatland habitat, this Updated Preliminary PMP seeks to show that no waste peat will be taken off-site and is compliant with National Planning Framework 4 (NPF4).

8.1.5. This approach is largely consistent with the 2018 Environmental Impact Assessment Report (EIAR) undertaken for the Consented Development. However, due to changes in the Site design, resulting from the increase in turbine size and supporting infrastructure for the S36C Proposed Varied Development, an Updated Preliminary PMP has been prepared and replaces the 2018 Appendix 11.3 undertaken for the Consented Development.

8.1.6. This Updated Preliminary PMP provides details on the anticipated approximate volumes of peat that may be excavated during construction, the characteristics of the peat that

would be excavated, and the principles and methods of how and where this excavated peat would be stored, re-used and managed.

- 8.1.7. This Updated Preliminary PMP will be further developed and agreed subsequent to the Proposed Varied Development receiving consent. Further details and specific plans will be developed during the detailed design stage following pre-construction site ground investigations (GI). These details will then be included within the Final PMP and submitted for approval under the relevant planning condition.
- 8.1.8. Further refinement of design assumptions and construction methodologies will also be informed by the outcomes of the pre-construction GI. These details will then be included in the Final PMP, as part of the detailed Construction Environment Management Plan (CEMP). The responsibility for the implementation of the Final PMP would be with the Principal Contractor.

8.2. Policy and Guidance for Peat Management

- 8.2.1. The significance of peatlands is most evident in their protection by various legislation, policy and local, national or international initiatives including, but not limited to:
- United Kingdom Biodiversity Action Plan (UKBAP)
 - Scotland's National Peatland Plan (SNH, 2015)
 - European Council Habitats Directive 92/43/EEC (Council of the European Communities, 1992)
 - Scottish Biodiversity List (SBL) (Scottish Government, 2013)
 - European Council Water Framework Directive 2000/60/EC (Council of the European Communities, 2000)
 - Scottish Government discussion paper on the Management of Carbon-Rich Soils (Scottish Government, 2010)
 - Scottish Soil Framework (Scottish Government, 2009)
 - Climate Change Plan (2017-2032) (Scottish Government, 2017)
- 8.2.2. The Scottish Environment Protection Agency (SEPA) has a statutory and legislative duty to ensure that where peat spoil is generated during construction; that it is stored, re-used, treated or disposed of correctly; which may require authorisation or permits.
- 8.2.3. As such, this Updated Preliminary PMP has been prepared in accordance with the following policy and best practice guidance:
- Good Practice during Windfarm Construction (Scottish Renewables, SNH, SEPA & Forestry Commission Scotland, 4th Edition 2019)
 - Guidance on Developments on Peatland: Site Surveys (Scottish Government, Scottish Natural Heritage and SEPA, 2017)
 - SEPA Regulatory Position Statement – Developments on Peat (SEPA, 2010)
 - Guidance on the Assessment of Peat Volumes, Re-use of Excavated Peat and the Minimisation of Waste (Scottish Renewables and SEPA, 2012)

- Peat Landslide Hazard and Risk Assessments. Best Practice Guide for Proposed Electricity Generation Developments (Scottish Government, 2017)
- Developments on Peat and Off-Site Uses of Waste Peat (SEPA, 2017)

8.2.4. Additionally, the publication of the NPF4 has illustrated the importance of more considered practices within peatlands. In relation to development proposals on peatland carbon-rich soils, and priority peatland habitat, Policy 5 of NPF4 states:

c) Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:

- i) Essential infrastructure and there is a specific locational need and no other suitable site.*
- ii) The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets.*
- iii. Small-scale development directly linked to a rural business, farm or croft;
- iv) Restoration of peatland habitats.*
- v) Restoration of peatland habitats.*

d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site-specific assessment will be required to identify:

- i) the baseline depth, habitat condition, quality and stability of carbon rich soils.*
- ii) the likely effect of the development on peatland, including on soil disturbance.*
- iii) the likely net effect of the development on climate emissions and loss of carbon.*

8.2.5. As such, the details provided in NPF4 have been considered in this Updated Preliminary PMP along with Chapter 8: Geology, Soils and Peat.

8.3. Assessment Methodology

8.3.1. To provide the information required for Stage 1: EIA under the Scottish Renewables and SEPA (2012) guidance, the peat depth assessment involved the following stages:

- Desk study;
- A review of peat depth through surveys (historic and recent) and infrastructure design;
- Volume calculations for excavation and re-use; and
- A review of peat handling and storage guidance.

8.3.2. The calculations within this Updated Preliminary PMP are based on the construction of the different types of infrastructure across the Proposed Varied Development that are likely to require peat excavation. The calculations are conservative at this stage of design and represent a worst-case scenario.

- 8.3.3. The estimated volume of peat excavated for re-use has been calculated using area specific or infrastructure specific information and using a modelled peat contour plan which was created using results from high-density probing surveys. This provides a degree of confidence in the estimation of the volumes of peat to be excavated and consequently re-used.

8.4. Definition of Peat - Acrotelmic and Catotelmic Layers

- 8.4.1. Peat soils in Scotland are defined as soil with a surface peat layer with more than 60% organic matter and of at least 50cm thickness (NatureScot, 2023). Peaty soils have a shallower peat layer (<50cm) at the surface. Peat is found in naturally cold, highly acidic and waterlogged environments, which provide ideal conditions for a slow transformation of peatland vegetation into peat material - a form of soil organic matter stable over long period of time if undisturbed.
- 8.4.2. The Scottish Government Peat Landslide Hazard Best Practice Guide (Scottish Government, 2017) uses the following Joint Nature Conservation Committee (JNCC) report 455 'Towards an Assessment of the State of UK Peatlands' (JNCC, 2011) definition for the classification of peat deposits:
- Peaty (or organo-mineral) soil: a soil with a surface organic layer less than 0.5m deep;
 - Peat: a soil with a surface organic layer greater than 0.5m deep which has an organic matter content of more than 60%; and
 - Deep Peat: a peat soil with a surface organic layer greater than 1.0m deep.
- 8.4.3. Where peat is identified, there are two principal types of peat, as identified by the JNCC report:
- The upper (acrotelm) layer which contains newer plants and plant material and includes any living matter or mosses. The layer is an active peat-forming mire, composed of the most recently deposited material, within which the water table fluctuates and where water moves more freely.
 - The lower (catotelm) layers are typically amorphous, with very high-water content and are almost continually waterlogged. The catotelm represents older peat material within which water moves less freely.
- 8.4.4. The Scottish Government Peat Survey Guidance from 2014 stated the acrotelm layer is usually less than 300mm thick but may be up to 500mm. It is also noted that the Lindsay and Bragg – Windfarms and Blanket Peat (Lindsay and Bragg, 2005) suggest the acrotelm is typically around 0.5m in thickness.
- 8.4.5. The Scottish Government Guidance document (Scottish Government, SNH & SEPA, 2017) records three different naming conventions depending on the depth of the peat deposits. These are listed as follows:

- Peaty Soil – a peat or surface organic soil with a depth of <0.5m (Note, as no estimated volumes have been provided as part of this Updated Preliminary PMP, this will be treated as topsoil in line with best practice);
- Peat – a peat of ≥0.5m but ≤1.0m depth and which has an organic matter content of >60% (Note, an average acrotelm thickness of 0.45m was applied to the Site design with the remaining thickness then estimated to be the Catotelmic layer); and
- Deep Peat – a peat that is >1.0m depth.

8.4.6. For the purposes of this assessment, where peat is present, a thickness of 0.45m for acrotelm is assumed.

8.5. Peat Conditions

8.5.1. Peat is present across the Site. As such, and in line with NPF4, a series of peatland and ground condition surveys have been undertaken across the Site. These surveys have been carried out at different stages of the project to refine infrastructure layout and improve understanding of peat depth distribution. Details of the peatland surveys are detailed in the following sections.

8.5.2. Four surveys were undertaken between September 2013 and March 2026, with a total of 2,555 peat probes taken for the Consented Development and an additional 449 peat probes recorded for the Proposed Varied Development. In total, 3,004 peat probes have been taken for the Proposed Varied Development, described further below.

Initial Surveys

8.5.3. A combined peat survey and ground condition survey was undertaken between September 2013 and June 2014, in accordance with industry standard survey methods applicable at that time. This work included:

- An initial peat depth survey across the Proposed Varied Development area on a 100m grid to establish baseline peat distribution (September 2013);
- A detailed peat survey undertaken in November 2013 to inform early design iterations; and
- Completion of final phases of probing and survey work in June 2014.

Phase I Peat Probing

8.5.4. An initial Phase I Peat Probing Survey of the Site was undertaken in 2017. A total of 54 probes was recorded, with a range of peat depths between 0 – 5m. The average depth was 1.4m with a maximum depth of 4.7m.

Phase II Peat Probing

8.5.5. A Phase II Peat Survey of the Site was undertaken in March 2018, in accordance with the current guidance (Scottish Government, SNH & SEPA, 2017). This survey

included additional probing to refine the location of infrastructure, including the temporary construction compound and access to Turbines T8 and T10. A total of 1,878 probes were taken, with a range of peat depths between 0 – 5m. The average depth was 0.6m with a maximum depth of 5m.

Habitat Management Plan (HMP) Peat Probing

8.5.6. Additional peat probing was undertaken in 2024 to inform the HMP. A total of 623 probes were recorded, with a range of peat depths between 0 – 4m. The average depth was 1.1m with a maximum depth of 3.7m. The survey targeted areas relevant to habitat management and restoration.

Additional Peat Probing

8.5.7. Further peat probing was undertaken in March 2026 to support the Proposed Varied Development. Through consultation with SEPA, the following probing regime was agreed:

- 50m centres with 10m offsets along proposed access tracks that were altered for the Proposed Varied Development i.e. proposed tracks with no previous peat probing coverage.
- 50 x 50m grid on proposed borrow pits, substations, construction compounds, laydown areas, operation building locations and turbine crane pads that were altered for the Proposed Varied Development.

8.5.8. Additional peat probing was undertaken in areas where existing survey coverage and peat probe density were insufficient to support the proposed infrastructure and associated works. This included some areas of peaty soil (<0.5m) where additional information was required to inform the infrastructure layout's development and ground condition assessment. Areas where previous surveys had already confirmed peat depths of <0.5m at a sufficient probe density were not subject to further probing.

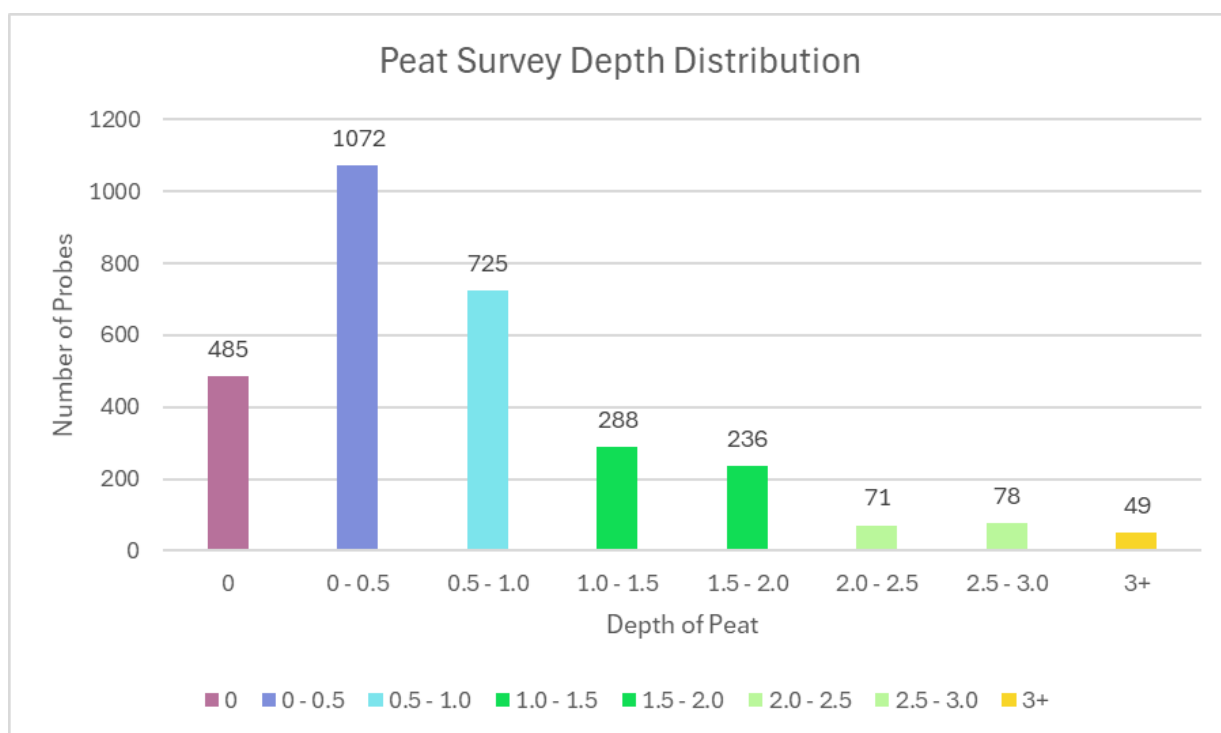
8.5.9. 449 probes were taken during the 2026 Peat Probing Survey, with an average depth of 0.8m and maximum depth of 3.4m recorded.

8.5.10. In total, 3,004 peat probes have been recorded between the Consented Development and the Proposed Varied Development, as summarised in Table 1 and shown in Insert 1 and Insert 2.

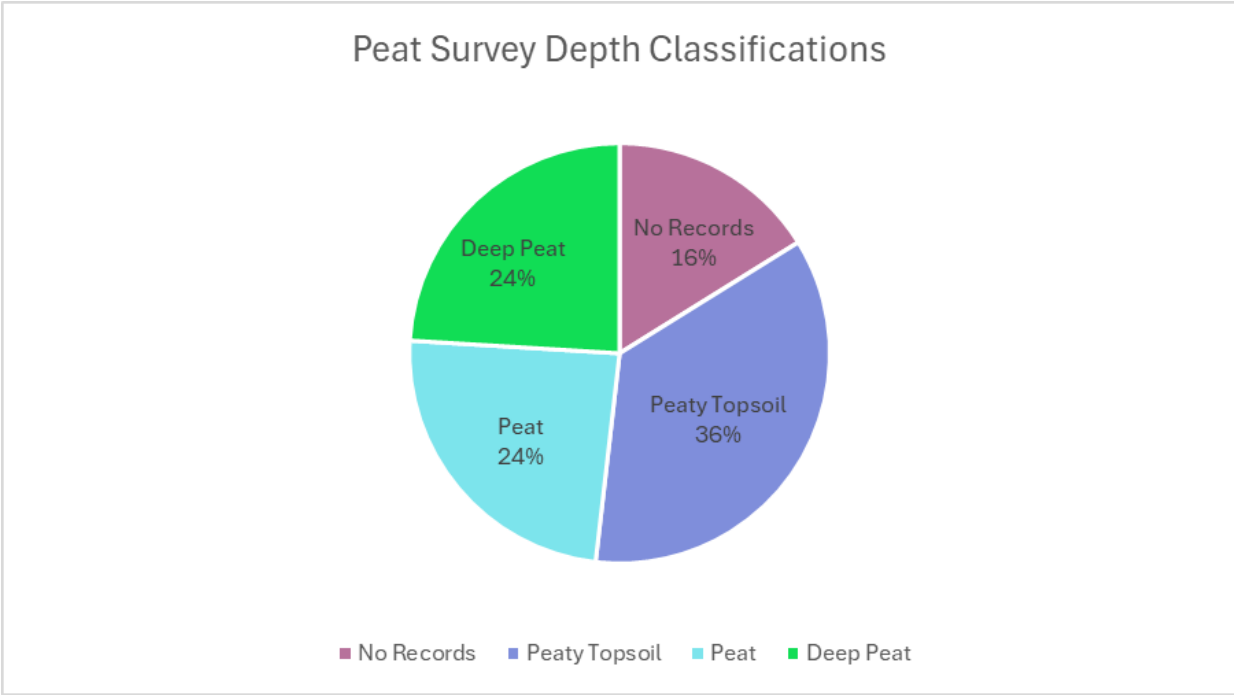
Table 1 - Peat Probing Summary

Peat Probing Exercise	Number of Probes	Maximum Depth	Average Mean
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		Recorded (m)	Depth (m)
2017	54	4.7	1.4
2018	1,878	5.0	0.6
2024	623	3.7	1.1
2026	449	3.4	0.8
Total	3,004		



Insert 1 - Peat Survey Distribution by Depth



Insert 2 - Peat Survey Classifications by Depth

8.6. Peat Excavation

8.6.1. The approach set out in this Updated Preliminary PMP adopts the following mitigation hierarchy:

- Prevent the creation of waste peat by avoidance.
- Minimisation through re-use on site to support construction.
- Minimisation through use on site or off site for peatland restoration (if applicable).

Recycling / recovery for agricultural benefit or recycled through blending with other materials to form a soil substitute or used in other relevant works (is applicable).

- Disposal, only after all other options have been explored and discounted.

8.6.2. Prevention methods have been incorporated into the site design and include the avoidance of the areas of deeper peat and inclusion of floating infrastructure. A number of on-site re-use opportunities have been identified based on best practice guidance. Prevention and re-use measures are detailed later in this document.

8.6.3. This section sets out the measures used to minimise loss of peat habitat and the expected peat excavation volumes.

8.7. Measures to Minimise Peat Habitat Loss

8.7.1. NPF4 has been carefully considered throughout the design process of the Proposed Varied Development. The infrastructure has been specifically designed throughout the iterative EIA process to minimise the impacts on peat by reducing the volume of peat to be excavated, as shown in the various design iterations from the 2018 EIA, as discussed in Chapter 8 of this EIAR.

8.7.2. For the Proposed Varied Development, the layout and infrastructure have been refined from the Consented Development to avoid areas of 'deep peat' and respond to environmental and technical constraints. While the overall number of proposed wind turbines remains the same, the Proposed Varied Development incorporates larger and more efficient turbines and associated infrastructure.

8.7.3. The key differences between the Consented Development and the Proposed Varied Development are summarised in Table 2.

Table 2 - Summary of Key Changes Between Consented and Proposed Varied Development

Parameter	Consented Development (S36)	Proposed Varied Development (S36C)	Comment
No. of Turbines	16	16	No change.
Permanent Hardstanding (per turbine) (m²)	1,800	2,126	Increased due to larger turbines
Temporary Hardstanding (per turbine) (m²)	594	2,385	Reflecting construction needs
New Track Length (m)	7,473	8,621	Increased due to revised layout
Upgraded WF Track Length (m)	3,566	3,547	Slight decrease
Total Access Track Length (m)	11,039	12,168	Slight increase
Passing Places	58	44	Reduced due to revised access strategy
Met Masts	3	3	No changes
Track Width (m)	6	6	No change
Substation Footprint (m)	150 x 130	200 x 100	Increased footprint
Cable Trench Width (m)	6	1.9	Design optimisation

8.8. Floating and Use of Existing Access Tracks

- 8.8.1. The use of floating and re-use of existing tracks have been incorporated into the infrastructure design to minimise loss of peat habitat.
- 8.8.2. Floating access tracks, where tracks are constructed directly on the surface of soft ground, are specified in areas of deeper peat (typically > 1m) where this cannot be avoided through design, in order to minimise peat excavation. For the Proposed Varied Development, approximately 8.6km of new access tracks are proposed, comprising of approximately 0.9km (10.5%) of floating track.
- 8.8.3. The floating tracks will be designed and constructed with best practice guidance set out in Floating Roads on Peat (SNH & FCS, 2010).
- 8.8.4. In addition to the use of floating access tracks, existing access tracks constructed as part of the Tangy I and Tangy II wind farms (referred to as SSER access tracks) will be used as far as possible in order to limit the need to construct new tracks for the Proposed Varied Development. Approximately 3.5km of the 12.2km will be existing SSER access tracks.
- 8.8.5. Due to the utilisation of floating and existing wind farm tracks, new excavated access tracks required for the Proposed Varied Development are limited to approximately 8.6km (70.8%) of the 12.2km total track length.

8.9. Peat Excavation Volumes

- 8.9.1. Table 3 details the construction activities that will generate the peat excavation and the approximate associated (maximum) volumes based on the assumed worst-case scenario. Table 3 considers peat as defined in Section 8.4. Peaty Soil is treated as topsoil in line with best practice. These details are also presented on Figure 8.1.1.
- 8.9.2. The volumes detailed in Table 3 are output from the peat excavation assessment undertaken using GIS software. Please note, Total Peat Volume (m³) is calculated digitally (ArcGIS or similar) using the actual interpolated depth at each point as opposed to Average Peat Depth (m) x Surface Area (m²) i.e. Total Peat Volume (m³) ≠ Average Peat Depth (m) x Surface Area (m²)

Table 3 - Peat Excavation Volumes

Infrastructure Type	Peat Excavation Surface Area (m ²)	Average Peat Depth (m)	Estimated Acrotelm Volume (m ³)	Estimated Catotelm Volume (m ³)	Total Peat Excavation Volume (m ³)
Access Tracks - New	26,984	1.09	11,896	16,918	28,814
Access Tracks - Upgrade	5,813	0.75	4,370	2,914	7,284
Temporary Hardstanding	30,274	1.02	13,192	16,665	29,857
Permanent Hardstanding	13,539	1.08	6,090	8,507	14,597
Borrow Pits	3,930	0.66	1,761	805	2,566
Substation	50	0.53	22	4	26
Temporary Compounds	4,465	0.60	2,182	728	2,910
Subtotal			39,513	46,541	86,054
Total*			49,392	58,176	107,568
Notes					
* Bulking factor of 25% included in the Total Peat to be Excavated in line with (Trenter, 2001).					

8.9.3. It is anticipated that 107,568m³ of peat would be excavated, of which 49,392m³ would be Acrotelm and 58,176m³ would be Catotelm.

8.10. Peat Re-use

8.10.1. This section sets out the measures to re-use peat (re-instatement and restoration) and the expected peat re-use volumes. Where possible, excavated peat will be re-used adjacent to where it has been excavated. Details of re-use volumes and supporting details are shown in Table 4, which has been determined in accordance with Scottish Renewables and SEPA (2012) Guidance on the Assessment of Peat Volumes, Re-use of Excavated Peat and the Minimisation of Waste (2012)¹.

8.10.2. For the purpose of this Updated Preliminary PMP, the locations of peat re-use are largely based on the guidance referenced throughout. However, it is acknowledged that post consent a GI will be undertaken. At this stage, and in line with the completion of the detailed design, the Final PMP will be prepared for approval. At this stage the areas for peat re-use will be reviewed and updated to ensure the most appropriate peat re-use approach is implemented.

¹ Scottish Renewables and SEPA (2012) Guidance on the Assessment of Peat Volumes, Re-use of Excavated Peat and the Minimisation of Waste Available at: <https://www.gov.scot/publications/assessment-of-peat-volumes-reuse-of-excavated-peat-and-minimisation-of-waste-guidance/>

Table 4 - Peat Re-use Volumes

Location	Length (m)	Width of Peat (m)	Depth of Peat (m)	Cross Sectional Area of Peat (m ²)	Plan Area of Peat (m ²)	Volume of Acrotelmic Peat Re-used (m ³)	Volume of Catotelmic Peat Re-used (m ³)	Reason for Re-use
Access Track Verges (Excavated)	9,695	2.0	0.50	1.0	n/a	9,695	n/a	Length includes both sides of each track. Required to create a bund to prevent natural run-off mixing with track run off. Required throughout the site on both sides of the track and tying the access track into landscape.
Access Track Verges (Floating)	3,730	2.0	0.50	1.0	n/a	3,730	n/a	Length includes both sides of each track. Required to create a bund to prevent natural run-off mixing with track run off. Required throughout the site on both sides of the track and tying the access track into landscape.
Turbine Temporary Hardstandings	n/a	n/a	0.26	n/a	56,770.74	14,193	n/a	Reinstatement of temporary hardstanding around 16No. turbines, required for the construction phase of the development. Required throughout to reinstate excavated peat.
Turbine Permanent Hardstanding Verges	2,232	2.0	0.50	1.0	4,465	2,232	n/a	Length includes both sides of each of the permanent hardstanding around 16No. turbines. Required to create a bund to prevent natural run-off mixing with track run off. Required throughout the site on both sides of the hardstanding.
Permanent Compound	593	2.0	0.50	1.0	1,186	593	n/a	Required to create a bund to prevent natural run-off mixing with permanent compound run off.

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Location	Length (m)	Width of Peat (m)	Depth of Peat (m)	Cross Sectional Area of Peat (m ²)	Plan Area of Peat (m ²)	Volume of Acrotelmic Peat Re-used (m ³)	Volume of Catotelmic Peat Re-used (m ³)	Reason for Re-use
Verges								Required around exposed edge of compound and tying the compound into landscape.
Borrow Pit 1 (West of Site)	100	200.00	0.50	n/a	20,000	10,000	n/a	Used to reinstate borrow pit profile to a comparative level with gentle slopes which blend in with the surrounding landscape. Also, to encourage vegetation re-growth.
	100	200.00	1.50	n/a	20,000	n/a	30,000	Used to reinstate borrow pit profile to a comparative level with gentle slopes which blend in with the surrounding landscape. Also, to encourage vegetation re-growth.
Borrow Pit 2 (South-East of Site)	n/a	n/a	0.50	n/a	19,207	9,604	n/a	Used to reinstate borrow pit profile to a comparative level with gentle slopes which blend in with the surrounding landscape. Also, to encourage vegetation re-growth.
	n/a	n/a	1.50	n/a	19,207	n/a	28,811	Used to reinstate borrow pit profile to a comparative level with gentle slopes which blend in with the surrounding landscape. Also, to encourage vegetation re-growth.

8.11. Peat Balance

8.11.1. Table 5 shows the peat balance for the Proposed Varied Development. It is Anticipated that 108,857m³ of peat can be re-used within the site. The assessment identifies a minimal surplus re-use capacity of 1,289m³ (approximately 1.2%), reflecting a precautionary estimate of the Site's peat re-use potential.

Table 5 - Peat Re-Use Volume Summary

Volume Type	Volume of Acrotelmic Peat (m ³)	Volume of Catotelmic Peat (m ³)	Total (m ³)
Excavated	49,392	58,176	107,568
Re-Used	50,046	58,811	108,857
Waste	-654	-635	-1,289

It should be noted that only two of the four borrow pits have been identified for peat re-use. At the time of the Final PMP, opportunities to utilise the remaining borrow pits would be explored.

8.12. Peat Handling

8.12.1. It will be necessary for the Final PMP to detail precise methods and timings involved in handling, storing, and reusing excavated peat materials. The final method statement should follow the principles detailed below, in accordance with the best practice guidance:

- The surface layer of peat and vegetation (Acrotelm) will be stripped separately from the Catotelmic peat.
- Acrotelmic material will be stored separately from Catotelmic material.
- Minimising handling and transportation is essential to retain any existing structure and integrity of the excavated materials and thereby maximise the potential for excavated material to be re-used.
- Less humified Catotelmic peat (consolidated peat), which maintains its structure upon excavation, should be kept separate from highly humified amorphous peat.
- Acrotelmic material will be replaced as intact as possible once construction is complete.

8.12.2. To minimise the handling and transportation of peat, Acrotelmic and Catotelmic peat will be replaced, as far as is reasonably practicable, in the location from which it was removed. Acrotelmic material must always be placed on the surface.

8.12.3. During peat handling, efforts will be made to prevent unnecessary trafficking over peat. Appropriate scale plant (including low pressure equipment) will be used, double handling will be avoided, and a monitoring programme will be installed to ensure mixing of peat and mineral soil is avoided as far as practicable.

8.13. Temporary Peat Storage

8.13.1. It will be necessary for the Final PMP to detail precise methods and timing involved in temporary storage. Should this be required, the preference is that peat is placed at its end use location directly from it being excavated. The final method statement should follow the principles detailed below, in accordance with the best practice guidance.

8.13.2. Temporary storage of peat should be minimised. Excavated soils would be stored at no greater than 1m in height, directly adjacent to, or near the tracks on ground appropriate for storage of materials i.e., relatively dry, and flat ground, a minimum of 50m away from any watercourses. Wherever possible, reinstatement will be carried out as track construction progresses. Key requirements for temporary storage are set out below:

- Suitable storage areas should be sited in areas avoiding watercourses, stability risk, groundwater dependent terrestrial ecosystems or other sensitive areas.
- Reinstatement will, in all instances, be undertaken at the earliest opportunity to minimise storage of turves and other materials.
- Timing of peat construction works, where practicable, to minimise peat excavation and handling during periods of prolonged wet weather conditions, thereby reducing the risk of peat becoming excessively wet and minimise degradation
- Where sustained snowfall and freezing conditions occur, peat excavation should also be halted. The decision to restart work should be based on the thawing condition of the site and general meteorological conditions.
- Temporary storage and replacement of peat excavated from borrow pits should occur within the 'source' pit.
- Transport of peat on site from excavation to temporary storage and restoration site should be minimised.

8.13.3. Consistent inspection of peat conditions during construction and reinstatement will be undertaken by the Ecological Clerk of Works (ECoW), and in line with the CEMP, as follows:

- Temporary stockpiles will be inspected weekly. If non-compliance is noted, corrective actions must be taken; and
- Restored peat condition will be inspected during and immediately after reinstatement to ensure that best practice is followed.

8.14. Comparative Assessment

8.14.1. When compared to the Peat Balance produced for the Consented Development (2018 EIA), the overall estimated peat excavation for the Proposed Varied Development has increased from 105,034m³ to 107,568m³, a net increase of 2,534m³ (approximately 2.4%). Table 6 shows the estimated peat excavations for the Proposed Varied Development when compared with the Consented Development.

Table 6 - Comparative Assessment – Peat Balance

Item	Consented Development (2018 EIA) (m ³)	Proposed Varied Development (m ³)	Changes (m ³)	Percentage Change (%)
Peat Excavation	105,034*	107,568*	2,534	2.4%
Peat Re-Used	109,397	108,857	-540	-0.5%
Waste	-4,363	-1,289	-3,074	-70.5%

**Including 25% Bulking Factor, as per EIAReport_Volume4_Appendix11.1-11.3*

8.14.2. As shown in Table 6, the Consented Development estimated a total peat excavation of 105,034m³. The Proposed Varied Development estimates a total peat excavation volume of 107,568m³, which is an increase of approximately 2.4% against the Consented Development. With consideration to the increases to the infrastructure size of the Proposed Varied Development against the Consented Development outlined in Table 2, this represents a marginal increase in total peat excavation volume.

8.15. Conclusion

- 8.15.1. It is estimated that all 107,568m³ (bulked) of excavated peat will be re-used within the Proposed Varied Development.
- 8.15.2. When compared to the Peat Balance produced for the Consented Development (2018 EIA), the overall estimated peat excavation has increased by approximately 2.4% (2,534m³). Consistent with the Consented Development, the Proposed Varied Development will have no waste peat taken off site.
- 8.15.3. The Updated Preliminary PMP will be further developed into a Final PMP following detailed GI, including use of peat cores, as well as the detailed design of infrastructure, post-planning consent.

8.16. References

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