

11. Schedule of Mitigation

11.1 Introduction

- 11.1.1 Best practice in Environmental Impact Assessment (EIA) recommends the use of a Schedule of Mitigation, which can act as a quick reference for anyone interested in the mitigation measures which the Applicant has committed to implementing and upon which the assessment of residual effects presented within the EIA Report has been based. It will be utilised by the Applicant throughout development of the detailed design, the appointed contactors during construction, and the windfarm operators once the Proposed Development is operational. It is proposed that each of the measures in the schedule will be implemented as a minimum at the appropriate point in the Proposed Development's life cycle.
- 11.1.2 **Table 11-1** presents a Schedule of Mitigation for the Proposed Development, listed according to the relevant environmental topic area. Individual EIA Report chapters should be referred to for full details of the commitments.



Table 11-1: Schedule of Commitments

Subject Area	Commitment	Timing
Micrositing	A micrositing allowance of up to 100 m in all directions is being sought in respect of each turbine and its associated infrastructure in order to address any potential difficulties which may arise in the event that pre-construction surveys identify unsuitable ground conditions or environmental constraints that could be avoided by slight relocation.	Construction
Turbines, Turbine Foundations and Crane Hardstandings	Detailed ground investigations will be completed prior to construction. This will inform final foundation and crane hardstanding design.	Pre-Construction
	Detailed construction drawings with final dimensions will be available prior to the commencement of construction once the final turbine model has been selected.	Pre-Construction
	The wind turbines will be of a typical modern, three-blade, horizontal axis design in semi-matt white or light grey with no external advertising or lettering except for statutory notices.	Construction and Operational
Access Tracks	Existing onsite access tracks, where possible, will be retained, re-used and upgraded (where necessary).	Construction
	The Applicant will ensure that the vehicles will be routed as agreed with East Ayrshire Council (EAC), Transport Scotland and Police Scotland, to minimise disruption and disturbance to local residents and road users.	Pre-Construction
Drainage Management Plan (DMP)	A detailed DMP design will be developed and submitted to the Scottish Ministers and EAC, in consultation with Scottish Environment Protection Agency (SEPA), for approval prior to construction.	Pre-Construction
Construction Compounds	Prior to commencing construction work, a detailed appraisal of the area will be undertaken, including the applicable ecological checks and trial pits and /or boreholes to confirm the nature of the sub-strata.	Pre-Construction
	The detailed locations, sizes and engineering properties of the construction compounds will be confirmed prior to the start of construction, after the turbine supplier and model have been confirmed.	Pre-Construction
Substation, Energy Storage & Cabling	Lighting will be kept to a minimum and will be limited to working areas only and will comply with health and safety requirements. Lighting will be down lit and linked to timers and movement sensors so that light spill is kept to a minimum.	Construction and Operational
Construction Hours	Normal construction hours will be between 07:00 and 19:00 Monday to Friday and 07:00 and 13:00 on Saturdays and bank holidays. These times have been chosen to minimise disturbance to local residents. It must, however, be noted that out of necessity due to weather conditions and health and safety requirements, some generally quiet activities, for example AIL deliveries (which are controlled by Police Scotland) and the lifting of the turbine components, may occur outside the specified hours stated. Any construction outwith these hours will be in line with the noise limits as assessed in Chapter 9: Noise and advance warning of any works outwith the agreed working hours will be provided to EAC and local residents.	Construction
	The Contractor will produce and adhere to a CEMP. This shall be developed in detail in consultation with the Scottish Ministers, NatureScot, SEPA, Historic Environment Scotland (HES) and EAC. The Contractor shall amend and update the CEMP as required throughout the construction period.	Pre-Construction and Construction
	The CEMP shall describe how the Applicant will ensure suitable management of the following environmental issues during construction of the Proposed Development: • noise and vibration; • dust and air pollution; • surface and ground water; • ecology (including protection of habitats and species); • cultural heritage;	Pre-Construction



Subject Area	Commitment	Timing
Construction Environmental Management Plan (CEMP)	- waste (construction and domestic); - pollution incidence response (for both land and water); and - site operations (including maintenance of the construction compound, working hours and safety of the public).	
	The CEMP is anticipated to include, or cross-reference to, the following documentation: - Construction Methodology Statements (CMSs); - Construction Traffic Management Plan (CTMP); - Pollution Prevention Plan (PPP); - Site Waste Management Plan (SWMP); - Drainage Management Plan (DMP); - Peat Management Plan (PMP) (refer to an outline plan in Technical Appendix 8.2); - Biodiversity Enhancement Management Plan (BEMP) (refer to an outline plan in Technical Appendix 6.6); and - Any agreed mitigation plan(s), e.g. a Written Scheme of Investigation (WSI) for management of potential direct impacts on cultural heritage assets and potential archaeological finds.	Pre-Construction
	Sedimentation Pollution and Erosion - Good practice measures would be applied in relation to pollution risk, sediment management, peat management and management of flood risk and surface runoff rates and volumes. These would form part of the final Construction Environmental Management Plan (CEMP) which would be prepared during the detailed design stage of the project and secured by a planning condition prior to construction commencing.	Pre-Construction
	The final CEMP would also include details and responsibilities for environmental management on-site and would outline the necessary surface water management, oil and chemical delivery and storage requirements, waste management, traffic and transport management and would specify response procedures to environmental any incidents as well as monitoring requirements for wastewater, water supply and all appropriate method statements and risk assessments for the construction of the Proposed Development.	Pre-Construction, Construction and Operational
	Drainage - Prior to construction, site-specific drainage plans would be produced. These would consider any existing local drainage which may not be mapped and incorporate any site-specific mitigation measures identified during the assessment. Measures would be included in the final CEMP for dealing with potential pollution, sedimentation and flood risk incidents and would be developed prior to construction. This would be adhered to should any incident occur, reducing the effect as far as practicable.	Pre-Construction



Subject Area	Commitment	Timing
Operation Environmental Management Plan (OEMP)	The Applicant will implement an Operation Environmental Management Plan (OEMP). Similar to the CEMP, the OEMP will set out the mitigation measures described in the EIAR, and how the Applicant will manage and monitor environmental effects throughout the operation of the Proposed Development. The OEMP will also be developed in consultation with EAC, SEPA, NatureScot and HES where relevant.	Pre-Operational
Outdoor Access Management Plan	Prior to construction of the Proposed Development, an Outdoor Access Management Plan (OAMP) will be prepared in consultation with EAC. It will detail the maintenance of safe public access routes within and around the Site during construction and long-term public access during operation of the Proposed Development. Throughout construction, measures to manage diversions of public access routes would be agreed with the relevant authorities. The diversion routes would be clearly marked and for safety reasons would direct the user away from any areas of construction. It is proposed that further details would be provided in an OAMP post-consent. Although members of the public have the right to roam land in Scotland under the Land Reform (Scotland) Act 2003 there will be restricted access around the Proposed Development during the construction phase for health and safety purposes.	Pre-Construction, Construction and Operational
Acoustic Barriers	Temporary acoustic barriers will be painted green when used.	Construction
Design	The turbines will be painted an off-white colour with a low reflectivity semi-matt finish.	Pre-Construction
Archaeological Watching Brief	There is some potential for the survival of hitherto unrecorded sub-surface cultural heritage remains within the Proposed Development. East Ayrshire Council may require mitigation for this potential, which could take the form of an archaeological watching brief during the Construction phase of the Proposed Development.	Pre-Construction and Construction
Ecological Clerk of Works (ECoW)	A suitably qualified ECoW will be appointed prior to the commencement of construction to advise the Applicant and the Principal Contractor (PC) on all ecological matters. The ECoW will be required to be present on-site during the construction phase and will carry out monitoring of works and briefings with regards to any ecological sensitivities on the Site to the relevant staff of the PC and any sub-contractors.	Pre-Construction and Construction
Species Protection Plan (SPP)	Species Protection Plan (SPP) will be implemented during the construction phase. The SPP details measures to safeguard protected species known or likely to be in the area. The SPP includes pre-construction surveys and good practice measures during construction. Pre-construction surveys will be undertaken to check for any new protected species or features in the vicinity of the construction works in order to establish the most up-to-date baseline. The results of the pre-construction surveys will be used to update the outline SPP ahead of construction starting. The SPP will remain a live document to be updated as required and in agreement with the ECoW where changes to the distribution and status of protected species and features are recorded.	Pre-Construction
Micrositing	Any micrositing of infrastructure will be based on a review of existing ecological data and the completion of pre-construction surveys, to take into consideration the potential for direct encroachment onto protected species features, sensitive habitats or GWDTEs, or indirect alteration of hydrological flows supporting sensitive habitats or GWDTEs. Any micrositing will also take into consideration any buffer distances on protected features identified, as detailed within the SPP	Pre-Construction and Construction
Bat Mitigation and Monitoring Plan (BMMP)	Bat mitigation and monitoring delivered via a BMMP to determine the requirement for, and if required, the details of, any curtailment plan required to reduce collision/barotrauma risk to high collision risk bat species present on the Site. Agreement and implementation of the BMMP can be secured via an appropriately worded planning condition.	Post-Construction and Operational
Biodiversity Enhancement Management Plan (BEMP)	Would ensure the Proposed Development secures creation, restoration and enhancement of a suite of habitats of conservation value. Agreement and implementation of the BEMP to be secured via an appropriately worded planning condition. Enhancement, restoration and creation of habitats of conservation value and interest through the delivery of a BEMP would reduce effects on habitats further and provide additional suitable and key habitat for a range of flora and fauna. Overall, the BEMP would deliver significant biodiversity enhancement at the Proposed Development, in line with objectives outlined in NPF4 Policy 3¹ the Onshore Wind Policy Statement² and the Scottish Biodiversity Strategy to 2045. The BEMP should incorporate: Avoidance of planting within 750 m of the identified hen harrier roost; and	Construction and Operational

¹ Scottish Government (2023). National Planning Framework 4. Available at: <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/02/national-planning-framework-4/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4.pdf> (Accessed: August 2026).

² Scottish Government (2022). Onshore Wind Policy Statement 2022. Available at: <https://www.gov.scot/publications/onshore-wind-policy-statement-2022/> (Accessed: August 2026).



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	Provision and enhancement of habitats for breeding/roosting waders.	
Decommissioning Environmental Management Plan (DEMP)	Would include pre-decommissioning surveys, adherence to the Decommissioning Environmental Management Plan (DEMP), presence of an ECoW and adherence to a SPP.	Decommissioning
Bird Disturbance Management Plan (BDMP)	Inclusion of species-specific restrictions to ensure legislative compliance and avoid (or otherwise minimise) the disturbance to: • Roosting/wintering hen harrier • Breeding/roosting peregrine falcon • Breeding/roosting red kite Breeding/roosting waders, with particular reference to golden plover, lapwing, curlew and ringed plover	Pre-Construction and Construction
Livestock carcass monitoring	Regular checking and removal of any livestock carcasses within the turbine array to minimise risk to birds of collision with turbine blades.	Operational
Confirmatory Water Quality Monitoring	A programme of water monitoring is proposed prior to any construction activity, during construction and immediately post construction of the Proposed Development. The monitoring programme would be agreed with EAC and is expected to include monitoring of the watercourses which drain from the Site to ensure there are no effects to the water environment. This will also include watercourses where the Proposed Development encroaches into the watercourse buffers and where additional mitigation measures have been committed.	Pre-Construction, Construction and Operational
Operational Wind Turbine Noise Curtailment Strategy	Preparation and implementation of a final operational noise management strategy based on the selected turbine model and warranted acoustic data. The strategy will identify the noise-reduced operating modes required at each relevant turbine and wind speed to meet the day and night Site-Specific Noise Limits (SSNLs). Approval and implementation of the strategy, together with ongoing compliance with the SSNLs, can be secured through an appropriately worded planning condition.	Pre-Construction
BESS and Substation Acoustic Design	Detailed acoustic design of the BESS, substation and associated fixed plant to ensure that the combined BS 4142 rating level does not exceed 35 dB at any noise-sensitive receptor during the relevant assessment period. Compliance will be achieved through appropriate plant selection, enclosures, attenuation, orientation and screening, and secured through an appropriately worded planning condition.	Pre-Construction and Construction
Construction Traffic Management Plan (CTMP)	A CTMP would be prepared, which would describe measures that would be implemented to control construction-related vehicles travelling to and from the Proposed Development. The submission of a CTMP could be made a condition of any consent granted for the Proposed Development. The types of matters that would be covered in the CTMP include: • Project Information: ○ Details of type and number of vehicle movements expected; ○ Details of the routes expected to be taken by HGVs; and ○ Details of abnormal indivisible load vehicle (AILV) movements (including timing, routes, escorts, notification proposals and extent of any accommodation works). • Physical measures: ○ Arrangements for on-site temporary parking areas; ○ Arrangements for wheel cleaning prior to entering public road; ○ Sheeting of HGVs to prevent dust; and ○ Any temporary speed reductions that may be required along with measures (such as vehicle activated signs) to encourage compliance. • Communication measures: ○ Arrangements for communicating with interested parties, including elected representatives and community councils;	Pre-Construction and Construction



Subject Area	Commitment	Timing
	○ Arrangements to communicate with local farms to understand timings when they have to take livestock across the A70 and to identify suitable coordination measures; ○ Arrangements to agree protocol with emergency services; and ○ Arrangements for disseminating project information, including weekly updates of expected vehicle movements and work locations. • Enforcement measures: ○ Measures to encourage compliance with the identified routes; ○ Timing of deliveries to avoid any sensitive times (e.g. school start and finish times); ○ Code of conduct for HGV drivers; ○ 'Tool box talks' on relevant subjects, such as the British Horse Society's guidance document to drivers of large vehicles; ○ A requirement that all HGVs operated by the Principal Contractor (PC) must have Global Positioning System (GPS) trackers, allowing their speed and routeing to be recorded; ○ Contingencies for unobstructed access for emergency services; and ○ Procedures for dealing with non-compliance with the CTMP. • Maintenance measures: ○ Arrangements for liaison regarding winter maintenance; ○ Arrangements for cleaning any sections of public road affected by material deposited from vehicles related to the construction of the Proposed Development; ○ Arrangements for before-construction and after-construction road condition surveys, including an agreement under Section 96 of the Roads (Scotland) Act 1984; and ○ Arrangements for remediation measures. • Management of CTMP: ○ Arrangements for monitoring and updating the CTMP; ○ Confirmation of a named person with responsibility for implementation of the CTMP (including contact details); and ○ Development of a Travel Plan for staff, aimed at reducing the number of single-occupant car movements to and from the Proposed Development.	
Aviation – Instrument Flight Procedures (IFPs)	The aerodrome licence holder shall, if appropriate, independently re-issue the procedures related to an aerodrome as soon as possible if the changing obstacle environment or aerodrome operational requirement dictates an amendment to procedures, either laterally or vertically. During annual maintenance review an appointed and CAA Approved Procedure Designer will review the IFPs published for the given aerodrome and assess their compliancy to ICAO criteria – as well as ensuring that the applicable obstacle clearance is achieved for all procedures considering the latest aerodrome and obstacle survey data available at the given date. As an output from the review, the Procedure Designer will provide a list of recommended changes to the Proposed Development, to be actioned on the IFPs to ensure they remain compliant to criteria as well as provide the required clearance margin over terrain and obstacles surrounding the airport. If a change to the procedures is required, consideration will be given to any new dominant vertical obstacle(s) that require a change to the level previously provided in a particular segment/area of the IFP charts related to the aerodrome. This new level will provide a minimum of 300 m obstacle clearance for IFR flights.	Pre-Construction
Aviation – Radar Infrastructure	National Air Traffic Services (NATS) radar systems impacted (Lowther Hill PSR) - previous acceptable mitigation of wind turbine impact to these systems has been achieved through agreement by NATS of radar optimisation and in some cases, infill. The Lowther Hill Indra Primary Surveillance Radar (PSR) incorporates the latest technologies for en-route air route surveillance which might provide an enhanced capability to	Pre-Construction, Construction and Operation



Subject Area	Commitment	Timing
	mitigate wind turbine effect. However, optimisation of the radar system to mitigate the potential impact of the Proposed Development will be required and will need to be agreed by NATS. Glasgow Prestwick Airport (GPA) Terma PSR - previous acceptable mitigation of wind turbine impact to these systems has been achieved through agreement by GPA of updates to processor, data access / storage. The GPA Terma PSR incorporates the latest technologies for terminal surveillance which provides an enhanced capability to mitigate wind turbine effect. However, optimisation of the radar system to mitigate the potential impact of the Proposed Development will be required and be agreed by GPA.	
Aviation – VHF communications	CAA guidance on this subject is contained within CAP 670: <i>Air Traffic Services Safety Requirements</i>, which sets out a two-step process. 1. Determine through theoretical mathematical modelling, the conceptual effect of the Proposed Development. The worst-case mathematical modelling assumes that the turbines would be always facing the VHF radio antenna to create a safety-conservative, worst-case scenario (despite this not being physically probable). 2. GPA to then assess the potential for operational impact (including cumulative effect), based on the theoretical results of the first step, mathematical modelling, and hence sensitivity to the Proposed Development.	Pre-Construction, Construction and Operation
Shadow Flicker Protocol	In order to ensure that potential shadow flicker effects do not occur at any property, the Applicant proposes that prior to the erection of the first turbine a written scheme (known as the 'Wind Farm Shadow Flicker Protocol') will be submitted to and approved in writing by the Local Planning Authority. This will set out mitigation measures to eliminate shadow flicker attributable to the Proposed Development as well as a protocol for addressing a complaint received from any receptor.	Pre-Construction
	Mitigation measures could include the provision of local screening to reduce or block shadow flicker affecting a receptor. Should screening provision not be possible, the most effective mitigation measure to mitigate shadow flicker is by selective automatic turbine shutdown during the times of year when shadow flicker is predicted, if the weather conditions are correct. The relevant technology which will allow for the automatic shutdown of the turbine will be fitted to the Proposed Development turbines and details included within the 'Wind Farm Shadow Flicker Protocol'.	Pre-Construction and Operational

