Appendix 8.3: Outline Peat Management Plan

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1 Introduction

This appendix details the updated peat excavation and reuse calculations for the Revised Layout. The calculations for the Original Layout, as well as the objectives, methodology and references, are detailed in **Appendix 8.3: Outline Peat Management Plan (OPMP)** of the EIA Report.

This appendix should be read in conjunction with **AI Chapter 8: Geology, Hydrology, Hydrogeology and Peat** of the Additional Information (AI) Report.

The Proposed Development has been altered and now comprises 12 turbine locations with a blade tip height of up to 200 m, Battery Energy Storage System (BESS), associated access tracks, associated infrastructure and ancillary development.

The total area of the Proposed Revised Development infrastructure (footprint), including existing tracks, is 277,597 m^2 (permanent infrastructure footprint and temporary infrastructure including earthworks), which has been determined from ArcGIS in support of calculating excavated peat volumes only.

The revised design of the Proposed Development has been undertaken to avoid areas of deep peat as much as possible to limit peat excavation and to limit the potential for peat slide, as discussed in **AI Chapter 2: The Revised Proposed Development** of the AI Report.

1.1 Peat Survey Results

The details of the various peat surveys completed, the methodology and data collected to date are presented in **AI Appendix 8.2: Peat Survey Report**.

Following adjustment of the layout post-EIA submission, a further 1,499 probes were undertaken by Fluid over several site visits between October 2025 and November 2025. Each probe measured the depth of penetration and the potential substrate at the limit of penetration (see **AI Appendix 8.2: Peat Survey Report** and **AI Figure 8.8: Peat Depth of Penetration**).

Including the additional surveys undertaken since the submission of the original EIA Report, a total of 10,097 probes were undertaken across the Site. A total of 2,234 probes (22.1%) recorded depths of 0.5 m or less (no peat), 2,831 probes (28.0%) recorded depths of penetration between 0.5 m and 1.0 m and 5,032 probes (49.8%) recorded depths of penetration >1.0 m, as shown in **Table 1: Depth of Penetration Distribution**.

Table 1: Depth of Penetration Distribution

Depth Range (m)	Number of Probes	Percentage of Probes
0 – 0.5	2,234	22.1%
0.5 - 1.0	2,831	28.0%
1.0 – 1.5	2,036	20.2%
1.5 - 2.0	2,280	22.6%
2.0 – 3.0	700	6.93%
3.0 – 4.0	10	0.10%
4.0 – 5.0	2	0.02%

Depth Range (m)	Number of Probes	Percentage of Probes
5.0 – 6.0	3	0.03%
>6	1	0.01%
Total	**10,097**	**100%**

The depth of penetration at each probe location within the Site is presented on **AI Figure 8.8** of the AI Report.

Based on the data collected an interpreted peat depth map (**AI Figure 8.9**) was produced to demonstrate the variation in peat across the Site and at the various infrastructure locations. A comparison of the peat depth with the infrastructure footprint is presented in **Table 2**.

Table 2: Peat Penetration Depth across the Revised Infrastructure Footprint

Depth Range (m)	Peat depth distribution across infrastructure (m^2)	Peat depth percentage distribution across infrastructure
0 to 0.5 (no peat)	47,117	16.98%
>0. 5 – 1.0	107,620	38.77%
>1.0 – 1.5	76,697	27.63%
>1.5 – 2.0	40,527	14.60%
>2.0 - 3.0	5,603	2.02%
Total	**277,565**	**100%**

These data indicate that peat (>0.5 m depth) is present across 83.0% of the Proposed Development infrastructure and no peat (0 – 0.5 m depth) is present across 16.98% of the Proposed Development infrastructure. The OPMP is therefore only concerned with the 83.0% of the infrastructure that overlies peat.

This is an improvement over the Original Layout where peat (>0.5 m depth) was present across 86.06% of the Original Proposed Development infrastructure and peat was absent across only 13.94% of the Original Proposed Development infrastructure. It is also noted that the original Proposed Development had a larger footprint.

2 Peat Excavation Areas and Assumptions

The Revised Proposed Development infrastructure and dimensions used in the peat balance calculations are summarised in **Table 3**. These are calculated exactly from the shapefiles of each infrastructure area.

Table 3: Infrastructure Dimension Proposed Revised Development

Infrastructure	Dimensions	Area (m^2)
12 Turbine and Crane Hardstanding Areas (permanent)	Approx Rectangle 35 m x 100 m	39,322

Infrastructure	Dimensions	Area (m^2)
12 Turbine and Crane Hardstanding Areas and Earthworks (temporary)	Irregular shape	95,328
Construction Compound and Earthworks	Rectangle 30 m x 60 m, with irregular earthworks	4,568
Borrow pit, SS and Earthworks	Rectangle 30 m x 50 m, with irregular earthworks	24,543
Standard Track and earthworks	5.5 m x 9,310 m, with irregular earthworks	106,908
Floating Track and earthworks	5.5 m x 800 m with irregular earthworks	6,928
Total		**277,597**

3 Excavation Volume Estimates

3.1 Excavated Volumes

Peat excavation volumes associated with the Revised Development have been calculated using the GIS package QGIS based on the data in **Table 3** these further assumptions:

- A contour map of assumed peat depth based on interpolation of values from probing across the site (shown in **AI Figure 8.9** of the AI Report).
- Dimensions of the proposed areas for excavation for site infrastructure on peat of >0.5m based on the Final layout shape files provided (shown in **AI Figure 8.9** of the AI Report) and detailed in **Table 3**.
- An estimated acrotelm depth of 0.11m across infrastructure area where peat (>0.5 m organic soil) is present based on the peat core data.
- An estimated catotelm thickness of the average depth of the peat minus the acrotelm (0.11m) across infrastructure areas where peat is present, and based on the peat core data.
- An assumption that the probe depth is representative of the actual depth of the peat.
- Any peat excavated for cable trenches is stored adjacent to the trench while the track is laid and then replaced, therefore this volume is not applicable to the excavated volume.

Using the interpreted peat depth contour map (**AI Figure 8.9 Estimated Peat Depth**), the volumes of peat that would be excavated during construction were calculated based on the final layout infrastructure dimensions (ArcGIS shapefiles) as shown in **Table 3**. These calculations produced the following volume estimates and are summarised in **Table 4:**

- A total volume of peat to be excavated of 248,903 m^3

  This comprises:

- Total volume of acrotelm which will be excavated = 24,591 m^3
- Total volume of catotelm which will be excavated = 224,312 m^3.

These values are estimates based on the available data and the above assumptions.

Table 4: Summary of Excavated Peat Volumes Based on Actual Footprint

Infrastructure	Infrastructure area (m^2)	Average peat depth over infrastructure area (m)	Percentage of infrastructure with >0.5 m depth of peat	Area of infrastructure with >0.5 m depth of peat (m^2)	Average peat depth over area of infrastructure with >0.5 m depth of peat (m)	Volume of peat excavated (m^3)	Volume of acrotelm peat excavated (m^3)	Volume of catotelm peat excavated (m^3)
Turbine and Crane Hardstanding 1 (Permanent)	3,284	0.67	81.0	2,660	0.74	1,960	293	1,668
Temporary Hardstanding 1 and Earthworks	6,520	0.62	64.7	4,216	0.79	3,322	464	2,858
Turbine and Crane Hardstanding 2 (Permanent)	3,284	1.18	99.8	3,278	1.18	3,875	361	3,514
Temporary Hardstanding 2 and Earthworks	7,149	1.31	99.6	7,123	1.32	9,367	784	8,583
Turbine and Crane Hardstanding 3 (Permanent)	3,283	1.10	98.6	3,238	1.11	3,600	356	3,244
Temporary Hardstanding 3 and Earthworks	5,183	0.76	70.4	3,650	0.93	3,394	402	2,992
Turbine and Crane Hardstanding 6 (Permanent)	3,284	0.78	91.6	3,007	0.82	2,467	331	2,136

Infrastructure	Infrastructure area (m^2)	Average peat depth over infrastructure area (m)	Percentage of infrastructure with >0.5 m depth of peat	Area of infrastructure with >0.5 m depth of peat (m^2)	Average peat depth over area of infrastructure with >0.5 m depth of peat (m)	Volume of peat excavated (m^3)	Volume of acrotelm peat excavated (m^3)	Volume of catotelm peat excavated (m^3)
Temporary Hardstanding 6 and Earthworks	10,941	0.83	92.3	10,094	0.87	8,746	1,110	7,636
Turbine and Crane Hardstanding 7 (Permanent)	3,236	0.96	98.9	3,201	0.97	3,092	352	2,740
Temporary Hardstanding 7 and Earthworks	10,148	1.22	99.9	10,139	1.22	12,369	1,115	11,254
Turbine and Crane Hardstanding 8 (Permanent)	3,284	0.87	98.9	3,249	0.88	2,848	357	2,490
Temporary Hardstanding 8 and Earthworks	9,317	0.92	87.8	8,177	1.00	8,178	899	7,279
Turbine and Crane Hardstanding 9 (Permanent)	3,267	1.32	98.9	3,232	1.33	4,304	356	3,949
Temporary Hardstanding 9 and Earthworks	8,581	1.52	97.9	8,398	1.55	13,013	924	12,089

Infrastructure	Infrastructure area (m^2)	Average peat depth over infrastructure area (m)	Percentage of infrastructure with >0.5 m depth of peat	Area of infrastructure with >0.5 m depth of peat (m^2)	Average peat depth over area of infrastructure with >0.5 m depth of peat (m)	Volume of peat excavated (m^3)	Volume of acrotelm peat excavated (m^3)	Volume of catotelm peat excavated (m^3)
Turbine and Crane Hardstanding 10 (Permanent)	3,284	0.99	99.8	3,277	0.99	3,250	360	2,890
Temporary Hardstanding 10 and Earthworks	7,450	1.10	99.4	7,404	1.10	8,154	814	7,340
Turbine and Crane Hardstanding 11 (Permanent)	3,284	1.55	99.2	3,258	1.56	5,083	358	4,725
Temporary Hardstanding 11 and Earthworks	5,207	1.50	98.7	5,140	1.52	7,802	565	7,237
Turbine and Crane Hardstanding 12 (Permanent)	3,284	0.64	68.0	2,233	0.75	1,680	246	1,434
Temporary Hardstanding 12 and Earthworks	7,814	0.70	75.1	5,872	0.82	4,826	646	4,180
Turbine and Crane Hardstanding 13 (Permanent)	3,264	1.41	96.9	3,164	1.45	4,584	348	4,236

Infrastructure	Infrastructure area (m^2)	Average peat depth over infrastructure area (m)	Percentage of infrastructure with >0.5 m depth of peat	Area of infrastructure with >0.5 m depth of peat (m^2)	Average peat depth over area of infrastructure with >0.5 m depth of peat (m)	Volume of peat excavated (m^3)	Volume of acrotelm peat excavated (m^3)	Volume of catotelm peat excavated (m^3)
Temporary Hardstanding 13 and Earthworks	7,715	1.42	95.7	7,382	1.47	10,815	812	10,003
Turbine and Crane Hardstanding 14 (Permanent)	3,284	0.41	22.0	723	0.70	503	80	423
Temporary Hardstanding 14 and Earthworks	9,303	0.58	55.6	5,172	0.75	3,898	569	3,329
Construction Compound 1	4,372	0.33	26.2	1,144	0.80	915	126	789
Construction Compound 1 Earthworks	196	0.67	52.0	102	1.13	116	11	104
Borrow pit &SS	15,006	0.81	82.0	12,307	0.90	11,119	1,354	9,765
Borrow pit & SS Earthworks	9,537	0.73	74.8	7,138	0.86	6,144	785	5,359
Floating Track	0	0.00	0.0	0	0.00	0	0	0
Floating Track Earthworks	0	0.00	0.0	2,148	0.00	0	0	0

Infrastructure	Infrastructure area (m^2)	Average peat depth over infrastructure area (m)	Percentage of infrastructure with >0.5 m depth of peat	Area of infrastructure with >0.5 m depth of peat (m^2)	Average peat depth over area of infrastructure with >0.5 m depth of peat (m)	Volume of peat excavated (m^3)	Volume of acrotelm peat excavated (m^3)	Volume of catotelm peat excavated (m^3)
Standard Track	58,335	0.97	77.7	45,338	1.17	52,861	4,987	47,874
Standard Track Earthworks	48,573	1.01	82.8	40,240	1.16	46,618	4,426	42,191
Total	**270,669**			**225,704**		**248,903**	**24,591**	**224,312**

Note: where rows do not exactly add up this is due to rounding up of values.

3.2 Peat Sensitivity

The sensitivity of the peat is determined by both the depth and the condition of the peat, as heavily eroded, drained or afforested peat has little carbon within the upper layer. This is presented in detail in **Chapter 8: Hydrology, Geology, Hydrogeology and Peat**.

The sensitivity of peat across individual infrastructure is also considered and is detailed below in **Table 5**.

Table 5: Peat Sensitivity

Peat Presence	Peat Condition	Infrastructure	Sensitivity
No Peat	-	Turbine and Crane Hardstanding 14 (Permanent), Construction Compound 1,	Low
Peat <1m	Heavily eroded/drained	Turbine and Crane Hardstanding 1 (Permanent), Temporary Hardstanding 1 and Earthworks, Turbine and Crane Hardstanding 6 (Permanent), Turbine and Crane Hardstanding 12 (Permanent), Temporary Hardstanding 14 and Earthworks, Borrow Pit and Substation, Borrow Pit and Substation Earthworks	Low
Peat 1-2m	Heavily eroded/drained	Turbine and Crane Hardstanding 2 (Permanent), Temporary Hardstanding 2 and Earthworks, Turbine and Crane Hardstanding 3 (Permanent), Temporary Hardstanding 3 and Earthworks, Temporary Hardstanding 6 and Earthworks ,Turbine and Crane Hardstanding 7 (Permanent), Temporary Hardstanding 7 and Earthworks, Turbine and Crane Hardstanding 8 (Permanent), Temporary Hardstanding 8 and Earthworks, Turbine and Crane Hardstanding 9 (Permanent), Temporary Hardstanding 9 and Earthworks, Turbine and Crane Hardstanding 10 (Permanent), Temporary Hardstanding 10 and Earthworks, Turbine and Crane Hardstanding 11 (Permanent), Temporary Hardstanding 11 and Earthworks, Temporary Hardstanding 12 and Earthworks, Turbine and Crane Hardstanding 13 (Permanent), Temporary Hardstanding 13 and Earthworks, Floating Track, Floating Track Earthworks Standard Track, Standard Track Earthworks	Medium
Peat >2m	Heavily eroded/drained	None	High

4 Peat Restoration Areas and Reuse Volumes

4.1 Peat Restoration Areas

The peat onsite is experiencing erosion in numerous locations and will continue to do so without intervention. There are numerous gullies of varying size which are draining and dewatering the peatlands, and transferring peat particles away from the site and into watercourses. There are areas of bare peat at the base of the gullies, and at the margins peat is often exposed and is resulting in continued gradual degradation.

It is considered that the best approach to restore these areas is through the infill of the gullies with translocated peat, and this is included as one of the proposals for enhancing peatlands within **AI Appendix 6.5 Outline HEMP** of the EIA Report. Where the base of the gullies are vegetated, the vegetation should be carefully lifted off and set to one side and the excavated peat from other areas of the site placed in each gully and the vegetated layer reinstated on top. If necessary, damming structures may be required to assist stabilisation and in a number of locations the Proposed Development infrastructure will also act as a down gradient barrier to retain this peat.

There are a number of advantages with this type of restoration such as:

- The excavated peat can be placed directly into the restoration areas so there is no storage required where the peat would be subject to weathering, dewatering and erosion.
- There are numerous areas of peat restoration identified across the site so the distances from excavation areas to restoration areas can be minimised; and
- The areas of peat on site are diminishing and if not protected will continue to gradually reduce and become more vulnerable.

There are numerous areas that have been identified from site surveying and aerial imagery interpretation that offer the potential for peat restoration as presented in **AI Figure 8.10: Peat Restoration Areas** in the EIA Report. The restoration depths have been determined from examination on site and LIDAR data. It should be noted that peat cutting across the Site is widespread and there are more opportunities for peat reuse on the Site than those that have been presented.

4.2 Peat Reuse Volumes

From **Table 4** above, the volume of peat that will be removed by excavation of the infrastructure is 24,591 m^3 of acrotelm, and 224,312 m^3 of catotelm.

This volume of peat will be reused around the site in the following areas, as detailed in **Table 6** and presented on **AI Figure 8.10**:

- Reinstatement of temporary crane hardstanding and earthworks areas that are on and adjacent to peat. This covers an area of 95,328 m^2.
- Reinstatement of the Temporary Construction Compound 1 (and earthworks) that are on and adjacent to peat. This covers an area of 4,568 m^2.
- Reinstatement of the Floating Track Earthworks and Standard Track Earthworks that are on or adjacent to peat. This covers areas of 1,074 m^2 and 20,120 m^2 respectively.
- Reinstatement of the Substation Earthworks that are on or adjacent to peat behind a mineral bund. This covers an area of 9,604 m^2.
- Placement of peat upgradient of areas of mineral bunds (fill) associated with the Proposed Infrastructure as presents on **AI Figure 8.11**.

Table 6 Estimated Potential Reuse Volumes for Excavated Peat

Reuse Type	Reuse Summary	Acrotelm volume (m3)	Catotelm volume (m3)	Total Volume (m3)
Temporary Hardstanding 1 and Earthworks	Backfill temporary area of 6,520m^2 where peat was previously located / is adjacent	**442**	**3,576**	**4,018**
Temporary Hardstanding 2 and Earthworks	Backfill temporary area of 7,149m^2 where peat was previously located / is adjacent	**1,031**	**8,342**	**9,373**
Temporary Hardstanding 3 and Earthworks	Backfill temporary area of 5,183m^2 where peat was previously located / is adjacent	**435**	**3,521**	**3,957**
Temporary Hardstanding 6 and Earthworks	Backfill temporary area of 10,941m^2 where peat was previously located / is adjacent	**994**	**8,046**	**9,040**
Temporary Hardstanding 7 and Earthworks	Backfill temporary area of 10,148m^2 where peat was previously located / is adjacent	**1,361**	**11,012**	**12,373**
Temporary Hardstanding 8 and Earthworks	Backfill temporary area of 9,317m^2 where peat was previously located / is adjacent	**942**	**7,625**	**8,567**
Temporary Hardstanding 9 and Earthworks	Backfill temporary area of 8,581m^2 where peat was previously located / is adjacent	**1,438**	**11,631**	**13,068**
Temporary Hardstanding 10 and Earthworks	Backfill temporary area of 7,450m^2 where peat was previously located / is adjacent	**899**	**7,273**	**8,172**
Temporary Hardstanding 11 and Earthworks	Backfill temporary area of 5,207m^2 where peat was previously located / is adjacent	**861**	**6,966**	**7,827**
Temporary Hardstanding 12 and Earthworks	Backfill temporary area of 7,814m^2 where peat was previously located / is adjacent	**601**	**4,859**	**5,459**
Temporary Hardstanding 13 and Earthworks	Backfill temporary area of 7,715m^2 where peat was previously located / is adjacent	**1,202**	**9,722**	**10,923**
Temporary Hardstanding 14 and Earthworks	Backfill temporary area of 9,303m^2 where peat was previously located / is adjacent	**594**	**4,809**	**5,404**
Construction Compound 1	Backfill temporary area of 4,372m^2 where peat was previously located / is adjacent	**481**	**3,891**	**4,372**

Reuse Type	Reuse Summary	Acrotelm volume (m3)	Catotelm volume (m3)	Total Volume (m3)
Construction Compound 1 Earthworks	Backfill temporary area of 196m^2 where peat was previously located / is adjacent	**22**	**5,438**	**196**
Borrow Pit and Substation Earthworks	Backfill temporary area with 1.5m depth of peat in the area of 9,537m^2 where peat was previously located / is adjacent behind a mineral bund	**594**	**4,809**	**14,306**
Floating Track Earthworks	Backfill temporary area with 0.5m depth of peat in the area of 2,148m^2 where peat was previously located / is adjacent	**22**	**174**	**1,074**
StandardTrack Earthworks	Backfill temporary area with 0.5m depth of peat in the area of 40,240m^2 where peat was previously located / is adjacent	**1,574**	**12,732**	**20,120**
Peat upgradient of track between T9 and BP	Placement of peat behind track mineral bund in 1m thickness over area of 3,178 m^2	350	2,828	3,178
Peat upgradient of track between T9 and BP	Placement of peat behind track mineral bund in 1m thickness over area of 2,474 m^2	267	2,157	2,423
Peat upgradient of track between T8 and BP	Placement of peat behind track mineral bund in 1m thickness over area of 1,736 m^2	423	3,419	3,841
Peat upgradient of existing track to north of T13	Placement of peat behind track mineral bund in 1m thickness over area of 1,414m^2	191	1,544	1,735
Peat infill in numerous gullies	Placement of peat in gullies to 0.75 m thickness over an area of 29,660 m^2	2,447	19,798	22,245
Open ground (bund and fill) areas	Placement of peat in eroded peat areas where bunding will allow peat to be placed within the bunded area between 0.5 m and 1.25 m thickness over 80,000 m^2.	8,687	19,798	78,969
Total		**27,570**	**223,070**	**248,905**

The re-use of the excavated peat has taken a conservative approach in terms of the areas that will be possible to restore and the depths achievable.

4.3 Net Peat Balance

The total volume of peat predicted to be excavated, 248,903 m^3, exceeds the intended reuse volume within the temporary infrastructure area by 110,654 m^3. The remaining excavated peat will be used in bunded cells in four areas upgradient of raised infrastructure, as presented in

Table 6, and across the Site for peat restoration as presented in **Appendix 6.5 Outline HEMP and on AI Figure 8.11,** which totals 112,391 m^3 and achieves a balance and demonstrates that all excavated peat can be appropriately reused on site.

The excavated peat volumes and reuse volumes are summarised in **Table 7** below.

Table 7 Net Peat Balance

	Acrotelm volume (m^3)	Catotelm volume (m^3)	Total Volume (m^3)
Excavated Peat	24,591	224,312	248,903
Peat Reuse	27,570	223,070	250,640
Total Balance	**2,979**	**-1,242**	**1,737**

5 Summary

A high-density grid of 10,097 peat probes and associated cores has been completed at all site infrastructure between November 2023 and November 2025 to obtain a detailed understanding of peat variability, depth and characteristics at the site.

Peat is present across 83% of the survey area and there are areas where peat is several metres deep. The infrastructure has avoided the deepest areas of peat where possible with peat >1.0 m depth present across 43% of the Proposed Development infrastructure.

The total volume of excavated peat associated with the infrastructure footprint and the excavated slopes and drains has been calculated at 248,903 m^3 with 24,591 m^3 of acrotelmic peat and 224,312 m^3 of catotelmic peat.

The potential reuse of excavated peat has been calculated based on SEPA guidance within the temporary infrastructure, which results in an excess of 110,654 m^3 of excavated peat which will be reused in bunded cells in areas upgradient of raised infrastructure and in an extensive peat restoration program as presented in **Appendix 6.5 Outline Habitat Enhancement Management Plan**. This program of restoration is focused on improving the condition of the peat across the site and reversing the current process of peat loss and degradation.

Based on the peat depth, characteristics and distribution investigations undertaken across the development area and the final layout, a surplus of peat is not expected to be generated by the Proposed Development. All estimated excavated peat is planned for re-use for restoration work during the construction and post-construction phases of the Proposed Development.

Further investigations will be undertaken prior to works commencing to confirm peat depth, distribution and characterisation. The additional survey data will be used to inform any micro-siting, and potentially further reduce the volume of peat extracted. The peat management plan (PMP) will be further updated using the additional survey data and detailed infrastructure

design. The detailed PMP will be approved by The Highland Council in consultation with SEPA as part of the CEMP pursuant to the imposition of a planning condition.

The PC will maintain a record of actual peat volumes excavated and the subsequent peat re-use to compare the predicted and actual peat volumes. This record during the construction, operation, decommissioning and restoration phases of the Proposed Development will be made available for review by regulators as and when required.

6 References

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