Appendix 11.1 Peat Slide Risk Assessment

Contents

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1 Introduction

- 1.1 This Peat Slide Risk Assessment (PSRA) report provides an overview of peat slide mechanisms, desk study information relating to the site, and survey results to highlight any risk of peat slide within the Proposed Development area.
- 1.2 The peat slide risk assessment was led by Jenny Hazzard, Environmental Planning Director at ITPEnergised. Jenny has a BSc in Geological Engineering and an MSc in Engineering Geology, and she is a Practitioner Member of IEMA. Jenny has 20 years of experience in environmental consultancy including EIA, geo-environmental assessment, ground investigations, and assessment of geology, hydrology and hydrogeology impacts. She has led on hydrology, hydrogeology and peat assessment work for several renewable energy and transmission & distribution projects across Scotland, including peat slide risk assessments and peat management plans for several proposed Scottish wind farm projects.
- 1.3 Field surveys were directed by Jenny and undertaken by members of the ITPEnergised Environmental Planning team and AECOM (project engineering consultants), with suitable experience of peat probing, geo-environmental and hydrological surveys.

2 Peat Failure Characteristics/Mechanisms

- 2.1 The Peat Landslide Hazard and Risk Assessments Best Practice Guide for Proposed Electricity Generation Developments, published by the then Scottish Executive (2006, updated by the Scottish Government April 2017) (hereafter referred to as the 'Best Practice Guide') determines peat landslide (instability) in two categories, 'peat slides' and 'bog bursts'. It is indicated that peat slides have a greater risk of occurrence in areas where peat depth is shallow (up to 2 m) and slope gradients are steep (5 to 15°). Bog bursts, however, are indicated to have a greater risk of occurrence in areas where peat depth is deep and slope gradients are shallow. As recorded in the Best Practice Guide, bog burst events have generally only been reported in Irish and Northern Irish peat bogs. They are uncommon in Scotland and therefore are not considered to attribute significant risk in relation to this assessment. It is noted that peat instability events (including bog bursts), although extremely uncommon, may occur outside the limits mentioned above.
- 2.2 Further to the simple definition above, a number of natural factors are considered to interact and create the potential for peat instability to occur. These natural factors would typically include:
	- **Slope Gradient:** as noted in the Best Practice Guide, peat slides have a greater likelihood of occurrence where slope angles range from 5 to 15° . Deposits with shallower slope gradients are less susceptible to failure due to the reduced influence of gravity. Deposits with steeper slope gradients are less susceptible to failure due to the general lack of peat presence (although peaty debris slide may occur).
	- Peat Depth: Boyland et al. (2008) describes three common types of peat, controlled to an extent by rainfall and elevation:
		- o Upland Blanket Bog: blanket bogs are typically about 3 m thick, however, they can be up to 5 m thick, generally thinning at higher elevations (note, the Proposed Development site is considered to generally fit the definition of an upland blanket bog site although recorded peat depths are generally shallower than the range noted).
		- o Lowland Blanket Bog: similar to the upland version, however, they form around sea levels in areas of very high rainfall.
		- \circ Raised Bog: generally 3-12 m thick, averaging 7 m, with growth occurring above the water table.
- 2.3 Peat depth can give an indication of peat strength and the potential magnitude of a slide, where the generalisation can be made that the potential for peat instability increases with peat depth provided gradients exist to allow movement. However, when combined with other instability indicators, any depth of peat can fail.
	- Peat Strength: the shear strength of peat is an important aspect in assessing the risk of landslip in blanket peat areas, with areas of lower shear strength likely to be the cause of any peat slide. However, due to the influence of fibres within the deposits and of stratification with depth, reliable values of shear strength are difficult to near-impossible to obtain, using common place in situ and laboratory soil strength tests. Where data is available, it can be used, with extreme caution, to assist in assessing likely risk.
	- Relief: the combination of slope gradient and variation in elevation can result in confined and unconfined zones i.e. where undulating or hummocky terrain (confined) exists, the natural relief has the potential to mitigate the occurrence of a peat slide. However, convex sloping hillsides (unconfined) can increase the hazard potential.
	- Evident and/or Potential Areas of Instability: the presence of certain geomorphological characteristics (refer to paragraph 2.7 below) may signify an increased risk of peat instability. However, peat instability events may occur in areas where no such geomorphological characteristics are present, if the general characteristics match those mentioned above.
	- **Vegetation Cover:** the vegetation cover of an area of bog/mire gives an indication as to its hydrological setting and therefore physical characteristics, as noted in the Best Practice Guide and detailed by Hobbs, 1986.
	- Peat Stratification: the peat formation process causes peat to show natural anisotropic strength. The interface between the three distinct layers (indicating three hydroseral stages) within a peat mass is defined by hydrology. The three layers are:
		- o Top Mat: living vegetation of herbaceous plants, grasses and mosses;
		- \circ Acrotelm: decomposing peat which is saturated periodically and is of relatively high permeability; and
		- o Catotelm: permanently saturated dense peat of relatively low permeability.

Peat stratification is linked to peat depth (Dykes, 2006), with thinner peat deposits having a thinner or no catotelm layer. A minimal or absent catotelm layer leads to peat mass having a higher shear strength, as the overlying top mat and acrotelm layers are more fibrous in nature compared to the underlying catotelm layer.

- **Hydrology (Surface and Subsurface):** surface (seeps and springs, wet flushes, watercourses, concentration of drainage networks etc.) and subsurface (pipe systems, underground channels etc.) drainage pathways can provide areas of peat with a water supply which may be absorbed by and potentially increase the mass of the peat. This can cause pooling/piping within the peat mass, or an increase in water at the base of the peat mass, each of which increases the susceptibility of the peat mass to failure.
- 2.4 The presence of a number of the above natural factors may create the potential for peat instability to occur, however, the actual instability is generally the result of a combination of further contributing factors. These factors have been grouped into two categories within the Best Practice Guide described as preparatory and triggering factors.
- 2.5 Preparatory factors, which affect the stability of peat slopes in the medium to long-term (tens to hundreds of years), are:
	- increase in mass of the peat through peat formation;
	- increase in mass of the peat through increase in water content;
	- increase in mass of the peat through afforestation:
- reduction in shear strength from changes in the physical structure of the peat due to creep, weathering or vertical tension cracks of the material;
- loss of surface vegetation and associated tensile strength (e.g. deforestation);
- changes in the subsurface hydrology (water filled pools and/or pipes etc.); and
- afforestation reducing the water held in the peat body, increasing the potential for formation of desiccation cracks which can be exploited by rainfall on forest harvesting.

2.6 Triggering factors, which can have an immediate effect on peat stability and act on susceptible slopes, include:

- intensive rainfall or snow melt causing development of high porewater pressures within the peat;
- alterations to drainage patterns generating high porewater pressures within the peat;
- peat extraction at the toe of the slope i.e. fluvial incision, cut slopes etc. reducing the support of the upslope material;
- peat loading commonly due to stockpiling or plant during construction (or natural causes i.e. landslide) causing an increase in shear stress;
- changes to the vegetation cover i.e. by stripping the surface cover or afforestation; and
- earthquakes or man-made rapid ground accelerations, such as blasting or mechanical vibrations, causing an increase in shear stress.
- 2.7 Evidence of the potential for peat instability within an area may be observed through the recording of the geomorphological conditions of the area. These existing geomorphological characteristics may indicate the presence of existing or historical failures or areas of future potential instability. The characteristics of particular interest include the presence of the following:
	- historical failure scars and debris;
	- tension cracking and tearing;
	- compression ridges/thrusts or extrusion;
	- peat creep;
	- subsurface drainage (pools and/or piping);
	- seeps and springs;
	- cracking related to drying;
	- concentration of surface drainage networks; and
	- the presence of organic clays at the peat and bedrock interface.

3 Sources of Data

- 3.1 A desk study was undertaken to examine documentary information relating to the site. This included the following data sources:
	- British Geological Survey, DiGMap and GeoIndex;
	- Scottish Natural Heritage (SNH) Carbon and Peatland Map, 2016;
	- Hydrogeological Map of Scotland, British Geological Survey, 1988;
	- Soil Survey of Scotland Maps, James Hutton Institute;
	- Scottish Natural Heritage Natural Spaces online database;
	- Habitat and botanical survey data (refer to Chapter 7 and Figures 7.3 and 7.4):
- Historical mapping from the mid-1800s to 1955, available from the National Library of Scotland; and
- Aerial photography (current and 2010).

4 Baseline Conditions

Geography, Topography and Geomorphology

- 4.1 The main development area of the site comprises mainly conifer plantation forestry. Current use by humans largely comprises forestry management works.
- 4.2 The topography of the site is characterised by a series of high hilltops from southwest to northeast (Priesthill Height, Nutberry Hill, Standingstone Hill and Tod Law, ranging from 370 m to 522 m Above Ordnance Datum (AOD) at their summits), separated by the valleys of Long Burn, Eaglin Burn and an unnamed minor watercourse, at levels around 300 m to 350 m AOD. To the southeast of this line of hills, the land slopes steeply down to the River Nethan valley, at approximately 275 m AOD at the southeast edge of the site. An additional southern spur, where two proposed turbines are sited, is south of the River Nethan, on land rising up from the river valley to Black Hill (summit elevation 360 m AOD).
- 4.3 The hills across the site feature largely rectilinear slopes, with some convexity restricted to the hilltops (shallow slopes in the immediate vicinity of the summits, steepening quickly. Other localised areas where slightly convex slopes are observed are on the central part of the eastern slope of Nutberry Hill, the southeast and east slopes of Tod Law, the northeast and east slopes of Standingstone Hill (near the top part of the hill only), and on the lower part of the northern slope of Black Hill. The northwest slope of Tod Law, the lower part of the northeast slope of Nutberry Hill, and the southwest slope of Standingstone Hill are slightly concave.
- 4.4 **Figure 1** shows the main geomorphological features of the site, including the position of major slope breaks, concave slopes, and major drainage features. Additionally, numerous smaller man-made drainage ditches are present onsite, being too numerous to show on the geomorphology map and are not clearly evident on aerial photography due to the forest cover. However, the presence and concentration of drainage features and wet ground is illustrated by bog, marshy, and occasional flush habitats mapped during habitat surveys, and these habitats are shown on **Figure 1**.
- 4.5 A selection of photographs below illustrates conditions at the Proposed Development site.

Photograph 1 – Disturbed soils at T6 location Photograph 2 – T11 location

Photograph 3 – Burn between T16 and T19 Photograph 4 – Along track towards T21

4.6 No clear evidence of any historical slope failure could be discerned from aerial photography (2010 or current editions). Several highly localised areas of fallen trees or areas where growth appears to have failed are evident within the forestry, however none of these areas exhibit the linear/crescent shape across slopes, or downslope run-out, that would be expected for a peat slide.

History

- 4.7 A review of historical map editions from the mid-1800s to 1955 identified the site as being open moorland with essentially no built development. A coal mine was located at High Monkshead south of the site, and small-scale lead mines were shown to be present on the banks of the River Nethan at the southern edge of the site (disused from the 1800s). Small-scale quarrying was evident in the north of the site on the edge of the Birkenhead Burn in the early 1950s.
- 4.8 No plantation forestry is shown on historical mapping up to and including 1955. It is not known when the site became forested.
- 4.9 Current aerial photography was consulted together with aerial photography at 5 m resolution, dated 2010, obtained from Emapsite, as part of the desk study review of site conditions. No material information was gained from this review that was not evident from mapping and site reconnaissance work. The 2010 aerial photography shows the site in largely the same condition as current, with the exception of some forestry blocks which have been felled in the intervening period. Close inspection was undertaken of both sets of aerial photography to identify signs of any failure, creep, changes in topography etc. however no such signs were identified.
- 4.10 Historical aerial mapping earlier than 2010 was not reviewed given that sufficient information on site conditions, peat depth and distribution etc. was considered to be available from other sources.
- 4.11 During the design iteration process for the Proposed Development, information has been made available from the Forest Manager, who reported having been involved with forestry management at Cumberhead Forest since 2002 and having no knowledge of any peat slides or landslides either during this period or prior to his involvement with this forest. He also reported having never observed any signs of land/peat slips within the forest during inspections through the mature conifer crop.
- 4.12 Searches have also been undertaken for any records of evidence of peat slides during construction of nearby wind energy developments located on similar terrain. No such records have been identified.

Vegetation

- 4.13 Site observations and ecological surveys have identified that most of the site area is occupied by coniferous plantation woodland. The main exceptions are briefly described below, with further detail in Chapter 7:
	- The western area between Nutberry Hill and the western site boundary is recently felled coniferous woodland, with localised bog, flush, heath and marshy grassland habitats at the far western edge alongside the site boundary.
	- Nutberry Hill itself and the area stretching southwest from the hill to the site boundary is characterised by blanket bog habitat, with localised areas of modified bog, grassland and heath around the boundaries of this blanket bog area.
	- **■** The area around the Eaglin Burn valley is characterised by bog, bracken, grassland and heath habitats.
	- Grassland and bracken are found along the Birkenhead Burn valley and area immediately to the south.
	- An area of blanket bog and modified bog is located in the far north of the site, north of proposed T19.
	- Localised areas of wet modified bog, blanket bog, marshy grassland, bracken, and occasional flush habitats are identified along watercourses across the site.

Rainfall

4.14 Rainfall data have been obtained from Eskdalemuir Observatory, approximately 70 km to the southeast of the Proposed Development. A rainfall precipitation rate of 1,634 mm per year is indicated, based on averages collated between 1971 and 2000.

Geological Conditions

- 4.15 BGS online mapping for the area shows that the bedrock geology underlying most of the site comprises sedimentary rock formations, principally sandstone, mudstone and wacke. Several igneous intrusions are evident, mainly in the southern part of the site.
- 4.16 BGS mapping shows that bedrock across most of the site area Is overlain by peat. Localised areas in the northeast, east and south are shown as having till overlying bedrock, with no peat. This is expected to comprise poorly sorted sand, gravel, cobbles and boulders in a clay matrix (observed in some exposures to be relatively coarse gravels, sands and cobbles). The routes of watercourses onsite have either little or no superficial material over bedrock, or alluvial deposits comprising clays, silts, sands and gravels.
- 4.17 The SNH carbon and peatland mapping (2016) defines most of the site as Class 5 peat, where no peatland habitat is recorded, but where soils are carbon-rich and deep peat. Swathes of land in the southeast, northwest and north are defined as Class 4, or areas unlikely to be associated with peatland habitats and unlikely to include carbon-rich soils. Localised areas in the southwest and east are Class 0, mineral soils. The area at Nutberry Hill in the southwest, extending southwest to the site boundary, is defined as Class 1 peat, defined as "nationally important carbon-rich soils, deep peat and priority peatland habitat; areas likely to be of high conservation value".
- 4.18 Peat depth surveys were undertaken as described in Section 5, to identify and characterise peat deposits that may be present around proposed turbines and associated infrastructure. The peat depth surveys identified areas of deep peat concentrated around the central, low-lying valley between Nutberry Hill and Standingstone Hill, the far north of the site, and the far southwest. The remaining areas surveyed were found to have peat depths generally less than 50 cm, therefore defined as peaty soil (refer to paragraph 5.13).
- 4.19 Peat across most of the site was observed to be disturbed and modified by the presence of tree roots and, in some areas uprooted due to wind blow. Conifer needles blanketed much of the site area within the forestry, obscuring ground conditions. However, in some locations, exposed banks of watercourses exhibit granular till materials (see below). Near the proposed T3 location, an exposure adjacent to a watercourse exhibits peat overlying weathered sedimentary rock.

Photograph 5 – Exposed peat over rock near T3

Surface Water

- 4.20 There are a number of watercourses within the site boundary and immediate surrounding area, with the two largest being the River Nethan in the south and the Logan Water in the north.
- 4.21 The River Nethan rises within the forest at the western edge of the site and flows from southwest to northeast. It forms the southern boundary of the main body of the site. The Eaglin Burn, Pockmuir Burn, and numerous additional tributaries flow into the River Nethan from the southern and eastern parts of the site.
- 4.22 The Logan Water rises on the eastern slope of Spirebush Hill to the west of the site, flowing north/northeast and following approximately the western site boundary to the Logan Reservoir, then turning east and south to join the River Nethan some 3 km northeast of the site boundary. The Birkenhead Burn, Long Burn and several additional tributaries flow into the River Nethan from the northern and western parts of the site.
- 4.23 All site drainage is eventually to the River Nethan via the above routes. Beyond the immediate site area, the River Nethan continues to flow generally east and north, under the M74 near Lesmahagow and into the River Clyde near Crossford.
- 4.24 The River Nethan water was classified by SEPA in 2018 as Moderate quality, and the Logan Water was classified by SEPA as Good in 2018.
- 4.25 Most of the watercourses on site feature narrow, well-defined channels within fairly wide, boggy or grassy banks between areas of forestry. At some watercourses towards the southwest, exposed banks exhibit granular, gravelly/cobbly till. Further descriptions of the watercourses and photographs are provided in Appendix 11.3, the schedule of proposed water crossings.

Hydrogeology

- 4.26 The groundwater body beneath the site is indicated by SEPA to comprise the North Glengavel groundwater. This groundwater body was classified by SEPA in 2018 as having an overall status of good.
- 4.27 The Hydrogeology Map of Scotland identifies the site as being underlain by a low productive aquifer in which flow is virtually all through fractures and other discontinuities.
- 4.28 Peat and peaty soils would also be expected to inhibit groundwater flow. Till, where present, is also anticipated to be relatively low, although variable permeability, inhibiting groundwater flow. The alluvial deposits on the banks of watercourses may exhibit higher permeability.
- 4.29 No Private Water Supplies (PWS) have been identified within a 1 km radius of the site boundary.

Human Receptors

4.30 Human receptors that may be at risk from peat slide include: construction staff during construction of the development, and the forestry workers accessing the site. Given the transient use of the site by these receptors, there is considered to be a low risk of direct harm from peat slide. However, the potential consequence of peat slide affecting onsite roads and therefore indirectly affecting forestry works and access, is considered further within the assessment.

Ecology

- 4.31 No terrestrial protected species have been identified as likely to be impacted by peat slide within the study area. Therefore, these have not been considered further in this assessment. The Muirkirk Uplands Site of Special Scientific Interest (SSSI) adjacent to the site boundary is nationally designated for its blanket bog and upland habitats and is therefore a highly sensitive receptor. It is therefore considered in the assessment of peat slide risk.
- 4.32 Ecological resources associated with watercourses are considered as part of the identified surface water receptors noted in the Surface Water section above.

Archaeology

4.33 A number of heritage assets have been identified within the site boundary, however none were assessed as being of any greater than low sensitivity. These are not considered highly sensitive to potential impact by localised peat slide, and are not considered further in the assessment.

Infrastructure and Built Environment

- 4.34 There are existing forestry tracks across the site, many which are proposed to be incorporated into the Proposed Development, which could potentially be impacted by peat slide and are considered in the assessment. The proposed turbines themselves also have the potential to be impacted by peat slide derived from other infrastructure locations which may be upslope. The turbines are considered as potential receptors, in the assessment of peat slide risk.
- 4.35 The nearest residential property is 780 m from the nearest turbine, with other individual properties from approximately 1 km or more outside the site boundary. Residential receptors which are downslope of the Proposed Development have been considered in the assessment of peat slide risk.

5 Peat Depth Survey

- 5.1 Based on a desk study review of published geological mapping, it was anticipated that peat could be present across much of the Proposed Development site, with some localised areas interpreted as likely having no peat deposits (mainly on hilltops/steep slopes and along watercourse banks).
- 5.2 A peat depth survey was therefore undertaken in three phases. Initially, a 'Phase 1' peat survey programme was undertaken, focusing on the vicinity of proposed turbine and new infrastructure locations, which had been devised as part of a design iteration process taking account of a range of physical and environmental constraints, including desk study findings relating to peat. It was considered appropriate to diverge from the relevant guidance on peat surveys (Guidance on Developments on Peatland - Site Surveys (2017), which recommends a 100 m grid of peat probe locations as an initial high-level survey strategy across an entire development site), due to the likelihood of substantial historical peat disturbance at the site, the considerable physical restrictions on accessing areas of dense forestry, the re-use of substantial existing forest road infrastructure, and the other established technical and environmental constraints guiding the layout iteration process.
- 5.3 This initial Phase 1 survey demonstrated that, in the main, proposed turbine and infrastructure locations were practical and made the most of existing forest roads. However, some localised deep peat was identified, prompting design changes to move infrastructure to areas of interpreted shallower peat. It was also concluded that there were gaps in the data obtained from the Phase 1 survey, requiring additional survey effort to further inform the design iteration process, prior to completing detailed Phase 2 survey work at confirmed 'design chill' infrastructure locations.
- 5.4 Therefore, a 'Phase 1b' survey programme was undertaken, seeking to gain peat depth data at and in the vicinity of proposed infrastructure locations where no data was available from Phase 1, as well as extending the coverage of survey points around proposed infrastructure locations, to aid in micro-siting or indeed more substantial re-siting of infrastructure where deeper peat was identified.
- 5.5 Following completion of Phase 1b surveys, the site design was further reviewed, and changes were made to avoid or minimise siting infrastructure on areas of deeper peat. A 'design chill' was arrived at, and Phase 2 surveys were subsequently undertaken, comprising detailed surveys at each proposed turbine and hardstanding location, along all proposed new access tracks, and at other proposed infrastructure locations including the site substation, met masts, construction compounds, laydown area, and borrow pit search areas.
- 5.6 The pattern of peat probing in relation to proposed turbine locations and other infrastructure elements can be broadly described as follows:
- **•** Probe at each proposed turbine location and plus a minimum of 50 m from the turbine location to the north, south, east and west. Additional points around proposed turbine locations were taken where initial results indicated peat (>0.5 m depth) may be present;
- Approximately five probes at each proposed turbine hardstanding area (centre and four outside corners);
- Every 50 m along proposed new access tracks, plus approximately 10 m either side of each probe, perpendicular to the route of the track;
- A minimum of five probes at the location of the proposed substation, temporary compound, temporary laydown area and within the proposed borrow pit search areas; and
- Several probes at or in the vicinity of the two proposed met mast locations.
- 5.7 Consultation was maintained with SEPA throughout the peat survey programme, to set out the proposed survey strategy, provide preliminary findings, and seek feedback. Although the above survey approach does diverge from the relevant guidance for the reasons set out above, it was agreed with SEPA that the surveys were appropriate and suitable for informing site design and assessment work.
- 5.8 Data obtained from the peat depth surveys were used to plot the presence and distribution of peat across the proposed infrastructure development areas at the site, create a contour plan, and feed into detailed design iteration.
- 5.9 In total, data has been obtained from 1,362 peat probe locations across the site area. **Figure 2** shows the peat survey locations, and Annex 1 provides the full set of peat survey data (probe locations and recorded depths).
- 5.10 Peat sampling was undertaken using a hand auger, at proposed turbine and infrastructure locations. Samples retrieved from hand augering were examined to provide additional information and understanding of the nature of peat at varying depths and locations. Selected peat samples, from locations where peat depth greater than 0.5 m was recorded, were dispatched to Envirolab laboratory and tested for moisture content, bulk density, and carbon content. Table 1 provides information on the location and depth of peat samples tested, and a selection of photographs is provided below Table 1 to show the nature of peat and peaty soils extracted by hand auger at these locations. The laboratory testing report is provided as **Annex 3**

Location	Easting	Northing	Depth (m below ground)	Notes
Turbine 1	273972	632452	0.99	Dark brown, wet, somewhat fibrous in upper part only, possible acrotelm/catotelm boundary.
				Fairly high carbon and moisture content.
Turbine 2	273971	633022	0.65	Pale brown, very low carbon and low moisture content, not peat.
Turbine 4	274485	632982	0.55	Medium brown, cohesive. Very low carbon and moisture content, not peat
Turbine 5	275207	633452	0.90	Pale brown, very low carbon and low moisture content, not peat.

Table 1 – Locations of Peat Samples Collected for Laboratory Analysis

5.11 As set out in Table 1, laboratory testing results from samples of peat taken during peat depth surveys identified moisture contents generally within or slightly below the typical values for peat of 85 to 95% for half of the 12 samples, while moisture contents were well below this range in the other half. Carbon contents were recorded as being substantially below the typical value of 55% for peat in the same six samples which exhibited low moisture contents (taken from the proposed locations of T2, T4, T5, T13, T15 and T16). This suggests that materials in at least some areas of the site may be considered peaty or organo-mineral soils, rather than peat.

Photograph 6– Auger from T2 Photograph 7 – Auger from T5

Photograph 8 – Auger from T7 Photograph 9 – Auger from T9

Photograph 10 – Auger from T13 Photograph 11 – Auger from T19

Survey Results

5.12 The general distribution of depth of penetration recorded during the peat survey is summarised in Table 2 and presented in **Figure 3**.

Table 2 – Distribution of Peat Depth Recorded at the Site

5.13 The Peat Landslide Hazard Best Practice Guidance (2017) uses the following Joint Nature Conservation Committee (JNCC) report 445 'Towards an Assessment of the State of the UK Peatlands' definition for classification of peat deposits:

- Peaty (or organo-mineral) soil: a soil with a surface organic layer less than 0.5 m deep;
- Peat: a soil with a surface organic layer greater than 0.5 m deep which has an organic matter content of more than 60 %;
- Deep Peat: a peat soil with a surface organic layer greater than 1.0 m deep.
- 5.14 Applying these definitions indicates that the deposits underlying around 32% of the surveyed site area comprise peaty or organo-mineral soil. The above definition of peat applies to conditions recorded at around 41% of probes, with the remaining 27% of probes encountering deep peat.

Peat Contour Mapping

- 5.15 **Figure 3** (a to d) shows the interpreted peat depth, both as individual data points and as a contour plan based on interpolation of those peat sampling data points. The contouring has been undertaken using Natural Neighbour interpolation function within the Spatial Analyst Tools of ArcMap 10, which finds the closest subset of input samples to a query point and applies weights to them based on proportionate areas in order to interpolate a value.
- 5.16 Apart from peat depth at each survey point, no other inputs were defined by the user. Information from ESRI (the software provider) defines the Natural Neighbour function as such: "Interpolates a raster surface from points using a natural neighbour technique". As shown on **Figure 3**, interpolation has not been undertaken between probed areas, where no data is available. No assumptions have been made as to peat depth distribution outside the surveyed areas.
- 5.17 The peat contour mapping shows areas of peat with depth over 1 m, largely in the low-lying central area between Nutberry Hill and Standingstone Hill, the low-lying area west of Tod Law, and the far north of the site, north of the Birkenhead Burn.
- 5.18 The far southwest area of the site also exhibited peat depths greater than 1 m, however shallower than the above-noted areas, with no probes in the southwest recording peat deeper than 2 m.

6 Peat Stability Hazard Scoring

Introduction

6.1 The Best Practice Guide defines the hazard scoring assessment as 'the likelihood of a peat landslide event occurring'. It states that there are a number of possible methods for hazard scoring and that an initial qualitative hazard scoring matrix methodology be employed using professional judgement based on qualitative scoring scales.

Methodology

- 6.2 The allocation of hazard score values for the various parameters which influence peat landslide occurrence (e.g. slope gradient, peat depth) is not defined in the Best Practice Guide and there is no published guide specifically relating to this issue. As such, it is left to the assessment teams to develop their own approach for categorising the hazard scoring for the site and the following sections outline the approach used for this specific site.
- 6.3 Firstly, it is important to note that the Proposed Development layout, including siting of turbines and other infrastructure, resulted from an iterative process which took into account the findings from peat survey work. Deeper peat was avoided wherever possible, in order to minimise the requirement to disturb and/or excavate peat, and to minimise peat slide risk associated with construction across and within peat.
- 6.4 Given that there is no evidence of current or historical peat instability at the site, and that the site design largely avoids areas of deep peat and steep slopes, it is considered appropriate to focus the assessment of peat slide risk on the proposed infrastructure locations, rather than the wider site where no disturbance or construction activity is proposed.
- 6.5 The potential for a peat slide to occur is controlled by a number of natural controlling factors. These are typically:
	- Slope gradient;
	- Peat depth;
- Peat strength;
- Relief:
- Evidence of historical failures/potential instability (e.g. tension cracks, creep, compression ridges);
- Vegetation cover; and
- Hydrology.
- 6.6 The Best Practice Guide relates peat landslide hazard, or likelihood, to a scale of 1 to 5, with 1 being negligible likelihood and 5 being almost certain. This scale relates to the final hazard potential for all the controlling factors under consideration. No guidance is provided on how the various factors should be combined to derive a final hazard scoring and the assessment team has derived a numerical scoring system as detailed in the following sections.
- 6.7 The most important of the above controlling factors are considered by the assessor to be peat depth and slope gradient as without both of these elements a risk of peat slide would be unlikely to exist. However, there are additional factors which can contribute to the potential for instability to occur, as set out above, and these have been considered in the evaluation of likelihood of peat slide (i.e. hazard scoring). This approach to the hazard, or likelihood, evaluation is described below and has resulted from a review of several case studies and assessments by experts in PSHRA for Scottish wind energy developments, and associated literature sources on peat slide mechanisms and reported contributing factors, as referenced in the sections below.
- 6.8 In total, eight factors have been considered in the hazard scoring process. These are noted below, with details of the scoring attributed for each factor set out in the subsequent paragraphs.
	- Slope angle
	- Peat depth
	- Nature of substrate
	- Geomorphology
	- Drainage/hydrology
	- **■** Forestry
	- Relief/convexity
	- Land use
- 6.9 Peat strength has not been included as a factor in the hazard scoring process. Site specific peat strength data was not collated for the site given the difficulty in obtaining reliable values of shear strength using common place in situ and laboratory soil strength tests. The shear strength is also linked to peat depth as strength is considered to decrease with thickness. As such this parameter is considered to be factored into the hazard scoring for peat depth.
- 6.10 It is important to note that this study only focuses on peat soils and the criteria used are specifically tailored to the key factors affecting peat stability. As such it does not account for the stability of other mineral soils or rock.

Input Data Sets

- 6.11 The input data sets used for the analysis were as follows:
	- Slope angle: Terrain 5 DTM with a 5 m grid size:
	- Peat depth: Site survey information for peat depth and site observations;
	- Substrate: Surveyor observations of substrate "feel" at the refusal point during probing, together with BGS geological mapping and surveyor observations of exposed substrate at the site;
	- Geomorphology: Surveyor observations and aerial photography;
- Drainage: Surveyor observations, mapping and aerial photography;
- Forestry: Surveyor observations, mapping and aerial photography;
- Relief (convexity): Topographical mapping; and
- Land use: Surveyor observations, mapping and aerial photography.
- 6.12 The assessment focuses on the proposed infrastructure locations (turbines including hardstandings, tracks, substation compound, temporary construction compounds, laydown area, borrow pit search areas, and met masts).

Hazard Scoring and Ranking

- 6.13 There is no guidance available on how to combine the hazard scoring for each of the factors used in the assessment. The assessment team have used the methodology set out below, based on a review of case studies and assessments undertaken by a range of experts (in particular, a hazard scoring methodology adopted by east point geo on a number of assessments, including recently for the proposed Energy Isles Wind Farm in Shetland (east point geo, 2019)), informed by various literature sources as referenced below.
- 6.14 For each of the eight factors noted above, a score of zero to three has been assigned. A zero score reflects no contribution to peat slide likelihood, with a score of three indicating a high peat slide likelihood associated with that particular factor.
- 6.15 The total hazard score is the sum of the eight individual factor scores, with the maximum total hazard score therefore being 24.

Slope Angle

- 6.16 The limiting factor governing the formation of thick peat deposits is topography. In the case of blanket peat, it tends to be deepest in closed depressions, and typically thin as the slope angle increases (Boylan et al. 2008). The Best Practice Guide details that peat slide hazard risk assessment is not needed for blanket bog sites with slopes less than 2° and as such, a score of zero has been assigned for slopes less than 2°. For slopes greater than 2, scores have been assigned based on the type and nature of peat slides reported for different slope conditions.
- 6.17 A slope angle GIS layer was generated from the DTM at a 5 m cell resolution. The source DTM is also at a 5 m resolution. The slope angle details are illustrated in **Figure 4**.
- 6.18 This slope, calculated in degrees, was identified at each proposed infrastructure element and scored as shown in Table 3.

Table 3 – Peat Stability Hazard Scoring (Slope)

Peat Depth

- 6.19 Peat thickness is seen as one of the key factors associated with peat stability. Typically, the deeper the peat the more humified, and therefore potentially weaker and unstable it is. Peat depth surveys have been completed on the site and these data were then interpolated using the Natural Neighbour interpolation function within the Spatial Analyst Tools of ArcMap 10.3 (see **Figure 3**).
- 6.20 The highest hazard scores have been assigned to peat depth ranges most frequently associated with peat slides on upland sites (Evans and Warburton, 2007).
- 6.21 The peat depth was identified at each proposed infrastructure element and scored as shown in Table 4.

Peat Depth (m)	Depth Score	Notes
Nil	0	No peat/organic soil therefore no potential for peat slide
$<=0.5$	1	Peaty/organic soil rather than peat, therefore failures would be peaty-debris slides
$0.51 - 1.5$	3	Sufficient peat thickness for peaty debris or peat slide
>1.5 2		Sufficient peat thickness for peat slide however less often recorded at this thickness, due to thicker peat generally occurring in areas of shallow gradients

Table 4 – Peat Stability Hazard Scoring (Peat Depth)

Substrate

- 6.22 The nature of the substrate beneath peat deposits can have a bearing on the likelihood of instability arising, with failure often occurring at the interface between the base of the peat mass and the top of the substrate. A smooth, relatively impermeable substrate surface can result in a 'slippery' interface, accumulation of groundwater and/or low shear strength at the interface, resulting in a higher susceptibility for the overlying peat mass to fail. Conversely, granular substrate such as sand and gravel or permeable bedrock, can provide greater frictional strength, reducing the potential for failure to occur at the peat/substrate interface.
- 6.23 The nature of the substrate was inferred at each proposed infrastructure element, based on surveyor observations and BGS geological mapping, and scored as shown in Table 5. It should be noted that observations of exposed bedrock and substrate (poorly sorted, generally granular till and weathered sedimentary bedrock) could be made at various locations across the site, increasing confidence in identification of the substrate across the site as bedrock (assigned a score of 1 for conservatism and given the likely low permeability) or granular till.

Table 5 – Peat Stability Hazard Scoring (Substrate)

Geomorphology

- 6.24 Geomorphological considerations such as peat erosion, hagging, peat pipes, pools, and evidence of existing instability, can contribute to the potential for instability to arise.
- 6.25 The geomorphological conditions were noted at each proposed infrastructure element, based on surveyor observations, mapping and aerial photography, and scored as shown in Table 6.

Table 6 – Peat Stability Hazard Scoring (Geomorphology)

Drainage

6.26 The presence and geometry of natural and artificial drainage features can affect the stability of a peat mass, by creating lines of weakness. Where drainage features follow the slope direction, this effect is not likely to be as pronounced as drainage features being either oblique to or perpendicular to the slope direction.

6.27 The drainage conditions were noted at and in the vicinity (within ~100 m) of each proposed infrastructure element, based on surveyor observations, mapping and aerial photography (supplemented by habitat survey findings given the difficulty in identifying drainage details in dense forestry from aerial photography), and scored as shown in Table 7.

Table 7 – Peat Stability Hazard Scoring (Drainage)

Forestry

- 6.28 The presence of forestry can increase the mass loading and affect the potential for instability. The alignment of forestry rows, and the presence or otherwise of desiccation cracking are factors which can influence stability (Bragg & Lindsay, 2005).
- 6.29 Hazard scores relating to forestry are set out in Table 8.

Table 8 – Peat Stability Hazard Scoring (Forestry)

Forestry Description	Forestry Score	Notes
Not afforested	0	No impact on likelihood of peat slide
Deforested, ridge and furrows aligned to slope	$\overline{}$	Likely high water table, lines of weakness may be present but aligned to slope direction
Deforested, ridge and furrows oblique to slope	$\overline{3}$	Likely high water table, lines of weakness may be present (cracks), oblique to or across slope and therefore more likely to result in instability
Mature forest, ridge and furrows aligned to slope	$\mathbf{1}$	Forestry affects loading/mass but rows aligned to slope direction are less likely to result in instability than rows oblique to or across slope
Mature forest, ridge and furrows oblique to slope	$\overline{2}$	Forestry affects loading/mass and rows oblique to or across slope direction are more likely to result in instability

Relief (Convexity)

- 6.30 Several references have been made to peat instability initiating at convex and concave slopes. In particular, convex slopes may have thicker peat upslope, with the potential to buckle and fail, with thinner peat further down the slope providing limited support (Dykes & Warburton, 2007; Boylan & Long, 2011).
- 6.31 The relief, specifically the identification of slopes being planar, convex or concave, was noted at each proposed infrastructure element, based on topographical mapping, and scored as shown in Table 9.

Table 9 – Peat Stability Hazard Scoring (Relief)

Land Use

- 6.32 Land uses such as moor burning, quarrying, and peat cutting, can impact on the stability of the peat mass.
- 6.33 The nature of the land use was noted at each proposed infrastructure element, based on surveyor observations, mapping and aerial photography, and scored as shown in Table 10.

Table 10 – Peat Stability Hazard Scoring (Land Use)

Land Use Feature	Land Use Score	Notes
Evidence of burning	1	Burning activities may theoretically create desiccation cracking and allow water to flow to the base of the peat, creating a failure surface (limited evidence in practice)
Quarrying adjacent to location	$\overline{2}$	Failures have been reported adjacent to quarrying activity, although typically bog bursts or flows rather than peat slides in blanket bog areas
Peat cutting	3	Peat failures have often been reported associated with peat cutting
Any land use other than noted above	0	No impact on likelihood of peat slide

Peat Slide Hazard Scoring Summary

6.34 As noted in paragraph 6.15, the scores assigned for each of the above eight factors were summed to give a total hazard score associated with each proposed infrastructure element.

- 6.35 Hazard (likelihood) category rankings have then been assigned based on the total hazard scores. The hazard rankings reflect the qualitative likelihood of failure, from very low to very high, taking into account the combination of all factors described above. The maximum hazard score, if all element scores are three, is 24. Where the hazard score is less than 12, i.e. less than half the maximum, the likelihood of failure is considered to be very low or low.
- 6.36 Table 11 sets out the hazard category ranking system employed in this assessment.

Table 11 – Hazard Ranking

- 6.37 Detailed hazard scoring, showing the scores given to each infrastructure element for each of the above factors, is set out in **Annex 2**. Table 12 below presents a summary of the Hazard Ranking for each proposed infrastructure element at the site, using the methodology described above.
- 6.38 The access track sections noted below are labelled on **Figures 3 and 4**.

Table 12 – Hazard Scoring Summary

- 6.39 As can be seen from Table 12, the slight majority of the infrastructure elements have been assigned hazard rankings of low (26 of the 50 elements assessed), with one additional element assigned a ranking of very low. The remaining 23 elements have been assigned a hazard ranking of moderate. The moderate hazard rankings reflect that various locations across the site feature moderate slopes with peat depths recorded over 0.5 m, with some other factors such as drainage and (in most areas) forestry contributing to the potential for instability to arise.
- 6.40 For a site with no evidence of historical failures, and no records of failures during construction or operation of nearby windfarms on similar terrain, the results of the above hazard scoring process suggest that the analysis may be somewhat conservative. However, the potential for instability to arise, particularly in the event of loading/disturbance, has been identified and requires further consideration with respect to the potential consequences of failure, and therefore overall risk.

7 Peat Slide Hazard Risk Assessment

Methodology

7.1 The level of risk allocated to a particular area relates to the presence of peat, the likelihood of failure occurring (the hazard) and the consequences of such a failure (the exposure). Risk assessment should be based on consideration of the hazard (discussed above) and exposure (consequence of peat failure):

Hazard x Exposure = Risk

Consequences of Peat Failure (Exposure)

- 7.2 The effects of peat failures are felt locally, both in the long and short term, but they can also have wider off-site implications.
- 7.3 A key part of the risk assessment process is to identify the potential scale of peat failure, should it occur, and identify the potential environmental effects as well as the receptors of such an event.
- 7.4 Predicting the size of a failure and the distance it may travel is very difficult. The high moisture content of peat makes it especially mobile once it fails and the structure of the peat breaks down. If a peat slide enters a watercourse this can mobilise the slide further and have impacts many kilometres beyond the bounds of the site. In many instances, minor slumps are localised and have

little or no impact. Other failures may travel 100 – 200 m and those entering watercourses, many miles, as was the case of the Derrybrien failure in Co. Galway, Ireland in 2003 (Bragg & Lindsay 2005).

7.5 Peat failure associated with the Proposed Development could affect the following key receptors:

- The Proposed Development itself including associated infrastructure;
- Site workers and plant (risk of injury/death or damage to plant);
- Public roads and other infrastructure:
- Dwellings, business properties and communities;
- Land based ecological effects (damage to habitats);
- Effects on the quality of onsite and downstream watercourses;
- Site drainage (blocked drains/ditches leading to localised flooding and/or erosion);
- Archaeological assets; and
- Visual amenity (scarring of the landscape).
- 7.6 The surface watercourses on and adjacent to the site and other potentially sensitive receptors are described in paragraphs 4.17 to 4.32 above. The sensitive features considered in the assessment are: surface watercourses; the Muirkirk Uplands SSSI adjacent to the site; the Proposed Development infrastructure (principally turbines); residential properties downslope from the Proposed Development; and existing forestry roads on the site.
- 7.7 The following approach to analysis of the consequence, or exposure, has been based on a review of PSHRA reports undertaken by a range of professionals for different sites across Scotland, together with reference to the guidance and literature noted above, and professional experience. The analysis considers the sensitivity of the receptor, the distance between the potential source of instability and the receptor, and the relative elevation of the source compared to the receptor. This is considered to be a more realistic and suitable analysis than considering distance alone, given that a receptor which is close to a source area but is up-gradient from it, would not be affected by runout from the resultant failure.
- 7.8 In this assessment, the proposed infrastructure elements are considered to be the potential sources areas of instability. The exposure assessment involves identification of sensitive receptors in the down-gradient direction from each proposed infrastructure element (source area), and assigning scores for sensitivity of receptor, proximity, and relative elevation. The rationale for assigning each of these scores is set out in Tables 13 to 15 below.

Table 13 – Exposure Scoring (Receptor Sensitivity)

Table 14 – Exposure Scoring (Proximity)

Table 15: Exposure Scoring (Relative Elevation)

- 7.9 A total exposure score has been determined for each proposed infrastructure location, by multiplying the three component scores together and taking the cube root of the result. This is considered to provide an appropriate reflection of the overall consequence, or exposure, taking account of receptor sensitivity, proximity, and relative elevation as contributing considerations.
- 7.10 Where more than one receptor was identified down-gradient from a given proposed source area, the process has been repeated for each receptor, and the highest total exposure score has been used in the assessment related to that particular source (proposed infrastructure element).
- 7.11 Table 16 gives a qualitative description of the exposure (impact) associated with the scores determined by the above method.

Table 16 – Peat Slide Exposure Categories

7.12 Table 17 below provides a summary of the exposure assessment at each of the proposed infrastructure elements.

Table 17 – Peat Slide Exposure Scores

7.13 As shown in the summary table above, the total exposure scores range from 1.59 to 2.88, reflecting the presence of sensitive receptors, tempered by the distance between receptors and source areas and/or the relatively gentle topography in some areas where infrastructure elements have been sited.

Peat Slide Hazard Risk Scoring

7.14 Following the identification of the above hazards and exposure, it is possible to categorise each proposed infrastructure element (i.e. each potential source location) with a risk score, by multiplying the likelihood of failure (Hazard Ranking) by its potential impact (exposure score). The matrix suggested by the Best Practice Guidance to determine the risk category is presented in Table 18 below.

Table 18 – Peat Slide Risk Categories

7.15 Table 19 below presents a summary of the assessment of peat slide risk based on the methodology set out above.

Table 19 – Peat Slide Risk

CUMBERHEAD WEST WIND FARM 30 30

- 7.16 The summary presented in Table 19 indicatesthat the risk of peat slide at all proposed infrastructure elements except two is low. The risk at T13 is assessed as having negligible risk, however the southern borrow pit search area is assessed as having a medium risk.
- 7.17 The assessment has therefore identified that the development, as currently proposed, is suitable for development pending further investigation to refine the assessment and mitigate hazards (see Section 8 for details). The exception is the southern borrow pit search area, however as noted in Chapter 11, this represents an area of search, within which only a proportion would actually be excavated to win stone for the site's construction. No excavation will occur until further site investigations have been undertaken to assess the suitability of the area and refine the assessment of peat slide risk. For example, areas of deeper peat within the search area would be avoided,

thereby reducing the peat slide risk. If it is determined that no suitable excavation site within the search area can be identified, then no excavation will occur at that search area.

8 Proposed Development Design and Mitigation

Detailed Design and Site Investigation

- 8.1 A detailed site investigation would be required to assist detailed design. Intrusive ground investigations would be completed at infrastructure locations prior to construction commencing to ascertain depth to bedrock and suitable founding conditions.
- 8.2 A detailed stability analysis can then be completed at all infrastructure locations using the increased confidence in the shear strength/peat depth data and site-specific topographical survey data, to provide added robustness to the stability assessment.

Turbines and Hardstandings

- 8.3 This peat slide hazard risk assessment has identified that all turbines are at low risk locations. However, a specific construction method statement would be produced which would draw on the findings of intrusive investigations. The method statement would detail the exact construction methodology to be used, in line with the Peat Management Plan and taking into account:
	- Opportunities for micro-siting turbines to further minimise risk where possible;
	- A geotechnical analysis for each turbine base;
	- **•** The method of excavation and the location for placing and storing excavated material to ensure that these operations do not give rise to slope or site instability;
	- Methodology for storing and watering surface vegetated turves, for re-sodding bare areas;
	- Details of how excavated spoil would be stored;
	- Avoidance of construction (if possible) on wet areas, flushes and easily eroded soils;
	- Adequate drainage design to cater for expected heavy rainfall events; and
	- Monitoring of ground movement and water levels.
- 8.4 The Construction Method Statement would also detail how pumped water from excavated bases would be controlled and monitored to ensure it is appropriately managed and if directed into or conveyed to existing drains/watercourses, to ensure that all have adequate treatment beforehand and capacity to deal with the volumes of water encountered.

Access Tracks

- 8.5 Areas of deep peat have been avoided wherever possible with respect to access track routing, as described in Chapter 2 of the EIA Report. However, it has not been possible to entirely avoid all areas of deep peat, therefore mitigation measures are set out below.
- 8.6 In two locations, localised stretches of track are likely to traverse deep peat. These stretches are from or between existing tracks and the routing seeks to ensure best use is made of existing infrastructure, with short lengths of track over deep peat considered preferable to entirely new tracks elsewhere, over shallower peat. If, following detailed pre-construction site investigations and micro-siting, these localised stretches cannot avoid being routed over deep peat, then they will be floated, to avoid the requirement to excavate deep peat. Based on the findings of the peat surveys, it is estimated that approximately 410 m of the new roads would be floated.
- 8.7 Construction of floated roads would be carried out considering the effects of consolidation and the effect loading would have on stability, hydrology and ecology. Construction would require the placing of a geotextile membrane on existing topsoil and vegetation followed by aggregate layers. Depending on ground conditions identified from further, detailed geotechnical investigations, two or more layers of geotextile would be placed in layers of 300 mm to 500 mm. The access tracks would be capped with layers of Type 1 or similar material. Type 1 is unbound aggregate mixture

specified under Clause 803 of the Specification for Highway Works (2016) as suitable for vital load bearing foundation in road construction.

- 8.8 The following additional mitigation measures would be employed to ensure suitable construction of tracks and minimising risk of instability:
	- Road alignments would be micro-sited to further reduce risk where possible and appropriate, based on detailed site investigation findings;
	- Roads would be constructed to take the required vehicular loadings, having due regard to overall site stability;
	- Machinery and vehicles used in track construction would be operated from the already constructed sections of the road as it progresses;
	- Conservative design parameters would be used, taking account of potential impacts of localised deforesting and re-planting;
	- Good quality rock would be used to construct roads where applicable:
	- Ground movement and water level monitoring would be carried out at all times;
	- All machinery and construction methods onsite would be selected with a view to minimising impact on the surrounding habitat; and
	- All roads would have sufficiently sized culverts, permeable fill or cross drains at the location of each water crossing, flush or other hydrological feature in order to allow the natural flow of water across the site and prevent ponding and the generation of pore pressures which may initiate instability.

Peat Storage

- 8.9 The principles of temporary peat storage are discussed in Appendix 7.2 Outline Peat Management Plan. Detailed requirements for any appropriate mitigation measures would be set out in the Construction Environmental Management Plan (CEMP).
- 8.10 Best practice measures for temporary and permanent peat storage during construction would be followed, in accordance with guidance including Developments on Peatland: Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and the Minimisation of Waste (Scottish Renewables and SEPA, 2012). This includes:
	- selecting suitable temporary storage areas with relatively low ecological value, and low stability risk i.e. not at the crest of a slope or in areas identified as being at higher risk of instability;
	- reuse of temporarily stored peat as soon as possible after excavation;
	- dressing and reinstating peat used for road verges and infrastructure batters (as part of site landscaping works) as soon as practicable after construction; and
	- suitably limiting the angle of reinstated slopes to reduce run-off and erosion.

Drainage Areas

- 8.11 Design and construction of a suitable drainage system for the Proposed Development would follow Sustainable Urban Drainage Systems (SUDS) principles and would ensure natural drainage without significant alteration of the hydrological regime of the local site area.
- 8.12 Any construction activity relating to, or undertaken in the vicinity of watercourses would be carried out in general accordance with relevant SEPA Pollution Prevention Guidelines, The Water Framework Directive (WFD), The Water Environment and Water Services (Scotland) Act 2003 (WEWS) and the Controlled Activities Regulations (CAR) 2011 (as amended).

Borrow Pits

8.13 Pre-construction site investigation works would be undertaken to further assess the borrow pit search areas and to identify the specific excavation locations and extents within the search areas.
This would be based on peat depth and distribution, with deep peat avoided, and suitability of rock for excavation. These further investigations would also establish the method of extraction, determining whether any blasting is required. If blasting is required, further analysis of potential impacts on peat stability in the vicinity would be undertaken and appropriate mitigation stipulated.

Monitoring and Management

- 8.14 A line of surveyed and levelled pegs and visual monitoring is an acceptable method of monitoring movement adjacent to roads, excavations and stockpile areas.
- 8.15 Thus, as construction activities commence, the appearance of the area and surrounding land would be monitored visually by installing a line of levelled pegs adjacent to the activity location. Specifically, the following signs would be looked for:
	- An increased rate of sinking or tilting;
	- The rising of adjacent peat/peaty soils;
	- Cracking and lateral movement of the soil surface; and
	- A rise in water levels.
- 8.16 The Principal Contractor would ensure that suitably qualified and experienced construction staff are engaged on the project, including a senior geotechnical engineer with extensive practical knowledge and experience of similar conditions to those at the site. The senior geotechnical engineer would have responsibility for maintaining and actively monitoring a geotechnical risk register for the construction works.
- 8.17 On a similar note, all staff would undergo a site induction and suitable training relating to construction on peatland sites. This would raise awareness of ground instability indicators, best practice construction techniques, mitigation and emergency procedures. All staff should be responsible for observational monitoring and reporting.

9 Conclusion

- 9.1 Based on an extensive peat survey programme, the Proposed Development is characterised as a blanket bog site with variable peat depths across the site. The Proposed Development layout, including turbines and associated infrastructure, has been designed to avoid the areas of deep peat wherever possible and areas where peat landslide may occur. Further detailed design would be informed by detailed ground investigations to be undertaken prior to commencement of any works onsite.
- 9.2 The peat slide risk assessment has identified that all proposed infrastructure elements represent a low peat slide risk, except one section of access track assessed as having a negligible risk, and one borrow pit search area assessed as having a medium risk.
- 9.3 Mitigation measures are detailed herein which would assist in reduction of any potential risks associated with construction activities causing ground instability, including undertaking detailed intrusive ground investigations to clarify risks and allow stipulation of specific geotechnical mitigation measures and/or micro-siting as required. If, following further investigations and refinement of the risk assessment at the southern borrow pit search area, it is determined that no suitable excavation site can be identified, then no excavation will occur at that search area.

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ANNEX 1 – Peat Depths

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ANNEX 2 – Hazard Scoring

ANNEX 3 – Laboratory Results

FINAL ANALYTICAL TEST REPORT

Envirolab Job Number: 20/07568 **Issue Number:** 1 **Date:** 23 September, 2020

Client: Energised Environments Ltd 7 Dundas Street **Edinburgh** EH3 6QG

Project Manager: Sarah Tullie
 Project Name: Cumberhead Project Ref: 2694
 Order No: EE13 **Date Samples Received: Date Instructions Received:** 09/09/20 **Date Analysis Completed:** 23/09/20

Project Name: Cumberhead West Wind Farm EE131692
07/09/20

Sophie France Richard Wong Client Service Manager Client Manager

Prepared by: Approved by:

Envirolab Job Number: 20/07568 Client Project Name: Cumberhead West Wind Farm

Envirolab Job Number: 20/07568 Client Project Name: Cumberhead West Wind Farm

Client Project Ref: 2694

REPORT NOTES

General

This report shall not be reproduced, except in full, without written approval from Envirolab.

The results reported herein relate only to the material supplied to the laboratory.

 The residue of any samples contained within this report, and any received with the same delivery, will be disposed of six weeks after initial scheduling. For samples tested for Asbestos we will retain a portion of the dried sample for a minimum of six months after the initial Asbestos testing is completed.

Analytical results reflect the quality of the sample at the time of analysis only.

Opinions and interpretations expressed are outside the scope of our accreditation.

If results are in italic font they are associated with an AQC failure, these are not accredited and are unreliable.

A deviating samples report is appended and will indicate if samples or tests have been found to be deviating. Any test results affected may not be an accurate record of the concentration at the time of sampling and, as a result, may be invalid.

The Client Sample No, Client Sample ID, Depth to Top, Depth to Bottom and Date Sampled were all provided by the client.

Soil chemical analysis:

All results are reported as dry weight (<40°C).

For samples with Matrix Codes 1 - 6 natural stones, brick and concrete fragments >10mm and any extraneous material (visible glass, metal or twigs) are removed and excluded from the sample prior to analysis and reported results corrected to a whole sample basis. This is reported as '% stones >10mm'.

For samples with Matrix Code 7 the whole sample is dried and crushed prior to analysis and this supersedes any "A" subscripts All analysis is performed on the sample as received for soil samples which are positive for asbestos or the client has informed asbestos may be present and/or if they are from outside the European Union and this supersedes any "D" subscripts.

TPH analysis of water by method A-T-007:

Free and visible oils are excluded from the sample used for analysis so that the reported result represents the dissolved phase only.

Electrical Conductivity of water by Method A-T-037:

Results greater than 12900µS/cm @ 25°C / 11550µS/cm @ 20°C fall outside the calibration range and as such are unaccredited.

Asbestos:

Asbestos in soil analysis is performed on a dried aliquot of the submitted sample and cannot guarantee to identify asbestos if only present in small numbers as discrete fibres/fragments in the original sample.

Stones etc. are not removed from the sample prior to analysis.

Quantification of asbestos is a 3 stage process including visual identification, hand picking and weighing and fibre counting by sedimentation/phase contrast optical microscopy if required. If asbestos is identified as being present but is not in a form that is suitable for analysis by hand picking and weighing (normally if the asbestos is present as free fibres) quantification by sedimentation is performed. Where ACMs are found a percentage asbestos is assigned to each with reference to 'HSG264, Asbestos: The survey guide' and the calculated asbestos content is expressed as a percentage of the dried soil sample aliquot used.

Predominant Matrix Codes:

1 = SAND, 2 = LOAM, 3 = CLAY, 4 = LOAM/SAND, 5 = SAND/CLAY, 6 = CLAY/LOAM, 7 = OTHER, 8 = Asbestos bulk ID sample. Samples with Matrix Code 7 & 8 are not predominantly a SAND/LOAM/CLAY mix and are not covered by our BSEN 17025 or MCERTS accreditations, with the exception of bulk asbestos which are BSEN 17025 accredited.

Secondary Matrix Codes:

 $A =$ contains stones, $B =$ contains construction rubble, $C =$ contains visible hydrocarbons, $D =$ contains glass/metal,

$E =$ contains roots/twigs.

Key:

IS indicates Insufficient Sample for analysis.

US indicates Unsuitable Sample for analysis.

NDP indicates No Determination Possible.

NAD indicates No Asbestos Detected.

N/A indicates Not Applicable.

Superscript # indicates method accredited to ISO 17025.

Superscript "M" indicates method accredited to MCERTS.

Subscript "A" indicates analysis performed on the sample as received.

Subscript "D" indicates analysis performed on the dried sample, crushed to pass a 2mm sieve

Please contact us if you need any further information.

Envirolab Deviating Samples Report

Units 7&8 Sandpits Business Park, Mottram Road, Hyde, SK14 3AR

Tel. **Example 2018 Tel. Example 2018 Example 2018 Example 2018 Example 2018**

Client: Energised Environments Ltd, 7 Dundas Street, Edinburgh, EH3 6QG **Project No:**

Date Received: 20/07568 09/09/2020 (am)

Project: Cumberhead West Wind Farm **Cool Box Temperatures** (°C): 15.4 **Clients Project No:** 2694

NO DEVIATIONS IDENTIFIED

If, at any point before reaching the laboratory, the temperature of the samples has breached those set in published standards, e.g. BS-EN 5667-3, ISO 18400-102:2017, then the concentration of any affected analytes may differ from that at the time of sampling.
FIGURES

Project Number: 2694

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