# APPENDIX 6.4: SCOPING OPINION

Aberdeenshire COUNCIL

Our Ref: ENQ/2024/0903

Your Ref:

Ask for: James Hewitt

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Scottish And Southern Electricity Networks

Inveralmond House

200 Dunkeld Road

Perth

PH1 3AQ

Dear Sir/Madam

**The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017**

**Proposal: Scoping Opinion for Erection of 400kV Substation and Associated Infrastructure**

**Site: Land At Mains Of Greens, Cuminestown, Turriff, Aberdeenshire, AB53 5YQ**

I refer to your request for a scoping opinion for the above proposal. I am now in receipt of all the necessary consultation responses and I can now offer a scoping opinion under Regulation 17 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Regulations).

Schedule 4 of the Regulations states the information which should be included in an Environmental Impact Assessment Report (EIA Report). These guidelines offer the backbone to the structure of an EIA Report and should be used as the basis for your submission.

In order to make an assessment of the above information there are specific criteria and guidance set out in Schedule 4 of the Regulations. In particular, these include characteristics of the development, an outline of any alternative options/sites and the main reasons for the options/sites chosen.

Environmental issues are of obvious key importance such as those aspects of the environment that would be likely to be significantly affected. Detailed survey work would be required to inform the EIA Report. 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.

Consultation

In the preparation of this response, consultation has been undertaken with key stakeholders. A summary of their comments is contained below.

*Internal*

**Environment and Infrastructure Services (Archaeology)** confirms that it is satisfied with the proposed methodology outlined in section 7.5 but would add that potential Cultural Heritage impacts along the proposed transportation/construction on the route are included in the assessment. I can confirm that the issues Scoped Out (Section 7.6)

**Environment and Infrastructure Services (Built Heritage)** consider the proposed approach to be acceptable.

Built heritage note that it is generally acknowledged that setting can often be important in the way historic cultural assets are experienced and appreciated by the wider population. The Planning Service must therefore always take into account the backdrop of conservation areas, designed landscapes and listed buildings when evaluating the potential impact of any future development. The overriding premise is to ensure that any proposal does not undermine important views of a nationally designated historic asset or impinge on their immediate surroundings.

The Built Environment Team initial assessment would suggest that the development of the identified site should not undermine the setting of any listed building, conservation area or designed landscape. This judgement is based on the evaluation of the surrounding landform along with the distance of the proposed 400kv substation and associated infrastructure from any historic cultural assets. A viewpoint that aligns with the findings of the Scoping Report which concludes that there is limited potential for the development to impact on any nationally designated heritage asset.

In conclusion the Built Heritage Team are of the view that, the proposed location of the substation does not raise immediate concern with respect to impact on the historic built environment.

**Environment and Infrastructure Services (Contaminated Land)** notes prior contaminative uses of the site (sheep wash, timber/threshing mill and dam at Mains of Greens) which may impact the proposed site use.

The EIA should include an assessment of the risks arising from the prior site use to the proposed site use.

**Environment and Infrastructure Services (Environmental Health)** has provided advice on the expected scope of assessment which is detailed below:

Noise Impact Assessment

The applicant is required to provide a Noise Impact Assessment to predict the impact on sensitive receptors and specify any necessary control measures. The assessment should be undertaken in accordance with BS4142:2019 for external noise to achieve a low impact when compared to background LA90 and NR25 and NR20 Curve assessment for internal noise during the daytime and night time respectively. The specific methodology must be agreed with the Environmental Health Service prior to the undertaking of the noise impact assessment.

Once the noise impact assessment has been submitted, it will be subject to review by the Environmental Health Service to consider the potential impact of the development on nearby receptors. Only then, will suitable planning conditions be considered.

A ‘Low level of Impact’ with a Rating Level Limit of <5dB above background LA90 in all settings is envisioned to ensure adverse impacts are minimised.

Construction Environment Management Plan

This Service has considered the risk associated with a number of environmental aspects associated with the construction phase which fall under the remit of this Service, primarily; fugitive dust emissions, construction noise and vibration and artificial light impact and is satisfied that separate assessment are not required in this instance.

Instead, these matters should be addressed within the proposed Construction Environment Management Plan (CEMP) to the satisfaction of this Service, detailing the site-specific controls and how these will be implemented in practice.

Private Water Supplies

The proposed development may impact on private water supplies within the area. The applicant must carry out an appropriate assessment on the private supplies that could be affected and ensure mitigation measures are introduced.

Details of the private supplies within the area can be accessed via FOI requests

**Environment and Infrastructure Services (Flood Risk and Coastal Protection)** have provided advice in relation to information requirements. The advice states that:

1. Section 8.2.18 and 8.2.19 of the Scoping Report acknowledges the potential flood risk associated with the site;

2. A Drainage Impact Assessment, prepared in accordance with Council Guidelines would be required. This should cover all potential phases of the application (noted that this is proposed in section 8.5 of the Scoping report);

3. If surface water soakaways are to be used to disperse of surface water; testing and sizing calculations should be done by a suitably competent person and in accordance with BRE Digest 365 or Ciria Project Report 23. Consideration should also be made to the location of the soakaways to ensure a minimum distance of 5m from any building foundations or boundaries;

4. If infiltration testing proves that ground is impervious then suitable attenuation calculations should be provided to prove that on-site surface water drainage system has adequate storage capacity for a 30 year return period rainfall event. Prior to a controlled discharge into either an available watercourse or public sewer (to be agreed with Scottish Water), controlled as a minimum to the pre-development runoff rate. As such, the pre-development runoff rate should be confirmed and a reduction made for any areas not included in the drainage design i.e. areas within the site application boundary that are to be left undeveloped;

5. Soakaway or Attenuation System construction details to be provided (including discharge control if necessary);

6. A statement on how future maintenance of the proposed drainage system will be performed and confirmation of who will be responsible;

7. Confirmation that any existing site or field drainage will be located and suitably altered, if indeed disturbed;

8. All calculations must be approved and certified by a suitably qualified person;

9. To fully consider flood risk to the site the applicant will need to submit a Flood Risk Assessment (FRA) which must consider flood risk from all sources. This is to be

undertaken in accordance with the current version of SEPA's 'Technical Flood Risk Guidance for Stakeholders – SEPA requirements for undertaking a Flood Risk Assessment (noted that this is proposed in section 8.5 of the Scoping report);

10. We suggest that SEPA be consulted as part of the production of any FRA and DIA associated with the proposal.

**Environment and Infrastructure Services (Natural Heritage)** consider the range surveys and topics in respect of terrestrial ecology to be acceptable. It is noted that it is proposed that mitigation will be considered throughout the EIA and that consideration of potential significant impacts will be used to influence the siting of infrastructure and construction access to avoid or minimise and effects.

In respect of trees/forestry, the potential impact of the proposal on an area of woodland within the red line site has been considered separately within the EIA scoping report. The focus will be on the resilience of the woodland and potential impacts on the infrastructure on site as well as compensatory planting. Secondary issues relating to effects on ecological interests, landscape, hydrology etc will be considered within their respective chapters of the EIA. This approach is acceptable.

**Environment and Infrastructure Services (Roads Development)** have no comment to make in relation to the scoping report, and refer to comments made in relation to the earlier pre-application enquiry (ENQ/2024/0141). This advice stated:

Vehicular Access

In respect vehicular access the maximum gradient of the first 10m of access must not exceed 1 in 20. The centreline of the proposed access should be a minimum of 4.0m from the existing junction centreline.

Parking Standards

The application must includes details of both construction and operational parking arrangements.

Traffic Assessment

A Traffic Assessment will be required in support of this proposal.

Construction Traffic Management Plan (CTMP)

CTMP to be agreed with planning authority and developed with the consultation of the local roads maintenance team.

The CTMP to include:

- The construction of the site access and the creation, positioning and maintenance of associated visibility splays;
- Access gates will be hung to open away from the public Road no less than 10m from the carriageway edge and shall incorporate appropriate visibility displays;

- Proposed accommodation works and where necessary a programme for their subsequent removal and the reinstatement of street furniture and verges, where required, along the route;
- The pre-construction road condition established by a detailed survey for accommodation works within the Roads boundary conducted with a Road Authority representative;
- Details of road improvement, construction specification, strengthening, maintenance and repair commitments, if necessary, as a consequence of the development;
- Details of proposed crossings of the Road verge;
- Retained areas for vehicle parking, manoeuvring, loading and unloading for their specific purpose during the development;
- The surfacing of the access roads from the public Road into the site shall extend for a minimum of 10m;
- Construction vehicle routing including total no of trips and max no of trips/day;
- The dimensions of abnormal loads;
- The management of junctions to and crossings of the public Road and other public rights of way/footway;
- The scheduling and timing of movements, details of escorts for abnormal loads, temporary warning signs and banksman/escort details.

As the proposed routes incorporate unclassified roads, modifications to roads and junctions, and a wear and tear agreement, are likely required. Single track sections will require more and lengthened passing places, where lengthened beyond standard length they should be returned to standard length after construction, likewise for any additional passing places. Minimum spacing of 150m for passing places and to be intervisible.

Modifications to the adopted road will require a section 56 application and a land transfer agreement.

The Developer should contact the local Roads Maintenance Team and Bridges Team at least two months prior to start of works to arrange any necessary permits and surveys to be completed. For the avoidance of doubt where different transportation routes are required for components or construction vehicles these should be identified separately. Abnormal loads may require a separate route from crane or construction traffic.

To avoid delay in the start of development it is advisable to submit the Abnormal Load Routing Plan (if required) at least 3 months prior to commencement of development. This will enable assessment of the route and any problems to be identified. (Contact Abnormal Loads Officer either by email at abnormal.loads@aberdeenshire.gov.uk or bridges@aberdeenshire.gov.uk

*External*

**Historic Environment Scotland** have provided comments in relation their remit (World Heritage Sites, Scheduled Monuments, A-listed Buildings, Inventory Gardens and Designed Landscapes, Inventory Battlefields and Historic Marine Protected Areas.

HES consider the proposal unlikely to impact upon items described within their remit, and as such are satisfied for these to be scoped out of the assessment.

**NatureScot** are satisfied with the proposed scope of assessment.

**Scottish Water** have raised no concerns in respect of the proposed development and have highlighted that the developer should engage with Scottish Water to ensure that the development has no impact upon Scottish Water assets within the vicinity of the Development Site.

**SEPA** has provided detailed comments, and referred to previous pre-application advice (ENQ/2024/0141). The SEPA response has been appended to this letter for ease.

I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees.

This opinion will be held for public inspection for a two year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application.

Should you wish to discuss any matters relating to this issue please contact the above named officer.

Yours faithfully

Paul Macari

Head of Planning and Economy

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

James Hewitt
Planning Department
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By email only to:
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Our Ref: PCS-20002168
Your Ref: ENQ/2024/0903

SEPA Email Contact:
planning.north@sepa.org.uk

10 July 2024

Dear James Hewitt

**Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017**
**ENQ/2024/0903 - EIA Scoping Opinion for Erection of 400kV Substation and Associated Infrastructure**
**Land At Mains Of Greens, Cuminestown, Turriff, Aberdeenshire, AB53 5YQ**

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development.

**Advice for the planning authority / determining authority**

We provide generic advice for large scale projects such as this in the attached appendix and relevant standing advice can also be found at sepa-triage-framework-and-standing-advice.pdf. The developer should however specifically note the site-specific advice scoping and pre-application provided below.

## 1. Site specific comments

1.1 SEPA provided pre-application advice to Aberdeenshire Council on 23 April 2024 on



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this proposal and these comments still stand.

Watercourse crossings

1.2 As highlighted in previous SEPA responses direct to the applicant, our preference would be, in accordance with NPF4 mitigation hierarchy, to minimize watercourse crossings and for the proposed access road to make use of the existing minor road to the south of the site with an upgrade of this and the associated existing crossing of Burn of Greens. This would not only cause significantly less environmental impact in terms of soils, flood risk and water environment but also provide potential betterment to the existing watercourse crossing.

Watercourse diversions

1.3 We regard the central watercourse running through the site as a natural watercourse. The watercourse is shown on the 1870 map and whilst we agree it is heavily modified, there is sufficient evidence that a natural watercourse is likely to have existed here prior to the modification.

1.4 This being the case, we confirm authorisation for any channel realignment of this watercourse will be required under CAR. As this current channel is considered to be very modified there could be an opportunity to create a better-quality morphology through realignment. However, this depends on the constraints imposed by the significant earthworks that will need to be undertaken to form the substation platform. The revised topography created by the earthworks could still prove a challenge as previously highlighted to the applicant. A clear indication of how this will be tackled will be required to be submitted as part of the future application. We will require to see more detailed topographic plans illustrating the changes that will be created by the proposed platform and how the watercourse/realigned watercourse relates to this.

1.5 We note from OS mapping that there is another small watercourse to the northeast. It is very similar to the other watercourse with similar evidence that it was a natural historic watercourse that has been straightened/realigned. Based on the old maps, it is most likely that the channel to the northwest of the wooded area in the northwest corner of the site ends up in this watercourse. Previous submitted documents show this watercourse being diverted to the north of the proposed substation platform but

tightly constrained by a proposed landscape bund.

1.6 There are likely to be similar challenges realigning this watercourse as for the other watercourse and we therefore will require further detailed topographic plans illustrating the changes that will be created by the proposed platform and associated landscaping and how the realigned watercourse relates to these elements in the planning submission. A 10m minimum unrestricted buffer either side of the watercourses will be required to allow for natural movement in future.

1.7 We re-iterate that they are not against a watercourse diversion in principle when it has been demonstrated these have been heavily modified previously. However, it will need to be demonstrated any watercourse diversion is achievable and capable of being authorised under the Water Environment (Controlled Activities) (Scotland) 2011. Well-designed watercourse diversion of previously modified watercourses can help to achieve further project aims such as biodiversity net gain and this we welcome if demonstrated this is appropriate and achievable. We will require detailed design drawings of both proposed water course diversions with proposed cross sections, long sections within a detailed hydromorphological study and a flood risk assessment of each at the planning application stage that demonstrate this.

1.8 Notwithstanding the above, we confirm we agree with the proposed elements to be scoped-in or out of the EIA as detailed in the Scoping Report dated June 2024.

1.9 We welcome the commitment to undertake a flood risk assessment (FRA). As previously highlighted, the proposed access route crosses the Burn of Greens and appears to include associated land raising across the flood extent of the Burn of Greens. NPF4 policy 22 states avoidance should be to be the first principle, and our strong preference would be for this watercourse crossing to be removed and the access road brought south to meet the existing minor road to the south to avoid any development within the Burn of Greens flood extent and minimise other environmental impacts.

1.10 To comply with NPF4 Policy 22, no landraising will be acceptable within the flood extent without suitable compensatory storage. The FRA will need to demonstrate adequate compensatory storage is provided and there is no increase in flood risk

elsewhere. In addition all new watercourse crossing will be required to be designed to be open span or arch culverts and will need to be designed to the 1:200 plus climate change flood levels.

## 2. Regulatory advice for the applicant

2.1 Details of regulatory requirements and good practice advice, for example in relation to engineering works in the water environment and waste management, can be found on the regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: GS@sepa.org.uk.

2.2 We highlight that CAR Authorisation is required for all natural watercourse diversions and culverting for land gain (to which SEPA has a presumption against in most cases) for any watercourse (not just those that appear on the 1:50,000 OS Mapping).

If you have queries relating to this letter, please contact us at planning.north@sepa.org.uk including our reference number in the email subject.

Yours sincerely,

Zoe Griffin
Senior Planning Officer
Planning Service

Ecopy to:
Applicant, chris.gardner@sse.com, Case officer james.hewitt@aberdeenshire.gov.uk

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the

above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our website planning pages - www.sepa.org.uk/environment/land/planning/

## Appendix 1: Detailed scoping requirements

Please note that some of the planning guidance referenced in this response is being reviewed and updated to reflect the National Planning Framework 4 (NPF4) policies. For example the Flood Risk Standing Advice and Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems. It still provides useful and relevant information, but some parts may be updated further in the future.

This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

### 1. Site layout

1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information.

1.2 The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.

1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required.

### 2. Water environment

2.1 The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid

other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.

2.2 The submission must include a set of drawings showing:

a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses;

b) Suitable buffers as detailed above for each watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works;

c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all lochs and watercourses within 250m and showing a site-specific buffer around each loch or watercourse proportionate to the depth of excavations. The information provided needs to demonstrate that a site specific proportionate buffer can be achieved.

2.3 Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.

## 3. Flood risk

3.1 Advice on flood risk is available at Flood Risk Standing Advice and reference should also be made to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.

3.2 Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures.

3.3 If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our Technical Flood Risk Guidance for Stakeholders outlines the information we require

to be submitted in an FRA.

## 4. Peat and peatland

4.1 Where proposals are on peatland or carbon rich soils (CRS), the following should be submitted to address SEPA's requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage). Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not.

4.2 It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.

4.3 The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation required. These plans should be overlaid on the following:

a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the Peatland Survey – Guidance on Developments on Peatland (2017);

b) Peat depth survey showing interpolated peat depths;

c) Peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

4.4 The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed

excavation is on peat less than 1m deep.

4.5 The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided and the volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks.

4.6 The Outline Peat Management Plan (PMP) must include:

a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes;

b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed);

c) Details of proposals for temporary storage and handling of peat - Good Practice during Wind Farm Construction outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss;

d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use. If peat is to be used in borrow pits on site, SEPA will require sections and plans including the phasing, profiles, depths and types of material to be used;

e) Use of excavated peat in areas not disturbed by the development itself is now not a matter SEPA provides planning advice on. Please refer to Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot 2023, and the Peatland ACTION – Technical Compendium which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that SEPA can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste.

## 5. GWDTE and existing groundwater abstractions

5.1 Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas.

5.2 A National Vegetation Classification (NVC) survey should be submitted which includes the following information:

a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.

b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to Guidance

on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.

5.3 Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.

## 6. Forest removal and forest waste

6.1 If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.

6.2 The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.

## 7. Pollution prevention and environmental management

7.1 The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the Guidance for Pollution Prevention (GPPs) and our water run-off from construction sites webpage for more information.