



South Kyle II Wind Farm

FEI Technical Appendix D: Peat Management Plan

Vattenfall Wind Power Ltd

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1. Introduction

This Peat Management Plan (PMP) provides information and guidance on the environmentally compliant re-use and management of excavated peat at South Kyle II Wind Farm.

This document is a technical appendix to Chapter 8: Hydrology, Geology and Hydrogeology of the Environmental Impact Assessment Report (EIAR)¹ and the Further Environmental Information (FEI) Report and should also be read in conjunction with the South Kyle II Wind Farm: Peat Slide Risk Assessment (PSRA)². This document has also been updated to reflect the latest design layout (referred to as the Amended Proposed Development) presented within the Further Environmental Information (FEI) report³ submitted in March 2026 (see Section 1.1 for details relating to the reporting narrative).

The information presented in this PMP should be used to inform the wider assessments carried out for the Proposed Development. The study has drawn on information collected as part of a peat study, including desk-based study followed by a phase one and phase two depth surveying exercise. The PMP estimates the total volumes of excavated peat likely to be produced by the Proposed Development and outlines the suitable reusable methods in line with the regulatory requirements and industry good practice methods.

This strategy should be adopted to allow peat to be managed in a sustainable manner, minimising excavation via the adoption of appropriate construction methods. Targeted and appropriate re-use of peat as part of the reinstatement works shall also be a primary construction.

1.1. Report Narrative

1.1.1. April 2025 (Revision C)

Revision C of the PMP was submitted as part of the EIAR as an appendix to Chapter 8: Hydrology, Geology and Hydrogeology¹. The Proposed Development consisted of the following:

- Up to 11 wind turbines
 - Turbine foundations
 - External transformer housing
 - Crane pads
- Substation, control building and compound
- Battery/energy storage infrastructure
- Upgraded and new access tracks
- Underground cables
- Grid Route
- Temporary use of existing borrow pits
- Temporary batching plant area(s); and
- Temporary construction and storage compounds, laydown areas and ancillary infrastructure

¹ Natural Power (2025) South Kyle II Wind Farm Environmental Impact Assessment Report – Chapter 8: Hydrology, Geology and Hydrogeology. ECU Reference: EC00003429.

² Natural Power (2026) South Kyle II Wind Farm – Peat Slide Risk Assessment. Document Reference: 1365043/C

³ Natural Power (2026) South Kyle II Wind Farm – Further Environmental Information Report. Document Reference: 1411302.

1.1.2. February 2026 (Revision D)

The PMP was submitted as part of the FEI³ to reflect both the Amended Proposed Development and to address the comments made by SEPA following review of the Revision C of the PMP. SEPA consultation comments in relation to the PMP are as follows:

- *In general, it appears that impacts on peat have not been minimised, and as such we are of the view that the mitigation hierarchy of NPF4 Policy 5 has not been met. As the development currently stands there is a surplus of some 5,000m³ of peat which may require to be taken off site (or require a waste management licence).*
- *Fig 8.4 Interpolated peat depths. The layout doesn't seem to have avoided some deeper pockets of peat, especially around T3 and the access track to and from. Also, T1 and the associated track there. Section 3.3 of the PMP states that an iterative design has been used to minimise peat excavation. T3 and to a lesser extent T1 does not accord with this statement. Based on the information that is available, we consider it unlikely that the location of T3 will be considered acceptable in terms of peat impacts, and we request that consideration is given to removing this turbine as well as refining the layout more generally to avoid the deeper pockets of peat.*
- *Floating tracks - Section 3.3 of the PMP also details the use of floating roads but no further details are provided in this section or anywhere else in the document. We require more details and a map to demonstrate the use of floating roads for all new tracks crossing peat >0.5m along with further mitigations to be implemented. While pre-existing roads are being utilised in part, many of the tracks will be new and cross areas of deeper peat. Section 3.2 of PMP does not list floating roads as a construction activity.*
- *The proposed temporary construction compound – section 4.2 (of PMP) states that this is an existing area of hardstanding remaining from the South Kyle I Wind Farm but will be expanded. This looks to be entering areas of very deep peat and impinges on an area with some of the deepest peat across the whole site, in excess of 3m. We would request that the size of this be re-assessed, or it be relocated off deeper peat. Ideally if relocated this would also be taken outwith the 50m buffer zone of the nearby watercourse.*
- *Borrow pit – Some clarity around this is required. It is currently proposed to use an existing borrow pit/quarry area. Table 3.1 Proposal for re-use lists borrow pit as being the existing quarry that will remain open beyond construction and will not be reinstated with peat. However, under amorphous peat in section 3.4.3 it states -The peat may also be used in the restoration of the borrow pit beneath an acrotelmic layer to create conditions which will support development of a mire habitat. Section 4.4 also mentions borrow pit restoration in the context of finding alternative ways to utilise the excess excavated peat. Section 5.4 At the borrow pits, peat will be stripped and temporarily stored as close as possible.*
- *PMP Table 3.1 references verges approx. 6m wide which appears excessive. The planned track width will be 8.5m wide (section 4.2 PMP). Justification for this verge width must be provided. Any peat re-use needs to provide an ecological benefit and also be able to ensure that the peat continues to function as peat. Verges must not be used to dispose of excess peat.*

This revision has addressed the comments from SEPA and has been updated, as well as addressing the following design changes (Amended Proposed Development layout):

- Turbines T01, T03, and T06 movements;
- Associated track layout amendments;
- Rotation of the temporary construction compound;
- Updated approach to peat management; and
- Details of forest to bog restoration approach.

1.2. Regulatory Requirements

This document addresses the following requirements in line with the Scottish Environment Protection Agency (SEPA) Regulatory Position Statement – Developments on Peatland (2017):

- Prevention – The best management option for waste peat is to prevent its production; and
- Re-use – Developers should attempt to re-use as much of the peat produced on site as possible.

In general, the following guidance has fed into the design assumptions and subsequent selection of appropriate construction methods based on the distribution of peat depths across the site:

- Developments on Peatland: Guidance on the assessment of peat volumes, re-use of excavated peat and the minimisation of waste (A joint publication by Scottish Renewables, NatureScot, SEPA, Forestry Commission Scotland, 2012);
- Guidance on Developments on Peatland – Peatland Survey 2017. Scottish Government, NatureScot, SEPA;
- Floating Roads on Peat (Forestry Civil Engineering & SNH, 2010);
- Good Practice During Wind Farm Construction (A joint publication by Scottish Renewables, NatureScot, SEPA, Forestry Commission Scotland, 2019), Version 4; and
- Guidance on Design Principles for Renewable Energy Development on Peatland on the National Forests and Land (Forestry and Land Scotland, 2024), Version 1.

The document also considers the National Planning Framework 4 (NPF4), published in February 2023, and the approach to soils in Policy 5 detailed below:

a) Development proposals will only be supported if they are designed and constructed:

i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and

ii. In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.

b) Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, as identified by the LDP, will only be supported where it is for:

i. Essential infrastructure and there is a specific locational need and no other suitable site;

ii. Small-scale development directly linked to a rural business, farm or croft or for essential workers for the rural business to be able to live onsite;

iii. The development of production and processing facilities associated with the land produce where no other local site is suitable;

iv. The generation of energy from renewable sources or the extraction of minerals and there is secure provision for restoration; and In all of the above exceptions, the layout and design of the proposal minimises the amount of protected land that is required.

c) Development proposals on peatland, carbon rich soils and priority peatland habitat will only be supported for:

i. Essential infrastructure and there is a specific locational need and no other suitable site;

ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;

iii. Small-scale development directly linked to a rural business, farm or croft;

iv. Supporting a fragile community in a rural or island area; or

v. *Restoration of peatland habitats.*

d) *Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify:*

i. *the baseline depth, habitat condition, quality and stability of carbon rich soils;*

ii. *the likely effects of the development on peatland, including on soil disturbance; and*

iii. *the likely net effects of the development on climate emissions and loss of carbon.*

1.3. Scope & Purpose

This PMP provides a strategy to allow peat to be managed in a sustainable manner, minimising excavation via the adoption of appropriate construction methods as well as detailing targeted and appropriate re-use of peat as part of the reinstatement works. Central to this strategy is both minimising impacts on peatlands through avoidance and design, as well as striving to ensure the peatland system is capable of carbon sequestration.

This PMP addresses the regulatory principles set out in Section 1.2 by establishing the following objectives:

- Providing information on the geology and pedological setting of the Proposed Development Area using published data including previous assessment documents;
- Information on the peat conditions based the additional field surveys and ground investigations undertaken at the Amended Proposed Development and assess its suitability for re-use;
- Information on the measures taken to avoid peat;
- Information on the elements of the Amended Proposed Development that are likely to require peat extraction;
- An estimation of the peat volumes likely to be extracted at each element of the Amended Proposed Development;
- An estimate of the peat volumes that are anticipated to be suitable for re-use in reinstatements and landscape tie-ins; and
- Information on control measures and appropriate management of the peat during handling and storage.

1.4. Peat Definition

Peat is an organic material formed by the accumulation of plant matter at various stages of decomposition, formed over potentially many thousands of years. The characteristics of peat vary widely depending on factors such as the nature of plant material that peat is derived from, the degree of decomposition, the type of peat bog and the quality of water sustaining the bog. In Scotland, the Scottish Government defines peat and deep peat as follows⁴:

- **Organo-soils (or peaty soils):** soils with an organic horizon <0.5 m thick;
- **Peat:** soils with an organic horizon greater than 0.5 m in thickness and an organic matter content exceeding 60%; and
- **Deep peat:** a peat as defined above, with a depth greater than 1.0 m.

There are two distinct types of peat, termed acrotelmic and catotelmic peat. The interface between the two layers is controlled by the position of the water table. The upper layer of peat, the acrotelm, is typically fibrous and comprises the living and partially decomposed peat forming plant matter (vegetation). The thickness of the acrotelm is typically controlled by seasonal variations in the water table that creates cycles of aerobic and anaerobic conditions. The catotelm is situated below the minimum average depth of the water table resulting in permanent anaerobic decomposition of the plant matter and the formation of less fibrous, sometimes amorphous peat.

⁴ Scottish Government (2017) Carbon rich soil, peat and peatland. [180319_definitions-of-carbon-rich-soil_agreed-text-for-website.pdf](#) [accessed 16/05/2024]

A key aim of the PMP is to encourage the functionality of the peatland system following reinstatement. Peat should only be re-used to create a suitable tie-in with surrounding vegetation and to reinstate adjacent ground which has been disturbed during construction. Peat must retain hydrological connectivity to remain functional.

2. Peat Condition

2.1. Site Description

The landscape within the Proposed Development Area is dominated by commercial forestry which is actively managed by Forestry and Land Scotland (FLS). The commercial forestry consists of various stages of growth with areas of fell, mature trees, and more recent planting works. The Proposed Development is also situated adjacent to the operational South Kyle Wind Farm.

The topography of the Proposed Development Area is variable as it consists of hills and upland watercourses that form valleys. The Amended Proposed Development features three main catchments: The River Nith, the River Dee, and the River Doon with multiple tributaries draining in these rivers.

Photographs illustrating the current conditions and land-use at the Proposed Development Area are presented below in Figure 2.1.

Source: Natural Power



Figure 2.1: Photographs show the varying stages of commercial forestry across the Proposed Development Area.

2.2. Geology

In Section 8.6 of Chapter 8: Hydrology, Geology and Hydrogeology¹, the details relating to the geology can be found with bedrock geology presented in Table 8.13 and superficial geology presented in Table 8.14.

To summarise, the bedrock geology consists of sedimentary rocks, such as sandstone and siltstone, with igneous formations, both intrusive and extrusive, found across the Proposed Development Area. The superficial geology features peat, till, alluvium, and glaciofluvial deposits.

It should be noted that there are multiple inferred faults across the Proposed Development Area.

2.3. Field Surveys

Peat depth surveys were undertaken to inform the PMP and the PSRA² provided appended to the EIAR¹, with further surveys undertaken to further inform the PMP and PSRA as part of the FEI³. These comprised of 5,851 (no.) peat probes distributed across a phase 1, 100 x 100 m grid, as well as phase 2 (detailed) probing at a higher resolution (10 x 10 m) at infrastructure locations. The proposed new access tracks featured 50 m with 10 m and 20 m offsets.

The field surveys were conducted in August and December 2022 with further peat depth surveys occurring in June, July, and August 2023. Additionally, peat depth surveys were carried out in April, August, and December 2024. In

October 2025, further surveys were undertaken to address the design layout changes for the Amended Proposed Development associated with the FEI report³.

2.4. Peat Depth & Distribution

In Table 2.1, a summary of the peat depths recorded is presented with FEI Figure 3.3.4 depicting the peat depth survey locations and an associated peat depth interpolation.

Table 2.1: Peat Depth Survey

Peat Depth Range	Number of Points in Range	% of Points
≤0.5	2519	43.1
>0.5 to ≤1.0	2108	36.0
>1.0 to ≤2.0	969	16.6
>2.0 to ≤3.0	242	4.1
>3.0	13	0.2
TOTAL	5,851	100%

Source: Natural Power

The information in Table 2.1 and the interpolated peat depth map indicates that over 40% of the survey points within the Proposed Development Area are ≤0.5 m, with over 75% being <1.0 m. The most significant depths of peat within the Proposed Development Area are within the valley between Clawfin Hill, Benbrack, and Meikle Hill. These areas are illustrated visually in the peat depth interpolation figure (FEI Figure 3.3.4: Interpolated Peat Depth of the FEI Report³).

2.5. Peat Characteristics

The PSRA² utilised peat probing and peat core samples and described the peat using the Von Post scale of humification and classified it as between H2 to H9. Peat is present across most of the site, with depth varying greatly, from none where bedrock outcrops or is close to the surface, to circa 4 m in the centre of flat boggy areas. The most significant depths of peat within the Proposed Development Area are found in the broad valley floors southeast of Clawfin Hill (south of T03), south of Meikle Hill (east of T06) and west of Benbrack (west of T04). Erosive features include occasional peat hags. Due to the presence of commercial forestry across most of the Site, it is difficult to identify other erosional or slope stability features.

3. Peat Management

3.1. Peat Management Principles

A hierarchy of peat management approaches is provided in Scottish Renewables and SEPA guidance (see Section 1.2) documents that recommend the following:

- **Prevention** – prevent or minimise peat excavation/disturbance through considered design that avoids or minimises wind farm infrastructure within areas of peat. Where avoidance is not possible, minimise excavation of peat using engineering solutions, such as floating roads.
- **Re-Use/Reinstatement** – re-use extracted peat close to its original location in the reinstatement or restoration of temporary infrastructure, road verges and borrow pits. Peat may also be used where appropriate to improve or restore peatland habitats.

- **Recycle/Recover/Treat** – while the priority should always be to prevent and re-use peat on site there may be situations in which there may still be a surplus of excavated peat. Where demonstrated that it is suitable for use, peat may be blended, dewatered or treated to improve its properties to support re-use on site.
- **Temporary Storage** – store the peat temporarily during construction prior to re-use in on site reinstatement or restoration activities.

The design of the wind farm layout evolved throughout the assessment of the Proposed Development in response to consultations, desk studies, field surveys and technical assessments undertaken by a range of disciplines in support of the EIAR.

Additionally, the PMP has been produced with consideration to FLS guidance (see Section 1.2) that outlines the following **S.M.A.R.T.** approach:

- **Specific**
 - Clearly identify the site, its access routes, constraints, areas to be excluded.
 - Define what is expected of each party to the plan;
- **Measurable**
 - Which areas are to be subject to site works, phasing, numbers of machines, storage areas etc.
 - What will successfully completed site works look like?
- **Achievable**
 - How will sufficient resources be made available in a timely manner?
 - Who will do what?
- **Relevant**
 - To the site for which the plan is being written and for the site's conditions, not mainly copied and pasted from another scheme or an EIA.
- **Time Bound**
 - Sets out clear timeline for site works to start and finish, when monitoring will be conducted and when the plan will be reviewed and, if necessary, altered.

Information not available at this stage of the Proposed Development would be considered in an updated and detailed Peat Management Plan post-consent.

3.2. Construction Activities & Effects

The following construction activities will require the stripping of peat and peaty soils down to the underlying substate and formation level of the infrastructure:

- Cut access tracks;
- Wind turbine or substation foundation excavations;
- Crane pads;
- Cable trenches;
- Temporary borrow pit excavation; and
- Removal of overburden to facilitate further borrow pitting.

Other construction activities that have the potential to disturb peat include:

- Trafficking of plant and machinery over areas underlain by peat and peaty soils;
- Laydown of materials (including excavated peat and mineral soils) on peat or peatland vegetation; and

- Reinstatement of peat and peaty soils and/or other revegetation activities to reinstate or tie pre-construction peatland habitats into the Proposed Development.

These activities have the potential to cause a range of effects during construction and operation including the loss of integrity and vegetation, drying, erosion, oxidation, interruption of peatland hydrology as well as loss of function.

3.3. Minimising Peat Excavation

The Proposed Development was designed through an iterative approach informed by field surveys and constraints mapping, with peat being a significant factor. The proposed positioning of turbines and alignment of access tracks has sought to minimise the need for peat excavation in the first instance. In this regard, the Proposed Development has prioritised the use of existing tracks.

3.4. Proposed Re-Use

In line with NPF4 and associated good practice guidance, the primary design aim is to avoid peat and therefore peat excavation. However, due to engineering, logistical, and/or to avoid other environmental constraints, the placement of infrastructure on peat is unavoidable. Therefore, the Proposed Development must minimise the effects of disturbance through design and mitigation, namely reinstatement of peat that allows it to remain part of the peatland system and not for it to degrade and lose function as a means of carbon sequestration.

The principal requirements are outlined below:

- All excavations where required, should be monitored and measures taken to prevent collapse and the destabilising of peat deposits adjacent to excavations;
- A system of daily reporting of excavations will be established during construction and utilised to monitor the geotechnical performance of slopes including peat, sub-soil and bedrock. This would be implemented and undertaken by a suitable, experienced and trained member of the site team;
- Where possible, areas of peat within the footprint of excavation will have the top layer of vegetation stripped off as turf prior to construction. When excavating areas of peat (acrotelmic), excavated turves should remain as intact as possible. Peat turves will be stored to promote the retention of structure prior to use in reinstatement;
- Underlying catotelmic peat will then be removed and stored separately and kept damp;
- Excavated peat turves and catotelmic peat will be handled through careful excavation to reduce the risk of cross contamination between distinct horizons and to maximise the potential for reuse;
- In areas of fell forestry brash and stumps may be present within the peat. An outline strategy for handling peat in these areas is discussed separately below in Section 3.4.1;
- Care will be taken when stripping and removing organo-soil and peat turves and appropriate storage methods will be used on site, i.e. excavated material will be stored in separate horizons (acrotelmic and catotelmic) and turves will be placed on top of excavated peat to minimise desiccation and oxidation. They would be placed in a manner to maximise coverage in a “checkerboard” pattern; and
- Classification of excavated materials will depend on their identified re-use in reinstatement works. It is anticipated that the material to be excavated will comprise peat (which may be sub-divided into amorphous peat (catotelmic), fibrous peat (acrotelmic)) and turf.

3.4.1. Forestry & Peat

As a result of previous experience, is likely that the peat turves and excavated material have already been distributed and compromised. In such scenarios, the peat and woody debris is part of a ‘broken system’ and therefore where possible, good practice shall be utilised, although this may not be feasible/achievable in the handling of excavated material across previously forested areas of this site and should be noted at this stage.

The Construction Environmental Management Plan (CEMP) will provide details on the management of forest residues, brash and stumps, however a summary is provided below in the context of peat handling;

- Brash Material;
 - The ground disturbance associated with attempting to remove brash could lead to significant damage including exposing peat to increased erosion and desiccation. Forest Research⁵ publication Guidance on site selection for brash removal states that brash removal on peaty sites can lead to increased turbidity and siltation of watercourses. Brash also provides both physical soil protection and a nutrient source for the forestry following rotation. Accordingly in areas which are to be replanted, the brash will be retained in situ as a nutrient source following standard forest management practice.
 - Within the construction footprint brash will be removed utilising a standard timber forwarder, this brash will be transported to outwith the footprint of the Proposed Development Area where it will be utilised within the future replanting area to reinforce brash matt extraction routes, or if sufficient brash is already in situ in this location, the excess brash from the construction footprint will be comminuted (broken down) on site and dispatched to enter the biomass supply chain.
- Stumps;
 - At this stage it is assumed that stumps will be left in situ as per the guidance contained in the Forestry Commission Research⁶ except where they will be removed for infrastructure footprints. Where stumps are removed during construction activities, they will be comminuted onsite and the resulting biomass material will enter the biomass supply chain.

3.4.2. Peat Re-Use Assumptions

Table 3.1 presents how peat would be successfully re-used / reinstated at the Proposed Development and provides assumptions for the Peat Mass Balance in Section 4.

Table 3.1: Proposal for Peat Re-use / Reinstatement

Infrastructure Component	Proposed Strategy for Re-Use/Reinstatement
Turbines	<ul style="list-style-type: none"> • Turbine foundations would be overlain by a suitable ballast material. • Acrotelmic peat and turves (where present) would be re-used on the surrounding batter slopes (width ~4 m) to ensure suitable tie-in with the surrounding vegetation and habitat. • Catotelmic peat will be used where it will be connected to the water table (lower sections of the slope) and would still require to be covered with acrotelmic peat / turves.
Crane pads	<ul style="list-style-type: none"> • In accordance with good practice guidance (see Section 1.1) the crane pads would not be reinstated but retained to allow for future turbine maintenance. • The crane pad batter slopes shall be reinstated with peat on sides not adjoining the access track or turbine (width ~4 m). Catotelmic peat would be used in lower slope sections, where it is more likely to be connected to the water table. The slope angle would be suitably low (1 in 4 to 1 in 6) to reduce run-off rate and encourage infiltration.
Blade laydown areas & temporary areas	<ul style="list-style-type: none"> • It is assumed that blade laydown areas or other temporary areas adjacent to the crane pad are temporary and would be completely reinstated after construction.

⁵ Forest Research. 2009. Guidance on site selection for brash removal.

⁶ Forest Research. 2011. Environmental effects of stump and root harvesting.

Infrastructure Component	Proposed Strategy for Re-Use/Reinstatement
	<ul style="list-style-type: none"> • Temporary areas would be reinstated by removing the previously placed engineering fill and then placing catotelmic peat from temporary peat stores to a thickness similar to the pre-existing depth (as determined by pre-construction peat depth data) that also ties into the local topography without creating topographic highs. • The low infiltration capacity of the underlying subsoil and bedrock and careful placement of catotelmic peat on flattened areas adjacent to the permeant crane pads should ensure the successful reinstatement of catotelmic peat in these areas. Where the creation of an edge is unavoidable, these should be sealed with turves to retain moisture within the reinstated peat.
New cut access tracks	<ul style="list-style-type: none"> • The verges of new cut access tracks will be reinstated to ensure visible tie-in with surrounding vegetation and habitat but also to ensure stability and functionality of the re-used peat. • The reinstatement area will be ~4 m wide along either side of the track and ~1 m high. • The use of catotelmic peat will only be where it will be in contact with the water table (lower sections of the slope) and would still require to be covered with acrotelmic peat / turves.
Substation & Battery Storage Area	<ul style="list-style-type: none"> • The Substation and Battery Storage Area verges shall be reinstated with peat on sides not adjoining the access track. • Acrotelmic peat or turves may be used to dress cut slopes (if present) to minimise dewatering of effects in upgradient areas.
Borrow Pit	<ul style="list-style-type: none"> • Current borrow pit area is the existing quarry that will remain open beyond construction and will not be reinstated with peat.
Cable trenches	<ul style="list-style-type: none"> • All peat excavated for cable trenches would be reinstated in the excavation after cable installation has been completed. • Catotelmic peat reinstated in cable trenches would be beneath the water table and would be covered with acrotelmic peat.
Temporary construction compounds	<ul style="list-style-type: none"> • The temporary construction compound would be reinstated with peat following completion of construction. • Due to the longevity of this temporary infrastructure element, it is likely that peat excavated from the footprint (if required) would be re-used elsewhere to enable more rapid reinstatement.

It should be noted that final reinstatement dimensions may vary due to the local topography.

Where peat depths are <0.5 m in thickness at specific infrastructure locations, a minimum of 0.5 m of peat shall be used for reinstatement and will strive to safeguard the functionality of the peat.

3.4.3. Suitability for Re-Use

The characteristics of the excavated peat (e.g. fibrosity and water content) determines its suitability for re-use with the wettest most amorphous peat generally being the least suitable. The peat encountered on site is variable with Von Post classifications between H2 and H9, generally becoming increasingly decomposed within the deeper peat deposits.

For the purpose of this PMP, it has been assumed that the top 0.5 m will be acrotelmic peat consisting of fibrous peat and the surface vegetation. The following assumptions have been made with regard of the characteristics of the peat and the intended suitable reuses at the Amended Proposed Development.

- **Actrotelmic peat / peat soils** – when stripped with the vegetation, intact turves of acrotelmic peat or peaty soils will be suitable for surface reinstatement, dressing back and tying in infrastructure to the surrounding vegetation and habitats.
- **Fibrous catotelmic peat** – most suitable for reinstatement beneath the replaced acrotelm. It may also be used as a surface layer with careful site selection and management to control erosion and encourage vegetation recovery (e.g. seeding, translocation of vegetation and fencing to deter deer grazing).
- **Amorphous peat** – peat of this type will only be suitable for reinstatement of excavations beneath a surface vegetation layer. The volume of amorphous peat that will require removal is anticipated to be small given that infrastructure has avoided deep peat where possible.

Where peat stripped at infrastructure footprints contains significant volumes of residual forest materials, such as brash or stumps, efforts will be made to minimise mixing and consequential damage to the peat. However, it is acknowledged this may not be possible in every instance and the presence of residual forest materials may reduce the peat's suitability for reinstatement. Nonetheless, handling of peat containing residual forest materials will follow good practice and will aim to be reused in a way to maximise its reinstatement potential.

4. Peat Mass Balance

4.1. Introduction

The estimate of excavated peat volume has been completed following a desk-based appraisal of the Amended Proposed Development layout supplemented by digital terrain analysis. There has been further refined spatial analysis of the peat depth data set using GIS software.

Information on infrastructure footprints were defined by the Applicant and are presented accompanying the assessment information.

Depths recorded to be greater than 0.5 m are considered to be peat, with the upper 0.5 m being acrotelmic peat and depths beyond 0.5 m considered to be catotelmic peat.

It should be noted that this assessment has not accounted for excavation volumes of glacial sub-soils or weak bedrock material which may be deemed unsuitable for incorporation into foundations and hardstand elements.

Where factors which contribute to the bulking of the peat deposit are mitigated, the total volumes of excavated peat may be reduced through:

- Reduction of peat handling with re-use of peat undertaken as close as possible to the excavation site; and
- Maintaining the integrity of the excavated peat deposits through timely re-vegetation and preservation of the surface hydrology systems.

4.2. Estimation of Excavated Peat Volumes

The activities which would generate volumes of peat are as follows:

- Formation of cut track which would involve the removal and temporary storage of turves, as appropriate, followed by excavation down to formation level. The running width of the track is 8.5 m. The excavation footprint includes drainage and the need for batters;

- Construction of the turbine foundation and crane hardstandings, which would require the excavation of peat and subsoil to expose underlying bedrock or other suitable founding stratum, and in some cases excavation of rock to form a suitable level platform for construction. The depth of the excavation in superficial soils would be dependent on the ground conditions and depth to bedrock, but it has been assumed that the full depth of peat would be excavated from the full development area of each turbine, hardstanding, and associated excavation footprint modelled by the project civil engineer. The modelled extent for crane pad and turbine excavations footprints is ~8,530 m². Of the ~8,530 m², there will be ~2,900 m² of permanent infrastructure whilst the rest of the construction area being temporary and thus fully reinstated at the end of construction. Therefore, only ~2,900 m² is considered within the excavation calculations;
- Excavation of trenches for underground cabling between the turbines and the substation, which would be up to 3 m wide and approximately 1.2 m deep. These would be carefully reinstated with the stored peat once the cables have been laid. No peat excavation volumes for cable trenches are presented as it is assumed that all excavated peat will be re-used during cable reinstatement;
- Construction of the battery storage area and the substation, located near the existing New Cumnock electricity substation, feature a combined footprint of ~18,000 m². These infrastructure elements are permanent; and
- The temporary construction compound is proposed on an existing hardstanding area associated with the South Kyle I Wind Farm, however this will be expanded so the entire footprint will be considered in the calculations (~15,000 m²). However, this will only be used during the duration of the construction and will be fully reinstated once construction is complete and has been discounted from the calculations as it is not permanent infrastructure.

4.3. Peat Excavation

The following sequence of tables (Table 4.1 to 4.3) provide a summary of the indicative peat extraction volume calculation for each infrastructure element. Table 4.4 provides a summary of total peat extractions from the Amended Proposed Development.

Table 4.1: Wind Turbine Foundations & Crane Hardstands (Excavation Area = ~2,900 m²)

Wind Turbine No.	Mean Peat Depth (m)	Peat Excavation Volume (m ³)		Total Peat Excavation Volume (m ³)
		Acrotelmic Peat	Catotelmic Peat	
T1	0.51	1,450	29	1,479
T2	0.50	0	0	0
T3	0.73	1,450	667	2,117
T4	0.47	0	0	0
T5	0.69	1,450	551	2,001
T6	0.48	0	0	0
T7	0.84	1,450	986	2,436
T8	0.84	1,450	986	2,436
T9	0.64	1,450	406	1,856
T10	0.67	1,450	493	1,943
T11	0.51	1,450	29	1,479
Total		11,600	4,147	15,747

Source: Natural Power (2026)

Table 4.2: Cut Access Tracks (Excavation Width For Cut Tracks = 8.5 m)

ID	Track Segment Description	Mean Peat Depth (m)	Peat Excavation Volume (m ³)		Total Peat Excavation Volume (m ³)
			Acrotelmic Peat	Catotelmic Peat	
1	Existing to T1	0.98	531	510	1,041
2	Existing to T2	0.99	1,148	1,125	2,273
3	Existing to T3	0.87	383	283	666
4	T6 to Junction	0.83	170	112	282
5	Existing to T11	0.56	1,148	138	1,286
6	T11 to T4	0.47	0	0	0
7	T7 to T8 to existing SK1 track	0.67	6,503	2,211	8,714
8	T9 track to existing	0.56	2,210	265	2,475
9	T10 track to existing	0.73	2,380	1,095	3,475
10	T5 to Junction (including connecting existing tracks adjacent to T6)	0.53	3,443	207	3,650
Total			17,916	5,946	23,862

Source: Natural Power (2026)

Table 4.3: Ancillary Infrastructure & Borrow Pit

Infrastructure	Construction Footprint (m ²)	Mean Peat Depth (m)	Peat Excavation Volume (m ³)		Total Peat Excavation Volume (m ³)
			Acrotelmic Peat	Catotelmic Peat	
Borrow Pit	75,940	0.00	0	0	0
Substation & Battery Storage Area	18,000	0.47	0	0	0
Total			0	0	0

* There will be no peat excavation for the substation, as ground disturbance remains below the 0.5 m threshold. Consequently, no peat will be excavated.

Source: Natural Power (2026)

Table 4.4: Summary of Likely Peat Extraction

Construction Element	Peat Extraction Volume (m ³)		Total Peat Extraction Volume (m ³)
	Acrotelmic Peat	Catotelmic Peat	
Wind Turbine Foundations & Crane Hardstands	11,600	4,147	15,747
Access Tracks	17,916	5,946	23,862
Ancillary Infrastructure	0	0	0
Total Peat Excavation (m³)	29,516	10,093	39,609

Source: Natural Power (2026)

4.4. Peat Re-Use Volumes

Peat re-use volume calculations have been completed exercising the reinstatement criteria presented in Table 3.1. Table 4.5 summarises the potential reinstatement and re-use volumes for acrotelmic and catotelmic peat at the Proposed Development.

Table 4.5: Summary of Likely Peat Reinstatement

Construction Element	Peat Re-Use Volume (m ³)		Total Peat Re-Use Volume (m ³)
	Acrotelmic Peat	Catotelmic Peat	
Wind Turbine Foundations & Crane Hardstands	2,369	237	2,606
Access Tracks	18,580	1,858	20,438
Ancillary Infrastructure	360	180	540
Total Peat Re-Use (m³)	21,309	2,275	23,584

Source: Natural Power (2026)

Table 4.6: Estimate of Peat Balance Through Reinstatement (Excavation Versus Re-Use Volumes)

Construction Element	Peat Excavation Volume (m ³)	Potential Peat Re-Use Volume (m ³)	Surplus (+) or Capacity (-) (m ³)
Wind Turbine Foundations & Crane Hardstands	15,747	2,606	13,141
Access Tracks	23,862	20,438	3,424
Ancillary Infrastructure	0	540	-540
Total	39,609	23,584	16,025

Source: Natural Power (2026)

Comparing the total capacity for peat re-use with total volume of excavated peat, it is indicated that the Amended Proposed Development will not have sufficient capacity to accommodate all excavated peat on site through reinstatement only.

4.5. Peatland Restoration Volumes

During post-consent, there are several opportunities to reduce this excess of peat, including layout optimization by relocating infrastructure out of peat-rich areas, micrositing within the 50-meter allowance into shallower peat zones, and further peat data collection to aid in infrastructure placement. Additionally, geotechnical investigations can suggest alternative engineering solutions such as low volume excavation for crane pads and further track sections.

However, as identified in Table 4.6, there is **16,025 m³** of surplus peat that cannot be accommodated through reinstatement across the Amended Proposed Development. However, there is a potential for this excess peat to be utilised in restoration.

As detailed within Chapter 12: Forestry Assessment of the EIAR⁷, the Proposed Development will require keyhole felling and is presented within EIAR Figure 12.6: Proposed Development Construction Felling in Volume 2a. It is proposed that these keyhole felling areas could undergo forest to bog restoration that would involve infilling depressions and ground smoothing over the felled forestry areas, utilising the excavated peat surplus. By ground smoothing the felled forestry areas, the ridges and furrows that are actively draining the areas would be removed and a topography similar to near natural peatland would be replicated. This aids in the re-wetting of the felled forestry areas and thus raising the water table. Further details on the approach can be found in Section 6.

It has been estimated that 18.34 ha has potential to be restored using the techniques discussed above. By assuming that restoration depth 0.5 m would be used, this would result in a potential **91,700 m³** of peat capacity. Therefore, the estimated peat balance is shown below:

⁷ Natural Power (2026) South Kyle II Wind Farm Environmental Impact Assessment Report – Chapter 12: Forestry Assessment. ECU Reference: EC00003429.

Table 4.7: Estimate of Peat Balance Through Reinstatement and Restoration

Construction Element	Peat Excavation Volume (m ³)	Potential Peat Re-Use Volume (m ³)	Surplus (+) or Capacity (-) (m ³)
Wind Turbine Foundations & Crane Hardstands	15,747	2,606	13,141
Access Tracks	23,862	20,438	3,424
Ancillary Infrastructure	0	540	-540
Peatland Restoration	0	91,700	-91,700
Total	39,609	115,284	-75,675

Source: Natural Power (2026)

Comparing the total capacity for peat re-use with total volume of excavated peat, it is indicated that the Proposed Development will have sufficient capacity to accommodate all excavated peat on site through a combination of restoration and reinstatement. On the basis of the peat balance calculations provided, measures for the recycling, other recovery and disposal of waste peat are therefore not required.

It should be recognised that this PMP provides an outline of the potential re-use opportunities and peat mass balance for the Amended Proposed Development. It should therefore be updated after the detailed design / Balance of Plant (BoP) tender stage once the final infrastructure locations are known, and a contractor has been appointed. The final PMP should be updated in accordance with Stage 3 of the development process and should form the basis against which the site will be monitored by the ECoW and BoP Construction Manager.

5. Good Practice Control Measures

5.1. Introduction

The purpose of this section of the PMP is to detail how the management of peat will be controlled and to specify how peat will be protected and peat integrity conserved throughout all stages of the construction works.

Where possible during detailed design the excavated peat volumes will be minimised by micro-siting wind farm infrastructure to avoid areas of deeper peat.

Where peat excavation is unavoidable care must be taken when handling, transporting and stockpiling peat to protect the peat structure and strength as far as possible.

Where possible the movement of peat over long distances will be minimised and peat will be stored locally for re-use as soon as possible. Furthermore, double handling will be avoided as much as possible and a robust planning and monitoring programme will be developed to ensure that peat and mineral soils are not mixed.

5.2. Minimising Unnecessary Disturbance

The acrotelmic layer of the peat contains the living matter what protects the underlying catotelmic peat from drying and erosion. Therefore, it is important that measures are taken to avoid ripping up or rutting of the surface peat. In addition, unnecessary trafficking and appropriate scale plant will be used, such as 360° diggers rather than bulldozers to minimise any unnecessary compaction.

An access plan following the consented access track routes will be developed and physically demarcated. The plan and demarcated route will provide a designated controlled route and a permissible corridor within which service vehicles and plant can operate prior to peat and topsoil stripping. The purpose of this is to protect in-situ peat in

areas that will not be affected by the Amended Proposed Development layout and prevent unnecessary damage. The plan will also consider other constraints identified in the EIAR.

Access routes and working areas will be clearly delimited throughout the construction phase to ensure that peat compaction and damage in areas not directly involved in the works will be avoided. The construction works will be phased to ensure that peat is stripped in each part of the Amended Proposed Development site ahead of the mineral substrate.

5.3. Excavation Methods

Peat excavation and handling will be in accordance with industry best practice. Excavated peat should be excavated as turves, including the acrotelm (surface vegetation) and a layer of adjoining catotelm (more humified peat), typically up to 500 mm thick in total, or as blocks of catotelm; the acrotelm should not be separated from its underlying peat.

Wherever possible, a 360° excavator will be used to strip the widest peat turves possible, with their vegetation intact. Ideally the turves should be a minimum of 0.5 m thickness and with an area up to a maximum of ~1m². However, the depth and scale will depend on the depth, consistency and condition of the peat at each location and the plant used for stripping.

The turves should be as large as possible to minimise desiccation during storage. Contamination of excavated peat with substrate materials should be avoided. Consideration should also be given to the timing of excavation activities to avoid very wet weather and multiple handling to minimise the likelihood of excavated peat losing structural integrity. If possible, extraction should be of intact, full depth, acrotelm layers from the top surface of the peat deposit. This technique will maintain connectivity between the surface vegetation and the partially decomposed upper layers of the catotelm.

For the laying of electrical cables, it is anticipated that the cable trench will be excavated by stripping surface peat and laying the turves separately to catotelmic peat temporarily on a geotextile mat to protect the underlying vegetation. Where required, the mineral soils should be segregated from the peat and also placed on a barrier material prior to reinstatement.

5.4. Temporary Storage & Stockpiles

Consideration for the storage of peat has been undertaken with input gathered from the Scottish Renewables Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste.

The temporary storage of peat for long durations should be avoided where possible to minimise drying, weathering and erosion of the peat. Where possible the peat should be transported from the point of extraction to its re-use or reinstatement location. However, there are likely to be instances during construction where the peat will need to be temporarily stored prior to re-use or reinstatement (e.g. near the turbine for later reinstatement of the turbine base).

Stored peat would also be covered with turves in a manner to maximise coverage. In general, it shall be a priority to avoid a single site temporary peat storage area. A progressive construction method which re-cycles peat through excavation and timely re-instatement shall be adopted. However, some elements may require storage of peat prior to re-instatement at the end of the construction phase.

The peat will be temporarily stored in the following general arrangement:

- Peat stripped to construct new cut access tracks will be re-used as the construction progresses. The intact surface turves (where present) will be placed on roadside verges during construction and will not need to be stored elsewhere;
- At turbines, crane pads, laydown areas and the construction compound peat will be temporarily stored in designated locations as close to the original location as possible;

- At the borrow pits, peat will be stripped and temporarily stored as close as possible;

Determining factors are associated with the peat stability, sensitive receptors, drainage and pollution prevention. Areas of deeper peat (>1.0m) and sensitive areas including Groundwater Dependent Ecosystems (GWDTE) shall be avoided for dedicated temporary storage areas.

It will be a priority to ensure that a future detailed site investigation provides information on the suitability of these temporary peat storage areas including the topographic profile, groundwater regime, and geotechnical properties of deposits underlying the temporary storage sites. Furthermore, it may be necessary to undertake further peat stability calculations based on finalised placement of temporary peat storage areas.

Should any problems be observed during regular visual inspections of peat stockpiles, this would invoke implementation of an appropriate corrective action.

Owing to the geographical position of the site with consequentially high rainfall, it is anticipated that watering the stored peat through natural precipitation will be sufficient for the peat to remain damp, thus preventing drying out and desiccation and allowing the vegetation layer and seed bank to be sustained. This is an important element in the restoration of the landscape, providing continuity with surrounding local vegetation upon reinstatement. For the duration of the temporary storage, it shall be necessary to periodically monitor the condition of the stored peat and ensure the stability is maintained should be undertaken by a suitably qualified geotechnical engineer. During prolonged dry spells artificial wetting could be undertaken, however, this will be done under the agreement and supervision of the ECoW and Principal Contractor with appropriate mitigation in place to ensure the protection of the stored peat, as well as any nearby receptors such as watercourses or GWDTE.

6. Forest to Bog Restoration

Prior to restoration, further assessment and surveys should be undertaken to ensure that the proposed areas are suitable post-felling and provide updated volumes of excavated peat that should be used. It is expected that further survey and assessment would be undertaken to assess both the wider ecological characteristics as well as the peat stability. Any areas determined to be suitable for restoration should be signed off by a suitably qualified ECoW.

Furthermore, the restoration would involve the following:

- **Infill and Raising of Ground Profiles**
 - Due to the existing forestry activities, there is a significant drainage system that would be targeted with re-profiling and furrow blocking.
 - Peat would be spread and covered with retained vegetated turves, however if turves are limited then a checkerboarding of turves would be used to ensure widespread regeneration of the vegetated layers.
 - Re-seeding may also be considered to stabilise the restored surface peat layers.
- **Peat Bunding**
 - Peat bunds targeted to control surface water flows and promote peatland restoration aims by raising water levels and thus reducing the potential for drying of restored areas.
- **Gulley & Bare Peat Restoration**
 - Placement of suitable peat layers and facilitating revegetation to stabilise degraded peat areas.
- **Use of Felled Material**
 - Brush and material from the felling operations could be spread across the surface to provide shade and shelter that will promote rewetting and recovery of sphagnum.

It should be noted that the restoration taking place within the keyhole felling, there will be access provided to machinery in order to carry out the restoration works. This is typically a significant challenge in restoration as access

needs to be constructed in order for the appropriate machinery to reach the proposed restoration areas that may result in further impact. Additionally, neighbouring wind farm developments (such as South Kyle Wind Farm⁸ and North Kyle Wind Farm⁹) have utilised forest to bog restoration techniques, with the IUCN publishing the *Forest to Bog Restoration – Demonstrating Success*¹⁰ highlighting various case studies where restoration has been successful.

Peatland restoration can provide multifaceted benefits to both the wider hydrological and ecological environment. Forest to bog restoration provides natural flood management benefits as water is retained within the peatland as opposed to being drained into watercourses, thus increasing flood risk downstream. For the ecological environment, restoration provides an enhancement to biodiversity through habitat creation (further details can be found within the Outline Biodiversity Enhancement and Restoration Plan¹¹).

7. Monitoring & Inspection

The success of construction and the subsequent re-use of peat across the site will be monitored by the ECoW to ensure that effects on the peatland environment are appropriately understood and subsequently reduced via any remedial works that can be undertaken. The details of any required monitoring would be discussed and agreed with SEPA, NatureScot and the Local Planning Authority prior to commencement. Appropriate monitoring is important to:

- Provide reassurance that established in-place mitigation and reinstatement measures are effective and that the site is not having a significant adverse impact upon the local and/or wider environment;
- Indicate whether further investigation is required and, where pollution is identified or unsuccessful reinstatement, the need for additional mitigation measures to prevent, reduce or remove any impacts on the environment; and
- Understand the long-term effects of the site on the natural environment.

Due to the nature of the construction activities and the possibility that such works can increase the volume of dissolved and particulate matter from entering the natural drainage network a robust hydrological monitoring strategy will be implemented.

A reinstatement monitoring strategy can also be implemented, where surveys can be carried out to monitor the success of peat re-use and subsequent reinstatement. Complimentary to the hydrological monitoring highlighted above and best practise geotechnical monitoring, the success of vegetation reinstatement can provide an insight into the effects of the wind farm on the local environment. Full details of the environmental monitoring strategies will be finalised following consultation with SEPA, NatureScot and the Local Planning Authority.

Additionally, to evaluate the effectiveness of forest to bog restoration, it is proposed that dipwell monitoring is undertaken on restoration areas. This will be able to quantify whether the water table has risen and assess the effectiveness of rewetting within the areas targeted.

⁸ RJ McLeod (2026) Project: South Kyle Wind Farm, Dalmellington. Available at: <https://www.rjmcleod.co.uk/south-kyle-wind-farm-dalmellington> . (Accessed on 13 January 2026)

⁹ Brockwell Energy (2025) North Kyle Wind Farm: A Case Study of Considerate Community-Focused Development. Available at: <https://www.brockwellenergy.com/media/22yblqr3/north-kyle-wind-case-study-of-considerate-development.pdf> . (Accessed on 13 January 2026)

¹⁰ IUCN (2024) Forest to Bog Restoration – Demonstrating Success. Available at: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2024-03/Demonstrating%20Success%20Forest%20to%20Bog_small.pdf . (Accessed on 13 January 2026)

¹¹ Natural Power (2025) South Kyle II Wind Farm – Appendix 6.3: Outline Biodiversity Enhancement and Restoration Plan. Document Reference: 1350336/F

Dipwell monitoring, which acts to measure the water table level, will be carried out in transects at a number of locations surrounding the ditch blocking area using dipwells. The water levels will be manually recorded from the dipwells which are perforated plastic tubing that allows the ingress of groundwater but prohibits the ingress of precipitation through a cap that can be opened and closed. Levels will be monitored manually using a dip meter that sounds when the probe encounters water. The use of the dipwells is an effective way to manually record water levels as it can record the minimum and maximum water levels over a given period. The accuracy of such data depends on the intervals between visits to record the data.

Water level monitoring will be carried out on a monthly basis for a minimum of six months during baseline and on a monthly basis in Year 1 and 2 following restoration. Monitoring will then continue on a 6-monthly basis for Year 3-5, as stipulated in the HMP. This would then be reviewed, and further monitoring would be agreed if required. Frequency and duration would be dependent on the success of the restoration.

8. Disclaimer

The PMP should be considered a live document throughout the planning process and any future pre-construction phases of works. As such, additional information can be incorporated following the results of detailed site investigations carried out prior to construction, as well as from any discussions with SEPA or other engaged stakeholders throughout the development process.

The peat extraction and re-use volumes are intended as a preliminary indication. The total peat volumes are based on a series of assumptions for the infrastructure layout and peat depth data averaged across discrete areas of the Amended Proposed Development. Such parameters can still vary over a small scale and therefore local topographic changes in the bedrock profile may impact the total accuracy of the volume calculation.

The accuracy of these predictions may be improved though further detailed site investigation (post consent). It is therefore important that the PMP remains a live document throughout pre-construction and construction phases and is encapsulated within a wider CEMP. The PMP and volumetric assessments can be updated as more accurate information becomes available.



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