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Volume 7E Proposed Development (Onshore) Appendices

Appendix 7-4 Consultation Summary

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Acronyms and Abbreviations

AMSC	Approval of Matters Specified in Conditions
CEMP	Construction Environmental Management Plan
EIAR	Environmental Impact Assessment Report
HDD	Horizontal Directional Drilling
NVC	National Vegetation Classification
ONEC	Onshore Export Cable Corridor
PCL	Potentially Contaminated Land
PMP	Peat Management Plan
PPP	Planning Permission in Principle
RLB	Red Line Boundary
RAF	Royal Air Force

1 Consultation Summary

1.1 Stakeholder Engagement

1.1.1 Overview

1.1.1.1 The Scoping Report was submitted to Aberdeenshire Council in December 2022, who then circulated the report to relevant consultees. A Scoping Opinion was received from Aberdeenshire Council on 1 February 2023. Relevant comments from the Scoping Opinion specific to Geology, Soils and Contaminated Land are provided in Table 1-1.

Table 1-1: Scoping Opinion Responses

Consultee	Comment	Response
Aberdeenshire Council	Detailed survey work would be required to inform the EIAR. Following analysis of the aspects of the environment which would be likely to be significantly affected, a detailed assessment of the effects themselves would be required along with mitigation measures proposed.	The assessment of the Proposed Development (Onshore) on geology, soils and contaminated land is a wholly desk-based assessment, as intrusive ground investigation will be completed as part of the Approval of Matters Specified in Conditions (AMSC) stage. A Preliminary Risk Assessment is presented in Volume 7E, Appendix 7-1: Geo-Environmental Preliminary Risk Assessment.
Aberdeenshire Council	"Examples of the types of issues that should be addressed include: ▪ Climate Change ▪ Local Economic Effect ▪ Landscape Resource ▪ Soils and Geology ▪ Visual Amenity ▪ Ecology ▪ Nature Conservation ▪ European Protected Species ▪ Hydrology and Water Supplies ▪ Forestry and Tree Felling ▪ Transport and Traffic, including road safety issues and impact on the local road network during and after construction work ▪ Noise ▪ Cultural Heritage and Archaeology	Soils and geology have been addressed in Volume 5, Chapter 7: Geology Soils and Contaminated Land of the EIAR and the supporting Volume 7E, Appendix 7-1: Geo-Environmental Preliminary Risk Assessment. The geological and soil environment is discussed in Section 7.4.3 of Volume 5, Chapter 7: Geology Soils and Contaminated Land. Potential effects are discussed in Section 7.7 of Volume 5, Chapter 7: Geology Soils and Contaminated Land with mitigation measures and monitoring discussed in Section 7.10 of Volume 5, Chapter 7: Geology Soils and Contaminated Land. A summary of effects after the application of mitigation is presented in Section 7.11 of Volume 5, Chapter 7: Geology Soils and Contaminated Land.

Consultee	Comment	Response
	▪ Land Use ▪ Land Ownership ▪ Tourism and Recreation, including Footpaths ▪ Proposed Mitigation Measures"	An assessment of the potential impacts on agricultural land is presented in Volume 5, Chapter 2: Land Use.
Aberdeenshire Council	Section 11.4.7 of the Onshore Scoping Report mentions SEPA records of 2 not currently operational landfills, a former World War II airbase, and the possibility of contamination in urban and rural localities arising from land uses and activities. It should be noted that within the approximate boundary of the onshore scoping area, the Service records 1,048 potentially contaminated land [PCL]. Of that number, 16 are closed landfills – including the 2 recorded by SEPA.	Aberdeenshire Council contaminated land records have been considered as part of establishing the baseline contaminated land environment outlined in Section 7.4.3.24 of Volume 5, Chapter 7: Geology Soils and Contaminated Land and the Desk study in Volume 7E, Appendix 7-1: Geo-Environmental Preliminary Risk Assessment.
Aberdeenshire Council	It is noted that small pockets of peat are located in the south of the study area within the Substation Scoping Area. Avoidance of this area should be the first principle, however if this area is to be developed, information should be provided on the management of peat, including mitigation measures within the EIAR.	Design of the Proposed Development (Onshore), including both the Onshore Export Cable Corridor (ONEC) and the Onshore Substation Site, have been developed on an iterative basis to avoid areas of peat as far as practicable (this is discussed further in Volume 1, Chapter 6: Site Selection and Alternatives). Figure 7-4 in Volume 7E, Appendix 7-3: Geology, Soils and Contaminated Land Figures illustrates how site selection has sought to avoid an interface with areas of peat as far as possible. The site selection process responds to Policy 5c of NPF4, which states that development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for

Consultee	Comment	Response
		essential restructure (e.g. transmission infrastructure) and there is a specific locational need and no other suitable site. Where avoidance has not been possible, embedded and secondary mitigation applied to manage impacts on peat is provided in Section 7.5.6 of Volume 5, Chapter 7: Geology Soils and Contaminated Land
Aberdeenshire Council	For Table 7.2 of Chapter 7 [of the Onshore Scoping Report]: Whitehills to Melrose Coast SSSI and Windy Hills SSSI should be discussed in chapter 11 geology as their interests are Dalradian Supergroup metamorphic rocks and Quaternary of Scotland respectively	Whitehills to Melrose Coast SSSI and Windy Hills SSSI are not within the study area for the Geology Soils and Contaminated Land chapter (Volume 5, Chapter 7). Cullen to Stake Ness Coast SSSI is within the study area and is discussed in Section 7.4.3 of Volume 5, Chapter 7: Geology Soils and Contaminated Land.
Scottish Environment Protection Agency	Disturbance and re-use of excavated peat and other carbon rich soils: a. Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO2 to the atmosphere. Developments must aim to minimise this release."	The assessment of carbon emissions from peat is outwith the scope of the Geology, Soils and Contaminated Land chapter (Volume 5, Chapter 7), but is covered in Volume 6, Chapter 4: Greenhouse Gases. A demonstration of how the layout has been designed to avoid the disturbance of peat is provided in Volume 1, Chapter 6: Site Selection and Alternatives. The site selection process responds to Policy 5c of NPF4, which states that development proposals on peatland, carbon-rich soils and priority peatland habitat will only be

Consultee	Comment	Response
	b. The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas. c. The submission must include: a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland -Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems. b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included. d. To avoid delay and potential objection proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of	supported for essential restructure (e.g. transmission infrastructure) and there is a specific locational need and no other suitable site. Figure 7-4 in Volume 7E Appendix 7-3: Geology, Soils and Contaminated Land Figures illustrates how site selection has sought to avoid an interface with areas of peat as far as possible. Targeted peat probing was completed to inform the site selection process (survey areas are shown in Figure 7-4 in Volume 7E, Appendix 7-3: Geology, Soils and Contaminated Land Figures) and this data was used to inform the assessment of the area of peatland in proximity to the Onshore Substation. The peat probing was carried out in accordance with the Peatland Survey guidance (Scottish Government, Scottish Natural Heritage and SEPA, 2017[1]). An Outline Peat Management Plan (Application Document 7: Outline Peat Management Plan) has been prepared in support of the Planning Permission in Principle (PPP) for the OnTI which has been produced to address the potential requirement for excavation of peat and carbon-rich soils during construction. A detailed (intrusive) survey of peat presence and depth has been carried out where permission could be obtained (areas of mapped Class 1, 3 and 5 soils, see

Consultee	Comment	Response
	Waste and our Developments on Peat and Off-Site uses of Waste Peat. e. Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation. f. Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.	Figure 7-4, Volume 7E, Appendix 7-3: Geology, Soils and Contaminated Land Figures) as part of this Environmental Impact Assessment Report (EIAR). Permission was sought to investigate the remaining areas of Class 3 and 5 soils within the Red Line Boundary (RLB), but the Caledonia Offshore Wind Farm Limited (the Applicant) was not successful in obtaining the required landowner approvals. Intrusive investigation will be completed as part of the AMSC stage. Embedded and secondary mitigation applied to manage impacts on peat is provided in Section 7.5.6 of Volume 5, Chapter 7: Geology, Soils and Contaminated Land. Potential impacts on Groundwater Dependent Terrestrial Ecosystems are considered in Volume 5, Chapter 6: Hydrology and Hydrogeology. The assessment presented in this chapter has been undertaken with regard to the guidance listed in Table 7-1 of Volume 5, Chapter 7: Geology Soils and Contaminated Land.

1.1.1.2 Further consultation has been undertaken throughout the pre-application stage.

1.1.1.3 Table 1-2: Stakeholder Engagement Activities summarises the consultation activities carried out relevant to the assessment of Geology, Soils and Contaminated Land.

Table 1-2: Stakeholder Engagement Activities

Date	Consultee and Type of Consultation	Summary	Response
02/06/2023	Aberdeenshire Council	Spatial data for Potentially Contaminated Sites was provided by Aberdeenshire Council's Contaminated Land Department, following a formal request being submitted.	Aberdeenshire Council contaminated land records have been considered as part of establishing the baseline contaminated land environment outlined in Section 7.4.3. of Volume 5, Chapter 7: Geology Soils and Contaminated Land and the Desk study in Volume 7E, Appendix 7-1: Geo-Environmental Preliminary Risk Assessment.
25/09/2023	SEPA: Post-scoping engagement	SEPA noted in their consultation response that "minimising impacts on peat and peatland" is a key issue that should be addressed by the formal application.	A technical note was prepared by Arup in response to this consultation, to clarify the points raised by SEPA.
01/11/2023	SEPA: Post-scoping engagement	In their response to the Technical Note prepared by Arup, SEPA stated the following in relation to this chapter: "As a minimum we would expect peat probing to be undertaken at all possible Onshore Substation Sites in order for the 'worst case scenario' to be presented. Only in this way can any estimate of peat volumes and the assessment of impact on peat and carbon	The wider site selection process sought to avoid an interface with peat as far as possible. The percentage of the study area which interfaces with peatland is provided in Table 7-10 in Volume 5, Chapter 7: Geology, Soils and Contaminated Land. Targeted peat probing was completed to inform the site selection process and this data was used

Date	Consultee and Type of Consultation	Summary	Response
		balance be undertaken and demonstrate whether the project will comply with NPF4 Policy 5". "The EIAR will need to demonstrate, should any peat be excavated, how the proposal will comply with Policy 5 in terms of peat re-use. Peat volumes need to be established in order to identify how much peat needs to be considered in terms of re-use with areas of on or off-site re-use being identified. We would expect demonstration that peat re-use/restoration is achievable, i.e. landowner agreements for long term management of the peat will be possible."	to inform the assessment of the area of peatland in proximity to the Onshore Substations. There is an opportunity at detailed design stage to minimise the impact on peat through micrositing and an Outline Peat Management Plan (Application Document 7: Outline Peat Management Plan) has been prepared in support of the Planning Permission in Principle (PPP) for the OnTI which has been produced to address the potential requirement for excavation of peat and carbon-rich soils during construction.
23/01/2024	SEPA: Post-scoping engagement	<u>Additional comments received from SEPA in relation to Peat</u>: "Peat: We note and welcome the substation will no longer require the excavation of peat and confirm no further peat probing information for the substation area will be required if this remains the case. We welcome further peat probing will be undertaken should it be required along the cable route."	The wider site selection process sought to avoid an interface with peat as far as possible. Changes made to the OnTI RLB (after receipt of the SEPA post-scoping engagement response) meant that an area of Class 1 mapped peat was within the southern OnTI RLB. This area was subject peat probing and National Vegetation Classification (NVC) survey which confirmed that it is not supporting priority peatland habitat and is therefore not Class 1 or 2 peatland.

Date	Consultee and Type of Consultation	Summary	Response
			A detailed (intrusive) survey of peat presence and depth has been carried out where permission could be obtained (areas of mapped Class 1, 3 and 5 soils as shown in Figure 7-4, Volume 7E, Appendix 7-3: Geology, Soils and Contaminated Land Figures) as part of this Environmental Impact Assessment Report (EIAR). Permission was sought to investigate the remaining areas of Class 3 and 5 soils within the RLB, but the Caledonia Offshore Wind Farm Limited (the Applicant) was not successful in obtaining the required landowner approvals. Intrusive investigation will be completed as part of the AMSC stage. Embedded and secondary mitigation applied to manage impacts on peat is provided in Section 7.5.6. of Volume 5, Chapter 7: Geology Soils and Contaminated Land. Management and mitigation of potential impacts on the localised areas of mapped peaty soils within the OnTI RLB is detailed in the Construction Environmental Management Plan (CEMP) and in the Outline Peat Management

Date	Consultee and Type of Consultation	Summary	Response
			Plan (Application Document 7: Outline Peat Management Plan).
20/03/2024	Aberdeenshire Council	Further clarification was requested from Aberdeenshire Council as to how their Potentially Contaminated Sites database was compiled, and how it is used by Aberdeenshire Council. The response from the Council's Environment and Infrastructure Services department included the following key information: "[…] Data to compile the PCL overlay derives from available historic mapping, records of current and predecessor councils (e.g. waste management and petroleum licenses), aerial photography, roadside photography, site visits, complaints of pollution incidents, and findings of site investigations carried out under planning. The data is subject to the limitations of the source. […] The PCL overlay and associated data is used to carry out council duties under Part IIA of the Environmental Protection Act 1990, assess planning applications in respect of contaminated land,	Noted

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		and provide replies to environmental information requests."	
21/03/2024	Aberdeenshire Council	Information on Foot and Mouth disease burials or pyre sites was requested from Aberdeenshire Council. The Council's Environment and Infrastructure Services department responded to state that the Council do not hold this information.	No further action taken.
21/03/2024	SEPA	Additional comments received from SEPA in relation to Contaminated Land: "SEPA highlight the presence of the former Banff Airfield at NJ6190064300. Traces of Radium-226 may be present in the vicinity due to its former use. If any excavation is to take place within 1 km of the centre of this site a Phase 1 desktop study for land contamination should be submitted with any future planning application in which the likelihood of radioactive contamination should be assessed and whether any further detailed assessment is required. Ideally this desktop study should be accompanied by a walk over survey by an experienced practitioner."	The former Royal Air Force (RAF) Banff site was considered as part of the ONEC study (described in Volume 1, Chapter 6, Section 6.5.4), and the site was actively avoided during site selection. The OnTI RLB does not encroach into the RAF Banff site and no excavation will take place within the RAF Banff site. The centre of the RAF Banff site was determined at Grid Reference NJ62116 63933 using the boundary of the airfield site provided by Aberdeenshire Council, as listed in Section 7.4.2 of Volume 5, Chapter 7: Geology Soils and Contaminated Land. The centre of the site is 1.1km away from any areas of potential excavation associated with the Proposed

Date	Consultee and Type of Consultation	Summary	Response
			Development (Onshore). A cross check of the distance when the centre of the site is taken as the centre of the triangular area between the three runways confirms that it is also greater than 1km from the Proposed Development (Onshore). A radioactive contamination assessment is therefore not required as part of the Phase 1 study / Geo-Environmental Preliminary Risk Assessment.
21/03/2024	SEPA	Additional comments received from SEPA in relation to Peat: "SEPA are pleased to note that most large areas of peatland have been avoided through the design process. However, as the ONEC still passes through smaller areas of peat and as these small pockets are rare within this geographical area, SEPA ask that these are	The extents of peaty soils shown by the NatureScot mapping within the OnTI RLB are small. The mapped areas are shown to comprise mainly Class 4 (unlikely to be associated with peatland habitat and unlikely to include carbon-rich soils). Targeted peat probing was completed to inform the site selection process (the locations of peat survey are shown on Figure 7-4 in Volume 7E, Appendix 7-3: Geology, Soils and Contaminated Land Figures) and this data was used to inform the assessment of the area of peatland in proximity to the Onshore Substation. It is noted that the NatureScot map is a predictive tool and is not regarded as definitive.

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		avoided or HDD[i] drilling is used to pass under these unless strong justification is given as to why this will not be possible. Where proposals are on peatland or carbon rich soils SEPA expect an EIAR to include the following to address the requirements of NPF4 Policy 5: a) indicative layout plans showing all permanent and temporary infrastructure, with extent of excavation required, which clearly demonstrates how the mitigation hierarchy outlined in NPF4 has been applied. These plans should be overlaid on:	Management and mitigation of potential impacts on the localised areas of mapped peaty soils within the OnTI RLB will be detailed in the CEMP and the Outline Peat Management Plan (Application Document 7: Outline Peat Management Plan). Any required mitigation of impacts on peat will follow the mitigation hierarchy set out in Policy 5 of NPF4 (Scottish Government, 2023[4]).

[i] Horizontal Directional Drilling

Date	Consultee and Type of Consultation	Summary	Response
		i. peat depth survey (showing peat probe locations, colour coded using distinct colours for each depth category and annotated at a usable scale) ii. peat depth survey showing interpolated peat depths. iii. peatland condition mapping iv. NVC habitat mapping. b) an outline Peat Management Plan (PMP). c) an outline Habitat Management Plan. Detailed advice (a) Development design in line with the mitigation hierarchy In order to protect peatland and limit carbon emissions from carbon rich soils, the submission should demonstrate that proposals: ▪ Avoid peatland in near natural condition, as this has the lowest greenhouse gas emissions of all peatland condition categories; ▪ Minimise the total area and volume of peat disturbance. Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or	

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		the shallowest peat reasonably practicable. Avoid peat > 1m depth; ▪ Minimise impact on local hydrology; and ▪ Include adequate peat probing information to inform the site layout and demonstrate that the above has been achieved. As a minimum this should follow the requirements of Peatland Survey – Guidance on Developments on Peatland (2017)[1]. The Peatland Condition Assessment photographic guide[2] lists the criteria for each condition category and illustrates how to identify each condition category. This should be used to identify peatland in near natural condition and can be helpful in identifying areas where peatland restoration could be carried out. In line with the requirements of Policy 5d of NPF4, the development proposal should include plans to restore and/or enhance the site into a functioning peatland system capable of achieving carbon sequestration. Detailed advice (b) The Outline Peat Management Plan (PMP) should also include:	

Date	Consultee and Type of Consultation	Summary	Response
		▪ Information on peatland condition. ▪ Information demonstrating avoidance and minimisation of peat disturbance. ▪ Excavation volumes of acrotelmic, catotelmic and amorphous peat. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes. ▪ Proposals for temporary storage and handling. ▪ Reuse volumes in different elements of site reinstatement and restoration. Handling and temporary storage of peat should be minimised. Catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not suitable for use in verge reinstatement, reprofiling/ landscaping, spreading, mixing with mineral soils or use in bunds. Disposal of peat is not acceptable. It should be clearly demonstrated that all peat disturbed by the development can be used in site reinstatement (making good areas which have been disturbed by the development) or	

Date	Consultee and Type of Consultation	Summary	Response
		peatland restoration (using disturbed peat for habitat restoration or improvement works in areas not directly impacted by the development, which may need to include locations outwith the development boundary). Detailed advice (c) The Outline Habitat Management Plan should include: ▪ Proposals for reuse of disturbed peat in habitat restoration, if relevant. ▪ Details of restoration to compensate for the area of peatland habitat directly and indirectly impacted by the development. ▪ Outline proposals for peatland enhancement in other areas of the site. ▪ Monitoring proposals. To support the principle of peat reuse in restoration the applicant should demonstrate that they have identified locations where the addition of excavated peat will enhance the wider site into a functional peatland system capable of achieving carbon sequestration. The following information is required: ▪ Location plan of the proposed peatland re-use restoration area(s), clearly showing the size	

Date	Consultee and Type of Consultation	Summary	Response
		of individual areas and the total area to be restored. ▪ Photographs, aerial imagery, or surveys to demonstrate that the area identified is appropriate for peat re-use and can support carbon sequestration. This should include consideration of an appropriate hydrological setting and baseline peatland condition. In addition, if any proposed re-use restoration areas are outwith the ownership of the applicant, information should be provided to demonstrate agreement in principle with the landowner, including agreed timescales for commencement of the works, and proposed management measures to ensure the restored areas can be safeguarded in perpetuity as a peatland. NatureScot's technical compendium of peatland restoration techniques[3] provides a useful overview of the procedural and technical requirements for peatland restoration."	

18/4/24	Aberdeenshire Council/SEPA consulted as part of the formal pre-application process	There are over 260 potentially contaminated land sites within the site boundary. Of these PCL sites the following are of note in respect of the proposals: ▪ Former railway land crosses the site (hence across any potential cable route) in two places. ▪ There are four landfills and associated 250m consultation zones across the eastern corridor between Whitehills and Banff. ▪ The site of the former airfield, RAF Boyndie, occupies much of the western corridor (west of Whitehills). SEPA highlight the presence of the former Banff Airfield at NJ6190064300. Traces of Radium-226 may be present in the vicinity due to its former use. If any excavation is to take place within 1 km of the centre of this site a Phase 1 desktop study for land contamination should be submitted with any future planning application in which the likelihood of radioactive contamination should be assessed and whether any further detailed assessment is required. Ideally this desktop study should be accompanied by a walk over survey by an experienced practitioner. Should the proposals be the subject of a planning application or environmental impact	Aberdeenshire Council contaminated land records have been considered as part of establishing the baseline contaminated land environment outlined in Section 7.4.3.24 of Volume 5, Chapter 7: Geology Soils and Contaminated Land and the Desk study in Volume 7E, Appendix 7-1: Geo-Environmental Preliminary Risk Assessment. The boundaries of the former RAF Banff site were obtained as part of the site selection (described in Volume 1, Chapter 6: Site Selection and Alternatives), and the site was actively avoided during site selection. The OnTI RLB does not encroach into the RAF Banff site. The centre of the RAF Banff site was determined at Grid Reference NJ62116 63933 using the boundary of the airfield site provided by Aberdeenshire Council, as listed in Section 7.4.2 of Volume 5, Chapter 7: Geology Soils and Contaminated Land. The centre of the site is 1.1km away from any areas of potential excavation associated with the Proposed Development (Onshore). A cross check of the distance when the centre of the site is taken as the centre of the triangular area between the three runways confirms that it is also greater than 1km from the Proposed Development (Onshore). A radioactive contamination assessment is therefore not required as part of

Date	Consultee and Type of Consultation	Summary	Response
		assessment be carried out contamination issues will require assessment.	the Phase 1 study / Geo-Environmental Preliminary Risk Assessment.

1.2 References

[1] Scottish Government, Scottish Natural Heritage, SEPA (2017) 'Peatland Survey. Guidance on Developments on Peatland', on-line version only. Available at: https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2018/12/peatland-survey-guidance/documents/peatland-survey-guidance-2017/peatland-survey-guidance-2017/govscot%3Adocument/Guidance%2Bon%2Bdevelopments%2Bon%2Bpeatland%2B-%2Bpeatland%2Bsurvey%2B-%2B2017.pdf (Accessed:19/09/2024).

[2] Birnie, R. Taylor, E., Smyth, M-A. (no date) 'Peatland Condition Assessment'. Available at: https://www.nature.scot/sites/default/files/2023-02/Guidance-Peatland-Action-Peatland-Condition-Assessment-Guide-A1916874.pdf (Accessed 19/09/2024).

[3] NatureScot (no date) 'Peatland Action – Technical Compendium'. Available at: https://www.nature.scot/doc/peatland-action-technical-compendium (Accessed 19/09/2024).

[4] Scottish Government (2023) 'National Planning Framework 4'. Available at: https://www.gov.scot/publications/national-planning-framework-4/ (Accessed: 19/09/2024).

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