Appendix 4.2: Outline Construction Environmental Management Plan

Creachan Wind Farm

Environmental Impact Assessment Report
Volume 4: Appendices

Appendix 4.2: Outline Construction Environmental Management Plan
RWE Renewables UK Onshore Wind Ltd

Delivering a better world

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1. Introduction

1.1 Outline

This Appendix provides a framework for a Construction Environmental Management Plan (CEMP) that will be finalised pre-construction. This Outline Construction Environmental Management Plan (oCEMP) has been prepared by AECOM UK Ltd on behalf of the Applicant for the Proposed Development, located approximately 13 kilometres (km) northwest of Alness and 3.5 km north of Loch Morie. The document should be read in conjunction with the **EIAR Volume 2: Main Report and Figures,** which are referenced throughout this appendix.

The Proposed Development comprises:

- Up to 13 wind turbines consisting of 9 turbines with ground to tip heights up to 200 m and 4 turbines with ground to tip heights up to 180 m;
- Turbine foundations and associated crane pads and blade laydown areas;
- On-site access tracks (floating and excavated), passing places and turning heads;
- Temporary construction compounds;
- A temporary concrete batching plant area, located within a temporary construction compound;
- Control building and electrical substation;
- A Battery Energy Storage System (BESS);
- Underground cabling linking the turbines and BESS with the on-site substation;
- A permanent anemometer mast including associated foundations and hardstanding;
- New and upgraded watercourse crossings (including the potential replacement or bypassing of two existing single-span bridges along the Existing Forestry Access Track)
- Upgrade, widening and localised realignments of the Existing Forestry Access Track;
- Borrow pit(s) search areas;
- Habitat Management Areas (including areas of peatland restoration);
- Aviation lighting; and
- Micrositing allowance for all proposed structures and infrastructure of up to 100 m.

The location of the Proposed Development is shown in **Figure 1.1**, with the site plan for the Proposed Development detailed in **Figure 1.2**. Further details on the Proposed Development are provided in **Chapter 4: Project Description.**

The finalised CEMP will describe the environmental management and construction methods to be employed during the construction of the Proposed Development. This oCEMP will therefore be updated

with detailed information and finalised prior to the commencement of construction, in consultation with The Highland Council (THC) and other the relevant statutory consultees, taking account of the approved plans and relevant planning conditions.

The Contractor(s) appointed to construct the Proposed Development will prepare detailed method statements which will be incorporated into the final CEMP.

1.2 Objective of this Document

The requirement to produce a detailed CEMP, which is in accordance with the framework set out in this oCEMP, will form part of the contract for the construction works for the Proposed Development. The management measures, method statements and referenced good practice guidance and legislation will form the basis of the detailed design to be prepared by the Principal Contractor.

The finalised CEMP will provide:

- A schedule of all construction stage mitigation measures required to address likely potential significant effects identified in the EIAR;
- A schedule of all additional construction stage good practice management measures included as part of the proposed construction work, in line with industry good practice guidance;
- A schedule of roles and responsibilities for delivering the requirements of the CEMP, including a statement of responsibility to stop the job / activity if potential breach of a mitigation or legislation occurs;
- A method statement for monitoring / auditing, and templates for reporting and communication of environmental management performance on-site and with the Applicant, THC and other relevant parties;
- Construction stage environmental management measures, based on both compliance with relevant regulations and relevant good practice including, but not limited to:
  - The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR), and the requirement for Construction Site Licence (and Pollution Prevention Plan) (SEPA, 2021);
  - Forestry Commission (2023) UK Forestry Standard: The Government's approach to sustainable forestry, 5th Edition. Forestry Commission, Edinburgh;
  - NatureScot (2024) Good Practice During Wind Farm Construction, a joint publication by Scottish Renewables, NatureScot, Scottish Environmental Protection Agency (SEPA), Forestry Commission and Historic Environment;

  - Netregs, Guidance for Pollution Prevention (GPP)[1];
  - CIRIA Publications including CIRIA C768 (Guidance on the construction of SuDS), CIRIA C753 (The SuDS Manual); and
  - NatureScot (2015) Constructed Tracks in the Scottish Uplands, 2nd Edition.
- A template for the production of detailed and task / site specific plans for on-site components of the construction work.

A separate Decommissioning and Restoration Strategy will be prepared ahead of the decommissioning phase. This strategy will set out the decommissioning operations, environmental protection measures and restoration principles which would be implemented. This strategy will be agreed with the planning authority ahead of decommissioning.

2. The Proposed Development

2.1 Introduction

This section provides details of the location of the Proposed Development, relevant environmental matters as well as the details of construction methods and programming.

2.2 Project Description

The Development Site includes three main areas:

- the land within which the turbines and battery storage will be sited, referred to as the Main Development Area (MDA);
- areas of land without infrastructure; and
- the Existing Forestry Access Track area (within which some development is also required), as illustrated in **Figure 1.2.**

[1] It should be noted that as of the 17 December 2015, all Pollution Prevention Guidance (PPG) documents published by the UK environment agencies were withdrawn. The GPP documents were created to replace these and provide environmental good practice guidance for the whole UK, and environmental regulatory guidance for Scotland. Although the PPG documents provide useful advice on the management of construction to avoid, minimise and reduce environmental impacts, they should not be relied upon to provide accurate details of the current legal and regulatory requirements and processes. They remain good industry practice however, and are therefore referred to in this document, alongside other current guidance and in the context of scheme and site-specific mitigation measures.

The Development Site is approximately 2,558 hectares (ha) in size; however, the proposed MDA would occupy approximately 681 ha. The Existing Forestry Access Track connecting the U1057 and the MDA is approximately 12 km long and will be upgraded as part of the Proposed Development.

There are two landowners involved with the Proposed Development: Forestry and Land Scotland (FLS) and Glencalvie Estate. The Development Site currently comprises areas of forestry (both felled and restocked) outside the MDA.

The Development Site is located outside of national and international statutory designations for landscape and nature conservation; however, a northern section of the Development Site, including a part of the MDA, is located within the fringes of the Rhiddoroch – Beinn Dearg – Ben Wyvis Wild Land Area.

The residential receptors in close proximity to the Development Site are shown on **Figure 4.11**. The closest receptor to the MDA, Sonraichte, Kildermorie Estate, is located approximately 2.5 km from the MDA and 3 km to the southwest of the closest turbine (T11). There are two residential receptors within the southern extents of the Development Site, but outside of the MDA, at Inchlumpie. Scattered properties are located within the Strath Rusdale Valley, Kildermorie Estate and Diebidale River Valley.

Areas of long-established woodland (of plantation origin) (LEPO), as designated within the Ancient Woodland Inventory, are present within the Development Site (along the existing forestry access track which would be upgraded as part of the Proposed Development). These areas are predominantly planted with non-native species such as Norway spruce and Sitka spruce.

The Proposed Development includes a wind powered electricity generating station, comprising a maximum of 13 wind turbines, and a battery energy storage system (BESS). The turbines will comprise a tapered tubular steel tower and nacelle, containing the generator and associated equipment. These are attached to a hub and rotor assembly including three turbine blades. **Figure 4.1a** and **Figure 4.1b** provide illustrations of the indicative turbine model for a 200 m and 180 m tip height respectively. Turbines will be finished in a semi-matt grey colour.

Additional ancillary structures and infrastructure requirements are listed in **Section 5.5**.

It is proposed to construct approximately 17.5 km (including 7.2 km of floating track and 10.3 km of excavated track) of MDA Access Tracks to provide permanent access to turbine locations and other associated infrastructure across the Development Site. In addition, approximately 12 km of Existing Forestry Access Track will be upgraded, widened or subject to localised realignments.

The access tracks will be finished with crushed stone (Type 1 material or similar). Following construction, these tracks will be retained to provide access to the Proposed Development for operation and maintenance purposes.

The operational lifetime of the Proposed Development is 40 years. A time period of approximately 24 months will be required for construction and, following the operational period, a minimum of 12 months is expected to be required for decommissioning. The decommissioning will (subject to planning

conditions) involve the removal of the turbines and all above ground infrastructure of the Proposed Development, with the exception of access tracks.

2.3 The Consent

Post-consent, this section will be updated to provide an overview of the consent including relevant planning conditions.

The full details of the consent for the Proposed Development will be considered for the preparation of the final CEMP.

2.4 Construction Details

The construction of the Proposed Development is planned to be undertaken over a period of approximately 24 months, subject to award of consent and subsequent award of construction contract.

Construction will include the activities shown in the list below and indicative 24-month construction programme contained in **Table 1**. It should be noted that a number of activities will be undertaken simultaneously. The sequence of construction activities include:

- **Formation of temporary construction compounds**: Establishment of temporary facilities including the site offices, welfare facilities, lay down and storage areas, concrete batching plants, development of electricity and water supplies and erection of site signage, security fencing or hoarding, as required;
- **Creation of temporary quarries**: Opening of temporary borrow pits for the extraction and processing of aggregate for the construction of the Proposed Development.
- **Upgrade of Existing Forestry Access Track**: Upgrading of the Existing Forestry Access Track, including localised realignments and junction with the Ardross Road;
- **Formation of MDA Access Tracks**: creation of tracks connecting the infrastructure within the MDA;
- **Forestry Removal**: Removal and/or clear felling of forestry to allow widening of Existing Forestry Access Tracks and create areas for other associated infrastructure;
- **Excavations for turbine foundations**: Excavations for turbine foundations by mechanical plant;
- **Construction of turbine foundations**: Construction of turbine foundations will involve a combination of concrete and steel;
- **Construction of hardstanding / crane pads**: Formation of crane pads and laydown areas adjacent to each turbine location;
- **Construction of control building and substation**: Construction of buildings to house specialist electrical and control equipment, including delivery and installation of HV equipment;

- **Construction of BESS (including foundations)**: Delivery and installation of BESS units along with construction of BESS unit foundations;
- **Underground cable laying**: Installation of underground cabling between turbine locations and the substation compound and control building;
- **Turbine delivery and erection**: Delivery of all turbine components to the Development Site and erection of turbines. Typically, turbine erection will take 3-5 days per turbine; and
- **Commissioning and site reinstatement**: Testing and commissioning of turbines, substation and control building, BESS and electrical equipment (e.g. cables etc.), as well as reinstatement including removal of temporary infrastructure and facilities, landscaping and habitat restoration, where applicable.

Ahead of construction pre-construction surveys required to be undertaken in advance of construction and to inform detailed design, these will include, for example, GI (trial pits and bore holes), topographic surveys, etc.

2.5 Working Hours

The normal working hours would be as follows:

- Monday to Friday 0700 - 1900;
- Saturday 0700- 1600; and,

No construction working will be undertaken on Sundays or public holidays without prior written approval from THC. Out of hour deliveries may be required during the main construction period.

Maintenance works, emergency works and construction works outwith these specified hours will be limited to concrete pours, wind turbine erection, dust suppression, and the testing and commissioning of plant and equipment, unless otherwise approved in advance in writing by THC.

Heavy Goods Vehicles (HGVs) are permitted as follows:

- Monday – Friday 0700 – 1900; and
- Saturday 0700 – 1600.

Outwith these hours, HGV movements are to be limited to wind turbine delivery, unless otherwise approved in advance in writing by THC.

Any other out-of-hours deliveries would be subject to prior agreement with THC. The requirement for out-of-hours work could arise, for example, from delivery and unloading of abnormal loads or health and safety requirements, or to ensure optimal use is made of fair weather windows for the erection of turbine blades and the erection and dismantling of cranes.

2.6 Construction Programme

Table 1 Construction Programme

Activity	Month																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Civil Construction																								
Formation of temporary construction compounds																								
Creation of small temporary quarries																								
Upgrade of Existing Forestry Access Track																								
Upgrade and formation of the new access tracks																								
Forestry removal																								
Excavations for turbine foundations																								
Construction of turbine foundations																								
Construction of hardstandings / crane pads																								
Construction of substation and control building																								
Electrical Construction																								
Underground cable laying																								
Installation of switchgear and transformers																								
Turbine Erection																								
Turbine delivery and erection																								
Battery Storage																								
Enabling works																								
Battery Installation																								
Battery Commissioning																								
Commissioning and site reinstatement																								
Commissioning and site reinstatement																								

3. Roles and Responsibilities

This section provides a description of the roles and responsibilities of the parties and in particular key staff involved in the construction of the Proposed Development. Additional roles and responsibilities may be added post-consent.

The project specific environmental responsibilities for the Principal Contractor's Project Manager are to:

- Manage and communicate the overall environmental performance on the contract.
- Ensure all relevant persons in a position of responsibility are suitably trained and competent in environmental matters to implement the requirements of the Applicant and the Appointed Contractor.
- Manage the effectiveness of environmental management support to Operations.

The Construction Managers and Site Engineers for the Appointed Contractor are responsible for:

- Implementing the company Management Systems and relevant procedures.
- Ensuring the sites under their control meet the environmental standards set by the company.
- Implementing site specific management plans, requirements and methods statements.
- Ensuring adequate environmental instruction is given to those employees and contractors under their control.
- Requesting advice and support from the Appointed Contractor Project Manager and Environmental Advisor.

Construction Foremen and Supervisors (or similar) are responsible for:

- Communicating the site-specific environmental requirements to their teams.
- Ensuring site specific controls are implemented.
- Ensuring that sites under their control do not cause pollution, comply with the ecological restrictions, as well as the other site controls required for waste, water, air and noise.
- Communicating the environmental site briefings, toolbox talks and other environmental / community requirements to operatives, subcontractors and delivery drivers.
- Raising environmental observations or concerns to the environmental team or their manager.

The Project Environmental Advisor is responsible for:

- Ensuring the Project Manager is aware of project specific environmental constraints.
- Providing environmental support to the project team, deliver environmental training and ensure induction material includes project specific environmental issues.

- Managing the contract specific environmental systems.
- Liaising with the Applicant and regulators on project level environmental management issues.
- Attending any environmental stakeholder meetings where required to do so.
- Managing the progress of environmental projects, tasks and actions in conjunction with the project.
- Writing, issuing and updating environmental documentation, including Environmental Plans.
- Preparing environmental documentation for operations during the planning of the work.
- Providing support and advice on environmental issues to Operations on site and manage specialist environmental subcontractors and service providers.
- Liaising with the Applicant, regulators and Operations to actively find solutions to environmental issues on site.
- Implementing a programme of and performing environmental inspections on site, investigating incidents, issuing corrective actions and monitoring their close out.
- Ensuring the operations on site follow this environmental management plan, procedures and all legal, company or Applicant requirements.
- Seek ways, where practical to do so, to reduce waste generation, improving opportunities to recycle material whilst identifying opportunities to use recycled materials where possible.

The Head of Environmental and Sustainability is responsible for:

- Providing support to the Project Environmental Advisor including (but not limited to) liaising with the Applicant and regulators on project level environmental management and sustainability issues.
- Ensuring that the Environmental Advisors are organised to deliver effective environmental support to Operations.
- Setting the priorities and objectives of the Environmental Advisors, including performance improvements and initiatives.
- Managing the reporting of environmental and sustainability performance.
- Providing support in attending any environmental stakeholder meetings where required to do so.
- Organising training and supporting auditing programmes.

4. Communications, Reporting and Training

4.1 Communications

The Principal Contractor will liaise with the relevant THC departments regarding the construction programme. The Principal Contractor will be responsible for notifying THC of changes to the programme, within a minimum of 7 days of the required change being known.

The Ecological Clerk of Works (ECoW) will be responsible for liaison with THC, the Energy Consents Unit and all consultees such as NatureScot, FLS and Historic Environment Scotland regarding the environmental management of the Proposed Development.

The Applicant will be responsible for all press related matters.

4.2 Inductions and Training in Environmental Requirements

The Principal Contractor will ensure all employees, sub-contractors, suppliers, and other visitors to the Development Site receive induction training. This will include a summary of environmental risks associated with the Proposed Development and the Applicant's environment rules and policies, specifically those relevant to the inductee. Topics that will be addressed will include pertinent areas of environmental sensitivity, such as ecological, archaeological, hydrological or geological sensitive areas, in addition to pollution prevention of the water environment, ground stability and peat slide risk, and waste management.

The Principal Contractor will ensure all personnel are suitably trained on general site good practice and emergency procedures, including the use of spill kits, silt mitigation and concrete washing out. To ensure all staff are suitably trained on such procedures, training will be provided by a suitably qualified person on a regular basis. The Principal Contractor will keep a record of this training. Details of the proposed training will be provided to the Applicant prior to commencement of construction works.

Toolbox talks will be provided by the ECoW (or other relevant specialist such as archaeological clerk of works) throughout the construction of the Proposed Development, to provide on-going reinforcement and awareness training of environmental method statements, which identify the sensitive receptors and provide advice on any specific procedures that need to be followed and the mitigation measures that should be implemented. Prior to works starting on the Development Site, the programme of talks to be undertaken will be agreed by the Principal Contractor. Additional toolbox talks may be required outside of this based on circumstances such as unforeseen risks, repeated observation of bad practices, perceived lack of awareness, pollution event, etc. A record of all toolbox talks addressing highlights of the meeting and attendees will be maintained.

4.3 Environmental Management Reporting

Regular reporting of environmental management will be undertaken for the duration of construction of the Proposed Development. **Table 2** outlines the reporting tasks that are expected to be undertaken and example of how these could be implemented. Prior to the commencement of construction, the Principal Contractor, in consultation with the ECoW, shall agree exact reporting requirements. Monthly reports will be provided to both the Applicant and THC.

Table 2 Environmental Management Reporting

Task	Summary of Requirements (Examples)	Responsibility (Examples)
Daily Reporting	Daily report following set proforma for highlighting sensitive environmental receptors and impacts.	Contractor
Weekly Reporting	Weekly report summarising key incidents over the previous week. Including actions taken and lessons learnt.	Site manager
Monthly Audits	Monthly audits summarising compliance with environmental legislation, good practice and development specific requirements. Including details on who is responsible for implementing each action and the associated timescales. Corrective and preventative actions being monitored in an Audit Close-out Schedule.	ECoW / Site Manager
Environmental Monitoring Report	Pre-construction surveys, etc	ECoW
Serious Incident Reporting	Any serious incident relating to health and safety or environmental obligations relating to the Proposed Development.	ECoW / Site Manager

4.4 Incidents and Near Misses

The Principal Contractor will maintain a register of all environmental incidents or near misses, with each supported by an Environmental Incident Report Form. This will document the nature, date and time of the incident, corrective action(s) taken, and details of any contact with regulatory agencies. All incidents will be reported to the Applicant on the day that they occur. The register will be reviewed at regular intervals and reported on at team meetings.

After an incident, any lessons learned will be communicated to all of the staff involved in the Proposed Development. The appropriate action will be implemented elsewhere on the Proposed Development if necessary. All relevant method statements, sections of the CEMP, toolbox talks, etc., will be updated and all of the staff involved in the Proposed Development will be informed of the changes.

The staff involved in the Proposed Development will be briefed on the system for reporting incidents and near misses as a part of their Site Induction.

4.5 Grievance Mechanism

A dedicated contact number for local residents to phone should they have any queries or complaints, will be maintained and advertised on boards at the entry to the Development Site during the construction works. A log will be kept of all complaints, along with the actions taken to resolve them, for the duration of the works. Details of any complaints will be made available to the ECoW and any relevant consultees. The Applicant will endeavour to ensure any complaints received will be acknowledged within 24 hours.

5. General Environmental Management Requirements

5.1 Introduction

This section provides a description of the general environmental management measures to be implemented during the construction of the Proposed Development.

5.2 Environmental Management, Mitigation and Monitoring

Construction phase mitigation as identified in the EIAR will be undertaken as part of the CEMP. The construction phase management, mitigation and monitoring identified in the EIAR is contained in **Chapter 15: Schedule of Mitigation** and may be updated during the consenting process for the s.36 application of the Proposed Development. The final version of the Schedule of Mitigation will therefore be appended to the finalised CEMP and will be updated to include the relevant planning conditions issued as part of the consent and to assign roles and responsibilities to each task.

The Applicant is committed to ensuring that all identified management, mitigation and monitoring will be implemented during the construction phase.

Before construction commences, procedures to facilitate regular monitoring and reporting will be developed which, in combination with the monitoring already identified as part of the CEMP, will enable identification of any impacts arising from the construction activities, as well as demonstrating compliance with regulatory conditions and identifying where corrective actions may be required.

5.3 Construction Method Statements

The Principal Contractor will be responsible for producing Construction Method Statements (CMSs) for the crane pads, turbine foundations, cable trenches, watercourse crossings and wind turbines. These statements will be produced post-consent once a Principal Contractor is appointed and before the commencement of any construction works.

The CMS will be included as appendices to the final CEMP.

5.4 Construction Planning

Construction will be planned in such a way as to ensure construction activities are undertaken in a timely manner while minimising environmental risk, e.g. seasonal sensitivities or inclement weather will be considered in the construction programme. Construction activities may be undertaken simultaneously at more than one area of the Development Site. The work programme will be agreed with THC prior to works commencing on site. Where the programme changes significantly this shall be communicated to THC.

Construction activities will be scheduled so that works that have the potential to impact upon ecological receptors are conducted outside key seasonal sensitivities, e.g. vegetation clearing will be conducted outside of the breeding bird season. Species specific information will be provided in Section 6 of this CEMP.

Construction activities shall also be scheduled, where possible to reduce the risk of pollution. Measures include:

- Minimising the periods for which soils are exposed and stockpiled thereby reducing the risk of generating silt laden runoff;
- Avoiding, where possible, undertaking specific activities such as earthworks during prolonged and heavy rainfall thereby reducing the risk of sediment or pollutants becoming entrained in excess runoff; and
- Avoiding, where possible, undertaking works in closer proximity to watercourses where water levels are higher and adjacent land is at risk of flooding.

5.5 Site Management

The layout of temporary construction facilities will be developed by the Principal Contractor in consultation with THC. Infrastructure inherent with site construction compounds, such as access points, roads, lighting, location of generators and welfare facilities, will be located so as to, for example, minimise impacts of dust, noise and lighting on the environment and local sensitive receptors, including residential dwellings.

The construction compound and areas for the storage of all materials, including paints, sealants or other chemicals, will be located at least 50 m away from surface water bodies in a secure container within the temporary site construction compound. All construction materials will be stored in accordance with the appropriate regulatory requirements, including the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended).

Site compounds and laydown areas will require regular inspection and maintenance, including appropriate storage of materials, litter picks and general housekeeping to ensure health and safety risks as well as environmental considerations, are appropriately managed.

Wheel wash facilities or rumble cleaners will be provided within the construction compound and work site where appropriate, adequate provision for drainage via settlement tanks and regular maintenance of settlement tanks, or other appropriate facilities, during the specified working hours.

6. Species Protection Plans

Site-specific Species Protection Plans will be prepared prior to undertaking construction activities, informed by the findings of pre-construction surveys. They will identify requirements for good practice, specific-mitigation and protected species licensing.

These Species Protection Plans will be added to this section of the CEMP when it is finalised pre-construction.

7. Draft Groundwater Dependent Terrestrial Ecosystems Management Plan

7.1 Introduction

The aim of this draft Ground Water Dependant Terrestrial Ecosystem (GWDTE) Management Plan is to ensure that where occurring within the Development Site, GWDTEs are identified, with their presence and sensitivity to construction impacts effectively communicated to site personnel and they are given due protection throughout construction.

To avoid impacts to sensitive wetland habitats, including GWDTEs, this Management Plan details the environmental management and mitigation measures to be implemented during construction, with the overall aim to ensure effective protection of GWDTEs.

This section should be read in conjunction with **Chapter 13: Geology, Hydrology, Hydrogeology and Peat** and **Appendix 13.5: GWDTE Assessment** of the EIAR.

Prior to construction, this section will be updated to reflect any relevant planning conditions and any other relevant information.

7.2 GWDTE Management and Mitigation

Micro-siting to Avoid GWDTEs

The GWDTE Assessment **Appendix 13.5** concluded there is one habitat which is potentially a GWDTE (Acid Neutral Flush). Ten localised areas of Acid Neutral Flush habitats were identified within 250m of the proposed infrastructure, however potential impacts resulting from the Proposed Development were assessed as 'Low'.

It is recognised that the micro-siting of Proposed Development infrastructure can play a crucial role in avoiding impact to sensitive ecological features, including GWDTEs. During construction, micro-siting will be informed by pre-commencement surveys undertaken by the ECoW, to identify (and where possible aim to avoid impact to) the identified GWDTEs and other sensitive habitat features within the Development Site. Where GWDTEs are identified within or immediately adjacent to the working area, the ECoW will advise on the micro-siting of infrastructure limits from the GDWTE.

GWDTEs Located within Micro-siting Limits

Where it is unavoidable for a GWDTE to be located within micro-siting limits, careful site selection, design and construction practices will be undertaken to minimise disturbance to the hydrological baseline conditions. This will involve monitoring and maintaining where flows and water levels within the GWDTE will be to reduce impacts and protect the GWDTE as best possible. Planned work within the GWDTE will be discussed and approved by THC and SEPA before construction commences. No activities will be undertaken unless previously approved in writing.

In addition, construction activities within the GWDTE will be kept to essential activities only with activities undertaken outside of the GWDTE where possible before being bought 'on to site', for example concrete mixing and storage / laydown areas. There will be no storage of chemicals or materials within the GWDTE, no direct discharges and activities should be supervised by ECoW.

General Mitigation to Protect GWDTEs

Track Construction

To preserve local hydrology and to maintain existing hydrological process associated with GWDTEs, SUDs will be incorporated into the track design, with installation of intercepting ditches in areas where sloping ground is crossed.

If the construction of floating roads is required on sloping ground, it is recognised that a floating road may inadvertently create a barrier to natural surface water flow. This may result in drainage problems, relating to the retention of surface water against the uphill side of the road. In such circumstances, good practice guidance recommends intercepting the surface water before it reaches the road, with diversion to a culvert where it can then be directed through the floating road to downslope habitats. Where intercepting ditches are required to achieve this, these will be designed to have minimal effect on local hydrology.

To avoid settlement and a reduction of buoyancy (of the floating road), intercepting ditches will be positioned sufficiently away from the road, to minimise drawdown of the water table (below the road) and any consequential settlement. Ditch depth should be minimised where possible, to minimise the effects of localised lowering of groundwater levels and the potential for inadvertent impacts to any adjacent GWDTEs. Unless required for long term drainage management of infrastructure, all intercepting ditches will be reinstated as part of completion of construction.

Drainage Management

The following management and mitigation measures will be incorporated into the site drainage design by the Principal Contractor, where appropriate:

- Interception of natural hydrological flows (both surface and ground water) will be avoided, unless agreed in advance with SEPA;
- Site drainage will be designed to encourage diffuse movement of water across the Development Site, with the aim to preserve local hydrology and prevent mobilisation of sediments. Where release of surface water is required (e.g. following treatment of construction run-off), this will discharge be designed in accordance with good practice guidance, to minimise potential for scour;
- Drainage plans will not allow direct contaminated ditch discharge into sensitive habitats, including watercourses and potential GWDTEs;
- Where surface run-off from infrastructure is collected, appropriate treatment will be undertaken prior to release, to protect sensitive habitats including watercourses and potential GWDTEs from pollution; and
- Additional mitigation to ensure effective drainage and protection of GWDTEs during construction may include the following measures: silt traps, silt fencing, straw bales, check dams, flocculant dosing and pumping (to avoid significant build-up of water). Additional mitigation will be deployed on a location specific basis, taking ground conditions and construction requirements into account, in accordance with good practice guidance.

General Mitigation Measures

In addition to the above, the following mitigation will be implemented where deemed appropriate:

- Temporary peat storage areas will be selected to avoid GWDTEs. Generally, a buffer of 100 m between peat storage areas and GWDTEs will be allowed.
- Cross-drains will be installed in access tracks to maintain hydrological connectivity in GWDTEs, particularly in areas of wet grassland, bog and flush. Cross-drains will also prevent surface water flow (on access tracks) from scouring track surfaces and forming of runnels, therefore avoiding inadvertent dispersal of run-off into surrounding habitats. Where installed as a series of cross-drains to intercept surface water flow on tracks, surface water will be diverted into side-ditches, preventing the build-up of flow;

- Should habitats be located directly within the Proposed Development footprint and working area, measures will be taken to minimise long term impacts, through restoration of affected areas to an original condition where possible. Turves will be removed and carefully set aside (vegetation side up), for re-use in re-profiling and reinstatement works. Turves will be cut to a depth sufficient for maintenance of plant root systems, with storage of turves adjacent to each other, vegetation side up (i.e. not stacked). Stripped soils should be used as soon as possible following removal, ideally with the replacement of whole turves to give the vegetation a sufficient chance of early regeneration; and
- At all times during construction, pollution prevention and control measures, environmental risk management and emergency environmental incident planning will be undertaken, to ensure effective environmental management.

8. Pollution Prevention Plan

8.1 Introduction

This Pollution Prevention Plan (PPP) sets out the measures to be implemented to protect the ground and water environment and ensure that the Proposed Development does not result in significant impacts on surface and ground water resources.

8.2 Pollution Prevention Plan

General Requirements

Pollution Prevention measures should consider the following guidance documents and relevant industry standard good practice at the time of construction:

- CIRIA Report C811: Environmental Good Practice on Site, Fifth Edition (CIRIA, 2023);
- CIRIA Report C532: Control of Water Pollution from Construction Sites (CIRIA, 2001);
- The Control of Substances Hazardous to Health regulations 2002;
- GPP 1 – Understanding your environmental responsibilities – good environmental practices (SEPA, 2021);
- GPP 2 – Above ground oil storage tanks (SEPA, 2021);
- GPP 3 – Use and design of oil separators in surface water drainage systems (SEPA, 2022);
- GPP 5 – Works and maintenance in or near water, version 1.2 (SEPA, 2018);
- GPP 6 – Working at construction and demolition sites (SEPA, 2023);
- GPP 8 – Safe storage and disposal of used oils (SEPA, 2021);

- GPP 13 – Vehicle washing and cleaning (SEPA, 2021);
- GPP 19 – Vehicles: Service and Repairs (SEPA, 2021);
- GPP 21 – Pollution incidence response planning (SEPA, 2021); and
- GPP 22 – Dealing with spills (SEPA, 2018).

Storage of Chemicals Fuels and Oil

Contactors and sub-contractors shall be required to follow SEPA's relevant GPPs and PPGs and pollution control measures incorporated into the CMS.

Fuel will be required for the vehicles, generators and other equipment on-site. This would be stored within the temporary construction compound, with storage typically consisting of a lockable, bunded fuel tank and a separate lockable housing for the storage of construction chemicals within a containment bund with 110 % storage capacity.

Movement, Parking and Re-fuelling of Vehicles and Plant

There will typically be a wheeled, bunded bowser for the transport of fuel to tracked vehicles away from the construction compound. Drip trays shall be used when refuelling vehicles on the Development Site.

Emergency Spill Response

Emergency spill kits shall be kept adjacent to the fuel storage area and also provided in large items of plant and with the mobile bowser. The contractor shall have a contract with a 24-hour emergency response company who will be on standby in the event of a spillage incident.

Silt Control

An on-site drainage system will be installed to collect natural overland flows before they reach access tracks. Flows will be transferred under the tracks and discharged through silt fences (or similar filtration) to natural ground downstream.

Pollution from run-off from access tracks and watercourse crossings will be reduced by brushing or scraping roads to reduce dust and mud deposits and by installing small dams in artificial roadside ditches to retain silt. Where possible, work will be conducted an appropriate distance from the bank and not in the river (GPP 5, SEPA 2018).

Any pumped water associated with construction activities will be directed via silt fences towards natural ground.

Pollution Monitoring and Record Keeping

The Applicant will implement a monitoring regime which will focus on Safety, Health and Environment (SHE). Monitoring will be undertaken by the Applicant and lead by their appointed SHE Manager. These audits will be held on a regular basis and will be scheduled to coincide with key construction phases. A

frequent monitoring regime by the Applicant will ensure that the contractor is working in compliant with the CEMP.

8.3 Summary of Requirements

Table 3 provides a summary of the pollution and prevention requirements including the responsibilities of the parties involved in the Proposed Development.

Table 3 Pollution Prevention Plan – Summary of Requirements

Party	Responsibilities & Requirements
Applicant	Appointment of Independent ECoW. Undertaking appropriate monitoring during construction.
ECoW	Undertaking appropriate monitoring during construction. Briefing contractor on specific pollution prevention measures.
Principal Contractor	Assisting the ECoW with implementation of pollution prevention measures. Ensuring that the PPP, CMS and CEMP is adhered to.

9. Peat Management Plan

A Peat Management Plan (PMP) will be prepared to guide the handling, storage and reuse of peat during construction of the Proposed Development. The PMP sets out measures to minimise peat disturbance, prevent unnecessary excavation and reduce carbon release in accordance with SEPA guidance and best-practice.

An outline PMP (oPMP) is provided in **Appendix 13.4**. Prior to construction, the oPMP will be revised and a final PMP will be developed and agreed with the planning authority.

10. Dust Management Plan

10.1 Introduction

This Dust Management Plan sets out measures for protecting air quality and minimising the dispersal of dust during construction activities.

Relevant Conditions

Conditions have not yet been agreed. The final CEMP will be updated once these are made available and any relevant conditions to pollution prevention will be referenced.

Site and Project Description

Any specific mitigation will be informed by the final detailed design of the Proposed Development. However, good practice principles for dust management have been considered ahead of the post-consent stage Dust Management Plan.

The following good practice guidance will be supplemented with any specific mitigation in the final CEMP:

- No bonfires on site;
- Plan site layout by locating dust producing activities away from sensitive receptors;
- Regular cleaning of site entrances;
- Damping down of the access tracks during prolonged dry periods, where there is the potential for nuisance dust;
- Provision of wheel washing or rumble strip facilities to prevent mud from construction operations being transported on to adjacent roads, where there is the potential for nuisance dust;
- Restriction of vehicle speeds on haul roads and other un-surfaced areas of site;
- All vehicles to switch off their engines when not in use (i.e. no idling vehicles);
- Ensure that dusty materials are stored, handled and transported appropriately;
- Minimise dust generation activities on windy and dry days; and
- Appropriate dust monitoring on site to inform site management of the success of dust control measures.

10.2 Summary of Requirements

Table 4 provides a summary of the dust management requirements including the responsibilities of the parties involved in delivering the Proposed Development.

Table 4 Dust Management – Summary of Requirements

Party	Responsibilities & Requirements
Applicant	Appointment of Independent ECoW.
ECoW	Undertaking appropriate monitoring during construction. Briefing contractor on specific dust mitigation measures.
Principal Contractor	Assisting the ECoW with implementation of dust mitigation. Ensuring that the Dust Management Plan is adhered to.

11. Drainage Management Plan

11.1 Introduction

This Drainage Management Plan (DMP) sets out the measures to be implemented to protect the water environment and ensure that the Proposed Development does not result in significant impacts on surface and ground water resources.

Relevant Conditions

Conditions have not yet been agreed. The final CEMP will be updated once these are made available and any conditions relevant to drainage management will be referenced.

Site and Project Description

Drainage requirements will be considered post-consent at the detailed design stage. However good practice principles and mitigation measures for drainage management have been considered ahead of the post-consent stage and are set out below.

11.2 Drainage Management Plan

General Requirements

All construction works will be undertaken following the guidance contained within CIRIA Document C692 “Environmental Good Practice on Site” and the following GPPs:

- GPP 1 – Understanding your environmental responsibilities – good environmental practices (SEPA, 2021);
- GPP 2 – Above ground oil storage tanks (SEPA, 2021);
- GPP 3 – Use and design of oil separators in surface water drainage systems (SEPA, 2022);
- GPP 4 – Treatment and disposal of wastewater where there is no connection to the public foul sewer (SEPA, 2021);
- GPP 5 – Works and maintenance in or near water (SEPA, 2018);
- GPP 6 – Working at construction and demolition sites (SEPA, 2023);
- GPP 8 – Safe storage and disposal of used oils (SEPA, 2021);
- GPP 13 – Vehicle washing and cleaning (SEPA, 2021);
- GPP 19 – Vehicles: Service and Repair (SEPA, 2021);
- GPP 20 – Dewatering underground ducts and chambers (SEPA, 2021);
- GPP 21 – Pollution incidence response planning (SEPA, 2021);

- GPP 22 – Dealing with spills (SEPA, 2018);
- GPP 26 – Safe storage – drums and intermediate bulk containers (SEPA, 2021); and
- GPP 27 – Installation, decommissioning and removal of underground storage tanks (SEPA, 2022).

All construction activities will be undertaken in accordance with the CAR Regulations (as detailed in **Chapter 13 Geology, Hydrology, Hydrogeology and Peat** of the EIAR). The CAR Regulations introduce three levels of authorisation for activities which could affect the water environment; General Binding Rules (GBRs), Simple Licence and Complex Licence. As a minimum all construction activities will be undertaken in accordance with the relevant GBRs.

From 1 November 2025, all water, waste management and industrial activities are now regulated under the Environmental Authorisation (Scotland) Regulations 2018 (EASR) as amended. This means that all activities authorised under EASR, all permits, registrations, notifications and changes to any existing authorisations will need to be applied for under the new Regulations. For EASR activities covered by General Binding Rules (GBRs), the rules will need to be complied with.

Drainage System Design Principles

Site Drainage System will comply with the following principles:

- All construction site drainage measures will be developed in consultation with SEPA prior to the commencement of construction.
- The drainage system will not discharge directly to any waterbody but will discharge to appropriately sited buffer strips or trenches, preferably on flat ground. The buffer strips will act as filters, minimising sediment transport, attenuating higher velocity flows and maximising infiltration.
- During construction a range of temporary measures will be put in place to manage surface and groundwater flows and prevent pollution. These will be developed in detail prior to construction and may include silt traps, settlement ponds and buffer strips as required.
- Where requires, temporary interception bunds including silt fences and/or matts and straw bales will be installed upslope and downslope of excavations and stockpiles in order to intercept surface water runoff, trap entrained / suspended sediment and reduce ingress of water to excavations.
- Access tracks crossing slopes may potentially disrupt surface flow. Cross-drains will be constructed at regular intervals to conduct this surface flow beneath the road where it will be discharged from the drainage system. Regular discharge points will limit the concentration of surface runoff and prevent the diversion of flows between sub-catchments.
- Artificial drainage will only be installed where necessary. The individual lengths, depths and gradients of these drains will be minimised to avoid intercepting large volumes of diffuse overland flow and generating high velocity flows during storm events.

Project Specific Requirements

Runoff from the construction works will not be allowed to enter watercourses directly. Appropriate drainage, runoff collection and treatment will be identified post-consent and implemented before and during construction. As part of preparation of the detailed DMP, the ECoW and project hydrologist will undertake a review of design and drainage plans to inform the requirement for micro-siting, to minimise the potential for impacts to habitats of conservation concern.

Mitigation

Areas of the temporary compound which are considered to present an increased pollution risk, such as fuelling or oil storage areas, shall be equipped with double-skinned or bunded fuel tanks compliant with relevant British Standards. Tanks shall be located away from drains, watercourses, and environmentally sensitive areas.

Drainage from low pollution risk areas such as site offices will be managed in line with SEPAs guidance.

Foul effluent generated from temporary toilet facilities would be treated either by septic tank with soakaway or by the use of self-contained chemical facilities which would be periodically removed for off-site disposal.

Pre-construction drainage will be installed to ensure natural drainage pathways are preserved as closely as possible and not mixed with construction drainage.

Swales will be created during access road construction as well as regular cross drains to collect construction drainage and route it through appropriate treatment systems (if required) before discharging to natural ground. Swales and interception ditches will generally be shallow to avoid altering the natural ground water pathways or lower the natural water table.

This DMP will be updated post-consent, at the detailed design stage in consultation with SEPA. A site drainage plan will also be produced in line with the criteria set out in GPP 21 (SEPA, 2021) and attached as an appendix to the final CEMP.

11.3 Summary of Requirements

Table 5 provides a summary of the drainage requirements, including the responsibilities of the parties involved in the Proposed Development's construction.

Table 5 Drainage Management Plan - Summary of Requirements

Party	Responsibilities & Requirements
Applicant	Appointment of Independent ECoW. Provision of relevant survey reports and other materials prepared during pre-construction stages of the Proposed Development.
ECoW	ECoW will be responsible for ensuring the implementation of the DMP.

	Undertaking appropriate monitoring during construction. Undertaking consultation with SEPA as required. Establishing protection zone as required. Briefing contractor on specific drainage management requirements.
Principal Contractor	Assisting the ECoW with implementation of mitigation. Ensuring that the DMP is adhered to.

12. Watercourse Crossing Register

12.1 Introduction

This section contains the watercourse crossing register and sets out good practice and Proposed Development specific management of watercourse crossings. This section should be read on conjunction with **Chapter 13: Geology, Hydrology, Hydrogeology and Peat** and **Appendix 13.1: Watercourse Crossing Strategy** of the EIAR.

Relevant Conditions

Conditions have not yet been agreed. The final CEMP will be updated once these are made available and any conditions relevant to drainage management will be referenced.

Site and Project Description

A number of watercourses are present across the Development Site, and drain either from north-west to south-east into Black Water, or south into Abhainn na Glass and Loch Morie. The MDA Access Tracks have been routed in order to avoid areas of deeper peat, as well as to reduce the potential effects on watercourses where possible, minimising the number of crossings.

A total of 32 crossings would be utilised, of which 15 would be new crossings and 17 existing. The full description of each crossing and details of their locations is provided in **Appendix 13.1: Watercourse Crossing Strategy** of the EIAR.

12.2 Watercourse Crossing Register

General Requirements

Ground investigations (GI) following receipt of planning permission will confirm soil and rock properties to assist the detailed design. Watercourse crossing designs will also be confirmed during the ground investigation. Watercourse crossings will be designed such that they do not restrict water flow, hinder the passage of mammals along the banks, or form a barrier to fish migration. They will be sized to accommodate 1:200 year flows and include an allowance for increased flows due to climate change.

Any watercourses which require a culvert diameter >2 m shall be bottomless culverts. Measures shall be put in place in order to minimise disturbance of substrate material and silt pollution.

Design and construction of all temporary and permanent watercourse crossings will comply with the following:

- All work will be undertaken in accordance with the requirements of the CAR Regulations (as listed in **Chapter 13 Geology, Hydrology, Hydrogeology and Peat** of the EIAR. All necessary authorisations will be obtained as required.
- Watercourse crossings will be designed and constructed taking into account the guidance contained within WAT-SG-25 Engineering in the Water Environment: Good Practice Guide, River Crossings (SEPA, 2010).
- Where works require temporary working within surface waters, all activities shall be undertaken in accordance with the guidance contained within GPP 05: Works and Maintenance Near Water (SEPA, 2018).

Project Specific Requirements

Mitigation relating to watercourse crossings identified within the EIAR will include:

- A CMS, in line with Good Practice during Wind Farm Construction guidance (NatureScot, 2024), will be produced in consultation with SEPA and THC. The CMS will detail silt management methods including at watercourse crossings.
- Watercourse crossing works will be avoided after heavy rainfall events as far as is practicable.
- Pollution from watercourse crossings will be reduced by brushing or scraping roads to reduce dust and mud deposits and installation of small dams in artificial roadside ditches to retain silt. Where possible, work will be conducted an appropriate distance from the bank and not in the river.

The Watercourse Crossing Register with the location, description and justification of each of the proposed watercourse crossings is contained within **Appendix 13.1: Watercourse Crossing Strategy** of the EIAR. The register will be updated post-consent with finalised descriptions included once detailed design is confirmed.

12.3 Summary of Requirements

Table 6 summarises the requirements of the different parties involved in the construction of the Proposed Development in relation to the Watercourse Crossing Register.

Table 6 Watercourse Crossing Register - Summary of Requirements

Party	Responsibilities & Requirements
Applicant	Appointment of Independent ECoW.

	Provision of relevant survey reports and other materials prepared during pre-construction stages of the Proposed Development.
ECoW	Undertaking consultation with SEPA as required. Briefing contractor on specific drainage management requirements.
Principal Contractor	Production of Construction Method Statement.

13. Borrow Pits

13.1 Introduction

The section sets out good practice methods for the construction, operation and restoration of temporary quarries at the Development Site.

Relevant Conditions

Conditions have not yet been agreed. The final CEMP will be updated once these are made available and any conditions relevant to drainage management will be referenced.

Borrow Pit Description

An estimated 165,000 m³ of stone aggregate material will be required for the construction of the Proposed Development.

It is anticipated that up to eight temporary borrow pits (BP) can be developed within the Development Site to source the aggregate material. The proposed locations of the eight borrow pit search areas are shown in **Figure 1.2** of the EIAR and details of each of the BP search areas are provided in **Table 7**.

The BP search areas will be subject to detailed GI and the exact design of the BPs determined following award of consent for the Proposed Development. A 100 m micro-siting tolerance has been proposed to allow for unforeseen ground conditions.

Following the completion of construction activities, the BPs will be reinstated using excess spoil generated during the works and with peat, as set out in **Appendix 13.4: Outline Peat Management Plan** of the EIAR.

Table 7 Borrow Pit Search Areas

BP No.	Coordinates		Length (m)	Width (m)	Depth (m)
	Easting	Northing			
1	254475.3	878322.7	270	210	3
2	252904	882706.8	200	200	3
3	252148.2	882444.9	100	100	3

BP No.	Coordinates		Length (m)	Width (m)	Depth (m)
	Easting	Northing			
4	251198.2	883160.9	50	50	3
5	250206.1	883448.5	100	100	3
6	249887.7	883057.1	50	50	3
7	252714.7	881010.5	100	100	3
8	253363	881015.1	100	100	3

13.2 Borrow Pit Assessment

General Requirements

Design and works within borrow pits will comply with the following:

- All work will be undertaken in accordance with the requirements of The Quarries Regulations 1999 and Good Practice During Wind Farm Construction (NatureScot, 2024) All necessary authorisations will be obtained as required.
- Should blasting be required, the following is also applicable; Planning Advice Note 50: Controlling the Environmental Effects of Surface Mineral Workings (PAN 50) (The Scottish Office Development Department, 1996), Section 72 of Control of Pollution Act 1974.

Project Specific Requirements

The construction method for the borrow pits is outlined in **Table 8**.

Table 8 Borrow Pit Construction Method

Ref	Activity	Notes for Consideration
1	Set out the site tracks with the use of GPS (RTK) equipment.	The Principal Contractor shall ensure that markers which are to be used for setting out purposes are not harmful to the environment i.e. untreated wooden pegs or similar – Paints or other manmade materials shall not be used for setting out operations.
2	Set out and install SuDS features, primarily the swale located at the small temporary quarry entrance.	In areas of peat only low ground pressure plant and equipment and breakers will be used to minimise the impact on the vegetation layer. SuDS will ensure that any suspended solids generated during the construction stage are effectively mitigated.
3	Remove and locally store the top layer of vegetated material around the crest of the small temporary quarry face.	This material will be stored for re-use to cover and promote natural re-vegetation of the peat and /or inorganic spoils that may arise. Whilst stored the material will form a bund around the crest of the working faces, diverting surface water flow

Ref	Activity	Notes for Consideration
		away from the face and towards the small temporary quarry floor.
4	Excavate to rockhead level and remove any excess material.	If suitable, this material will be re-used as general backfill. Otherwise, the material will be deposited at the locations specified within the spoil management plan and will be sealed with a vegetated layer.
5	Where ripping proves unsuitable, establish a first line blast to form a productive face. Utilise pattern blasting to extend the small temporary quarry in the desired formation.	Typically, face height will not exceed 10 m or 70° slope angle and will generally follow HSE The Quarry Regulations 1999 guidance where appropriate.
6	Stockpiles, where present, will remain below 5 m in height and will rest at their natural angle of repose.	Fine aggregate dust will be managed to prevent transport via surface run-off into the swale.
7	Excavated faces will be cleared of uneven surfaces and slopes will be set at a safe slope, between 1:1 and 1:2 depending on the natural angle of repose of the exposed ground.	A gentler slope may be utilised where deemed necessary by the Principal Contractor's designer.
8	Vegetated material (Ref 3 above) will be placed in areas where excavation faces are exposed.	It is important that this is undertaken promptly after small temporary quarry operation ceases; it will speed up the re-vegetation process.

The quality and potential yield of material from each borrow pit will need to be investigated further post-consent. This will take the form of a Borrow Pit Assessment, undertaken following the completion of the GI.

13.3 Summary of Requirements

Table 9 summarises the requirements of the different parties involved in the construction of the Proposed Development with relation to Borrow Pits.

Table 9 Borrow Pits - Summary of Requirements

Party	Responsibilities & Requirements
Principal Contractor	Borrow Pit Assessment undertaken during initial site investigations. Ensuring that the CMS is adhered to. Carry out site inductions and toolbox talks.

14. Construction Traffic Management Plan

14.1 Introduction

The section sets out the Applicant's commitment to preparing a Construction Traffic Management Plan (CTMP) for the Proposed Development and should be read in conjunction with **Chapter 11: Traffic, Transport and Access** of the EIAR.

Relevant Conditions

The final CTMP will be prepared in line with the scope provided in the associated planning condition.

Site and Project Description

During the construction period a range of vehicles will be accessing the Development Site, including Heavy Goods Vehicles (HGVs) delivering plant (such as; excavators, bull dozers and cranes), vehicles delivering wind farm components, and smaller cars and vans associated with construction staff movement and equipment. It is proposed that construction vehicles will enter the Development Site via an upgraded access junction to the U1907 (NGR NH 60111 74809). **Appendix 11.1: Transport Assessment** (TA) of the EIAR provides further detail.

Aggregates for use in the Proposed Development's construction would be primarily sourced from onsite borrow pits (see **Section 13**), although a proportion may need to be imported from commercial quarry sites, with the nearest of these located at Alness to the south.

14.2 Final Construction Traffic Management Plan

A Transport Assessment is provided in **Appendix 11.1** of the EIAR, which includes a framework Construction Traffic Management Plan (CTMP). This final CTMP will be updated pre-construction and cross-reference to this will be provided in the final CEMP.

15. Forestry Waste Management Plan

A Forestry Waste Management Plan (FWMP) will be prepared. It will describes the felling and replanting plans associated with the Proposed Development and how forestry waste arising from the construction of the Proposed Development would be treated.

The conditions of the FWMP have not yet been agreed and when finalised.

16. Site Waste Management Plan

The Site Waste Management Plan (SWMP) sets out measures to be implemented with respect to waste management and ensuring the most appropriate means of recycling and/or disposal of waste is (or are) selected. The purpose of a SWMP is to demonstrate that measures will be put in place to sustainably manage waste generated during construction to aim to meet the Scottish Government targets for recycling construction and demolition waste. The plan will be used to record waste management performance during the construction period.

The conditions of the SWMP have not yet been agreed and when finalised.

17. Restoration and Reinstatement Plan

The Restoration and Reinstatement Plan sets out the proposals for post- construction reinstatement of those areas of the Development Site which are not required during the operational phase.

The conditions of the Restoration and Reinstatement Plan have not yet been agreed and when finalised.

18. Outdoor Access Management Plan

The Outdoor Access Management Plan, as referenced in **Chapter 11: Traffic, Transport and Access** of the EIAR will set out the proposals for maintaining public access to the Development Site during construction, operation and decommissioning, as per the Land Reform (Scotland) Act 2003.

The need for and conditions of the Outdoor Access Management Plan have not yet been agreed.

References

British Standards Institute (2014), BS 5228-1:2009+A1:2014 *Code of Practice for noise and vibration control on construction and open sites – Part 1 Noise* [Accessed 24.06.2025]

CIRIA (2001) *CIRIA Report C532: Control of Water Pollution from Construction Sites* [Accessed 25/06/2025]
CIRIA (2023) *CIRIA Report C811: Environmental Good Practice on Site (Fifth Edition)* [Accessed 25/06/2025]

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd ed).* The Bat Conservation Trust, London.

Control of Pollution Act 1974 [Online] Available at https://www.legislation.gov.uk/ukpga/1974/40/contents [Accessed 20/06/2025]

Environmental Protection Act 1990 [Online] Available at https://www.legislation.gov.uk/ukpga/1990/43/contents [Accessed 20/06/2025]

Forestry Commission (2023) *The UK Forestry Standard* [Accessed: 18/06/2025]

IEMA (2023) *Environmental Assessment of Traffic and Movement [*Accessed 25/06/2025]
ISO (2015) *ISO 14001:2015 Environmental management systems – Requirements with guidance for use* [Accessed 25/06/2025]

Land Reform (Scotland) Act 2003 [Online] Available at: https://www.legislation.gov.uk/asp/2003/2/contents [Accessed 24/06/2025]

NatureScot (2015) Constructed tracks in the Scottish Uplands [Accessed: 18/06/2025]

NatureScot (2017) [Formerly Scottish Natural Heritage] *Recommended Bird Survey Methods to Inform Impact Assessment of Onshore Windfarms.*

NatureScot (2020) *Advising on Carbon-Rich Soils, Deep Peat and Priority Peatland Habitat in Development Management* [Accessed 24/06/2025]

NatureScot (2021) *Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation* [Accessed 26/06/2025]

NatureScot (2024) Good Practice During Wind Farm Construction [Accessed: 18/06/2025]

NatureScot (2025) *Species Protection Plans*. [Online] Available at: https://www.nature.scot/professional-advice/protected-areas-and-species/licensing/species-protection-plan [Accessed 26/06/2025]

NetRegs (n. d.) *Waste Duty of Care* [Online] Available at https://www.netregs.org.uk/media/lwklri41/waste-duty-of-care.pdf [Accessed 20/06/2025]

Roads (Scotland) Act 1984 Section 96 [Online] Available at: https://www.legislation.gov.uk/ukpga/1984/54/section/96 [Accessed 24/06/2025]

Scottish Renewables (2015) *NatureScot, SEPA, FCS & Historic Environment Scotland, 2015. Good Practice during Wind Farm Construction.* Version 3, September 2015.

SEPA (2010) *Engineering in the Water Environment: Good Practice Guide: River Crossings* [Accessed 24/06/2025]

SEPA (2018) *Guidance for Pollution Prevention Works and Maintenance in or Near Water: GPP 5* [Accessed 24/06/2025]

SEPA (2021) *GPP 1 - Understanding your Environmental Responsibilities – Good Environmental Practices* [Accessed 25/06/2025]
SEPA (2021) *GPP 2 - Above ground oil storage tanks* [Accessed 25/06/2025]
SEPA (2022) *GPP 3 - Use and design of oil separators in surface water drainage systems* [Accessed 25/06/2025]
SEPA (2021) *GPP 4* - Treatment and disposal of wastewater where there is no connection to the public foul sewer [Accessed 25/06/2025]
SEPA (2018) *GPP 5 – Works and Maintenance in or Near Water* [Accessed 25/06/2025]
SEPA (2023) *GPP 6 – Working at Construction and Demolition Sites* [Accessed 25/06/2025]
SEPA (2021) *GPP 8 – Safe Storage and Disposal of Used Oils* [Accessed 25/06/2025]
SEPA (2021) *GPP 13 – Vehicle Washing and Cleaning* [Accessed 25/06/2025]
SEPA (2021) *GPP 19 – Vehicle: Servicing and Repairs* [Accessed 25/06/2025]

SEPA (2021) *GPP 20 - Dewatering underground ducts and chambers* [Accessed 25/06/2025]
SEPA (2021) *GPP 21 – Pollution Incident Response Planning* [Accessed 25/06/2025]
SEPA (2018) *GPP 22 – Dealing with Spills* [Accessed 25/06/2025]
SEPA (2021) *GPP 26 – Safe storage – drums and intermediate bulk containers* [Accessed 25/06/2025]
SEPA (2022) *GPP 27 – Installation, decommissioning and removal of underground storage tanks* [Accessed 25/06/2025]

SEPA (2021) *Supporting Guidance (WAT-SG-75) Sector Specific Guidance: Water Run-Off from Construction Sites* [Accessed: 18/06/2025]

SEPA (2024) *Accessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems* [Accessed 25/06/2025]

SEPA (2024) *The Water Environment (Controlled Activities) (Scotland) Regulations A Practical Guide v9.4* [Accessed: 18/06/2025]

SNH & FCS (2010). *Floating Roads on Peat. A Report into Good Practice in Design, Construction and Use of Floating Roads on Peat with particular reference to Wind Farm Developments in Scotland.* August 2010.

Susdrain (n. d.) *CIRIA Guidance* [Online] Available at: https://www.susdrain.org/resources/ciria-guidance.html#ciriaguidetop [Accessed: 18/06/2025]

The Conservation (Natural Habitats, &c.) Regulations 1994 [Online] Available at: https://www.legislation.gov.uk/uksi/1994/2716/contents [Accessed 24/06/2025]

The Control of Substances Hazardous to Health regulations 2002 [Online] Available at: https://www.legislation.gov.uk/uksi/2002/2677/regulation/7 [Accessed 24/06/2025]

The Highland Council (2014) *Guidance on the Preparation of Transport Assessments* [Online] Available at: https://www.highland.gov.uk/downloads/file/12194/guidelines_for_transport_assessments [Accessed 25/06/2025]
The Quarries Regulations 1999 [Online] Available at; https://www.legislation.gov.uk/uksi/1999/2024/regulation/7 [Accessed 20/06/2025]

The Scottish Office Development Department (1996) *Planning Advice Note 50 Controlling the Environmental Effects of Surface Mineral Workings (PAN 50)* [Online] Available at https://www.gov.scot/publications/planning-advice-note-pan-50-controlling-environmental-effects-surface-mineral/ [Accessed 20/06/2025]

The Waste Management Licensing (Scotland) Regulations 2011 [Online] Available at https://www.legislation.gov.uk/ssi/2011/228/contents [Accessed 20/06/2025]

The Water Environment (Controlled Activities) (Scotland) Amendment Regulations 2021 [Online] Available at [Accessed: 18/06/2025]

The Water Environment (Controlled Activities) (Scotland) Regulations 2011 [Online] Available at https://www.legislation.gov.uk/ssi/2011/209/contents [Accessed: 18/06/2025]

Transport Scotland (2012) *Transport Assessment Guidance* [Accessed 25/06/2025]