

PH101761 - CABLE ID 109

KERRERA – MULL CABLE SHORE END REMEDIAL WORKS

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP)

PH101761 – CABLE ID 109	Kerrera – Mull Cable Shore End Remedial Works CEMP	Applies to	
		Distribution ✓	Transmission
Revision: 1.00	Classification: Public	Issue Date: Nov 24	Review Date: Nov 24

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List of Terms and Abbreviations

Term	Definition
ACoW	Archaeological Clerk of Works
CAR	Controlled Activities Regulations
CEMP	Construction Environmental Management Plan
COSHH	Control of Substances Hazardous to Health
ECoW	Ecological Clerk of Works
EPS	European Protected Species
GEMP	General Environmental Protection Measures
GPP	Guidance for Pollution Prevention
HRA	Habitats Regulation Appraisal
MCA	Marine Consultation Zone
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MPA	Marine Protected Area
NMP	Scotland's National Marine Plan
NNR	Natural Nature Reserves
OOS	Out of Service
PPG	Pollution Prevention Guidance
SAC	Special Area of Conservation
SEPA	Scottish Environment Protection Agency
SHEPD	Scottish Hydro Electric Power Distribution plc
SSSI	Site of Special Scientific Interest
SWMP	Site Waste Management Plan

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1 Overview

1.1 Introduction

This Construction Environmental Management Plan (CEMP) has been prepared by Scottish Hydro Electric Power Distribution plc (SHEPD).

During routine inspections by SHEPD, essential maintenance works were identified to ensure a secure, safe supply of electricity to the islands and to ensure the safety of the public when using the beaches where cable landfall occurs. An appointed Contractor will be appointed to carry out these works on behalf of SHEPD.

The following sites have been identified for remedial work:

- Kerrera – Mull (Mull Shore End) (SSEN ID 109)

This plan details project specific construction and environmental management measures in respect of works associated with maintenance work on the exposed electricity cable at the shoreline locations.

1.1.1 Scotland’s National Marine Plan (NMP)

Scotland’s National Marine Plan is a framework introduced in Scotland through the Marine (Scotland) Act 2010. This framework aims to promote sustainable development and use of marine areas, while enabling emerging maritime industries and provisioning existing users.

The proposed works consider NMP Cable 2 and Cable 3 policies.¹

Cable 2 – In terms of submarine cable development and activities; where burial cannot be achieved to protect and stabilise the cable, cables can be protected through other recognised methods (cable armouring, rock bags, mattresses etc.)

Cable 3 – A risk-based approach has been adopted when considering the removal of out of service cables, where considerations to keep the cable in-situ versus removal to minimise the impact on marine historic and natural environments as well as other marine users.

1.1.2 CEMP Overview

This CEMP provides information and guidance on the following topics:

- Waste Management
- Ecology
- Air Quality
- Water Quality Protection and Pollution Prevention
- Noise Management
- Soil Management
- Archaeology and Cultural Heritage
- Emergency Procedures

This document also provides further detail and protection measures, and include:

- Otter Protection Measures
- Breeding Bird Protection Measures

¹[14. Submarine Cables - Scotland's National Marine Plan - gov.scot](https://www.gov.scot/publications/nmp/sections/submarine-cables/pages/14-submarine-cables-scotland-s-national-marine-plan-gov.scot)

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Site specific environmental issues and required mitigation measures are provided in Section 4 Environmental Management as well as CEMP Requirements and SHEPD standard mitigation requirements are found in Table 7.

These Tables must be reviewed and completed by the Contractor Site Manager and checked periodically by the Ecological Clerks of Work (ECoW). Table 7 will be signed off by the SHEPD Project Manager at the end of the project.

The following appendices provide further detail and control measures, and include:

Appendix A: SSEN General Environmental Management Plans (GEMPs)

Appendix B: Otter Species Protection Plan

Appendix C: Bird Species Protection Plan

Appendix D: Proposed Access Route

This CEMP is a live document that will be reviewed at regular intervals by the contractor onsite team and the appointed ECoW to reflect the progress of works, any changes in environmental requirements and to account for any emerging best practice or updates (from either statutory bodies or client/contractor best practice).

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1.2 Project Description

1.2.1 Overview

The proposed project includes remedial works on the Mull shore end on the Kerrera – Mull in-service cable as seen in Figure 1 below. Please refer to the Table 1 for the proposed working corridor of the proposed works.

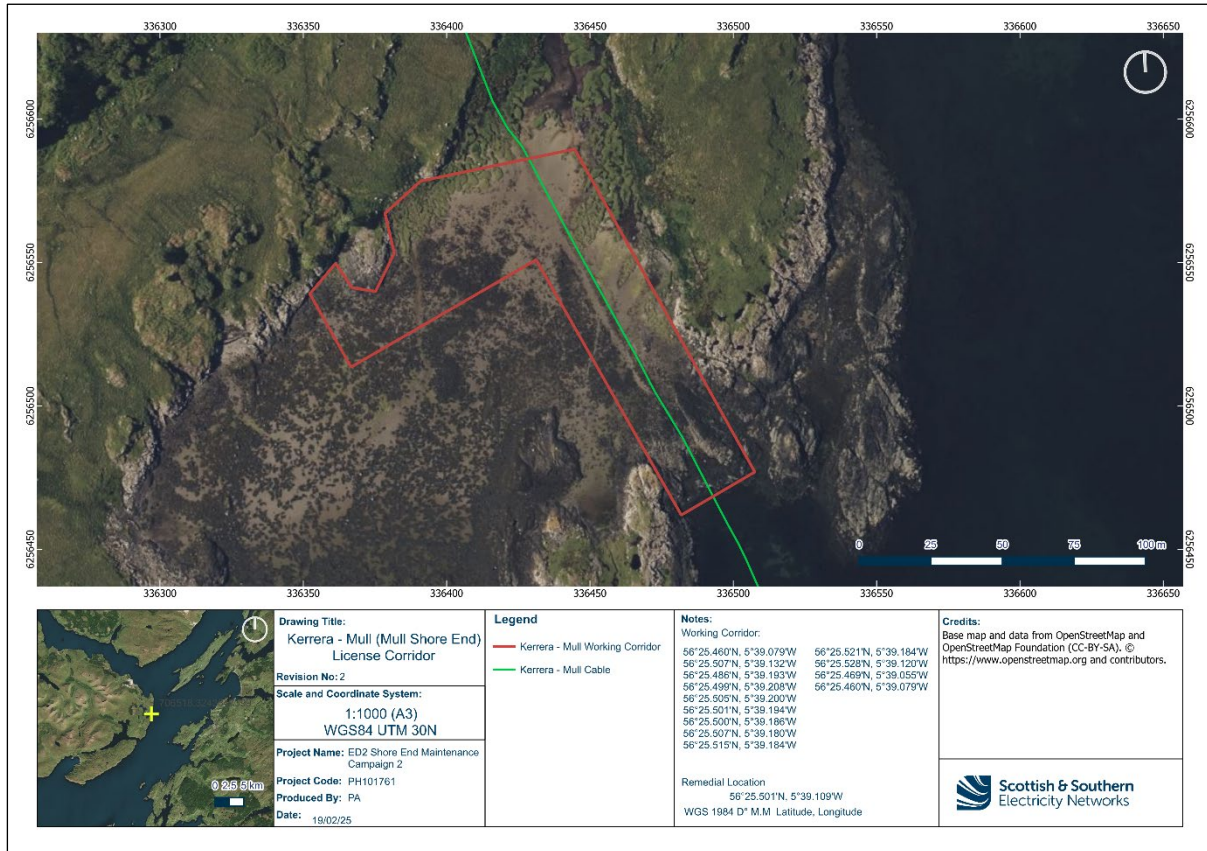


Figure 1 – Kerrera – Mull (Mull Shore End) Location Map and License Corridor

1.2.2 Project Methodology

For cables requiring remedial work the following methods may be applied:

- Reburial of exposed sections of electricity cable from mean low water springs (MLWS) to mean high water springs (MHWS).
- Where burial is not feasible; manual placement of iron shells (split pipe) along exposed sections of cable for protection and stabilisation.
- Replacement of damaged sections of iron shells (split-pipe) for protection and stabilisation.
- Removal of old concrete bags previously used for protection.
- Removal of out of service (OOS) subsea electricity cable from MHWS to MLWS.

The proposed works at all site locations will commence as soon as feasible, tide/weather permitting. Access will be taken using existing access tracks where possible and the excavator will be tracked to minimise ground pressure, please see Appendix D for indicative maps of likely site access.

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The proposed works align with the key objectives of the NMP in safeguarding marine submarine cables while considering environmental sensitivities and other users of the sea. There are minimal impacts on the marine environment and other users of the sea.

The proposed works will have negligible impact the local onshore and offshore environments of the area, and a minimal impact on the visual quality from the areas from remedial work on exposed infrastructure. No marine noise or disturbance on the marine environment will be produced from the proposed works.

Table 1 – Working Corridor Coordinates

Landfall	Remedial Location	NW Corridor	NE Corridor	SW Corridor	SE Corridor
Mull	56°25.501'N 5°39.109'W	56°25.499'N, 5°39.193'W	56°25.528'N, 5°39.120'W	56°25.486'N, 5°39.193'W	56°25.469'N, 5°39.055'W

Table 2 – Planned Works at Each Location

Cable Route	Landfall	Cable Removal	Split Pipe Installation	Concrete Bag Removal	Cable Burial
Kerrera-Mull (SSEN 109)	Mull	No	Yes – max 50m length (includes 25% contingency)	No	No

1.2.3 Reburial of Exposed Sections of Cable

No reburial of the cable is required. A site visit in July 2024 identified that the cable remained buried from above MHWS to halfway down the foreshore where the cable was then surface laid and protected with split pipe to below MLWS, as shown in Figure 2.

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Figure 2 – Cable with split pipe protection on lower shore

1.2.4 Installation of Split Pipe

1. Placement of split pipe/iron shells.
2. Mobilisation of 3 tonne excavator (indicative), mobile welfare unit (suitable for a max. of 8 personnel) and equipment close to the project location.
3. The iron half shells will be delivered by HIAB lorries close to the project location.
4. Iron shells will then be transferred from the HIAB lorry into a tracked excavator for transport to the cable.
5. Where necessary, loose stones from low water or shore end will be cleared from around the cable using a small excavator or manually by hand.
6. Individual iron half shells will be manually placed around the exposed cable. To ensure that they sufficiently cover the cable the two half shells will be fused together.
7. The half shell will then be secured to each other and held in place by clamps.
8. Removal of any excess shells and equipment from the project locations.
9. The shells will stay in place until further maintenance work is required.

1.2.5 Removal of OOS Cable

There will be no removal of OOS cable for these works.

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1.3 Construction Programme

The timing of works is dependent upon an appropriate tide, ideally a low spring tide. The timing of works are still to be agreed but could occur anytime between late summer 2025 and summer 2026, with an expected duration of 2 to 3 days.

1.4 Onsite Roles and Responsibilities

Table 3 shows the SHEPD Project management roles and named personnel accountable for and relevant to the implementation of the CEMP.

Table 3 – Management Roles and Personnel

Role	Responsibility	Contact Details
Project Manager (SHEPD)	<ul style="list-style-type: none"> Oversee the project to ensure that the CEMP is completed; and, Ensure the Construction Manager(s), Site Manager(s), Project Environmental Manager/ECOW(s) and Consultant Archaeologists are aware of the requirements of the CEMP and that these requirements are carried out in line with requirements. 	Kevin Wilson Scottish and Southern Electricity Networks Inveralmond House 200 Dunkeld Road Perth PH1 3AQ [Redacted] T: +44 1738 341968 [Redacted]
Contracts Supervisor (SHEPD)	<ul style="list-style-type: none"> Oversee the onsite construction works to ensure that the CEMP is completed; and, Ensure the Construction Manager(s), Site Manager(s), Project Environmental Manager/ECOW(s) and Consultant Archaeologists (where required) are aware of the requirements of the CEMP and that these requirements are carried out in line with requirements. 	TBC upon awarding of contract.
Contractor Project Manager (On-site or delegate to Site Supervisor)	<ul style="list-style-type: none"> Ensure the implementation of the CEMP; Ensure that the workforce is made aware of environmental risks relating to the project; Ensure that environmental incidents are reported to the company Helpline and to the Client in line with reporting timescales and requirements; Ensure that environmental issues are included in site management meetings; Ensure that site environmental controls are regularly monitored and recorded; Ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment; 	TBC upon awarding of contract.

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	<ul style="list-style-type: none"> ▪ Co-ordinate and manage the identified environmental issues on the project; and, ▪ Undertake regular environmental monitoring. 	
Project Environmental Manager and ECoW (On-site as required)	<ul style="list-style-type: none"> ▪ Ensure the implementation of the CEMP; ▪ Ensure that the workforce is made aware of environmental risks relating to the Project; ▪ Ensure that environmental incidents are reported to the company Helpline and to the Client in line with reporting timescales and requirements; ▪ Co-ordinate and manage the identified environmental issues on the Project; ▪ Ensure that environmental issues are included in site management meetings; ▪ Ensure that site environmental controls are regularly monitored and recorded; ▪ Ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment, and where necessary updates/amendments to the CEMP are completed; ▪ Undertake regular environmental monitoring and inspections, and record the results; ▪ Ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment, and where necessary updates/amendments to the CEMP are completed; ▪ Provide additional technical support to the Project as required by the Project Manager/Site Supervisor/Contractor Project Manager; and, ▪ Investigate any significant environmental incidents that occur on the Project. 	<p>Ecologist/ECoW TBC upon awarding of contract.</p> <p>Project Environmental Manager Lorna Wilkie [Redacted] [Redacted]</p>

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2 General Arrangements

2.1 Hours of Work

Construction activities will be undertaken from Monday to Friday between 07:00 and 19:00, dependant on daylight and tide. If works are to be undertaken out with of these timings and/or across the weekend, the Local Planning Authority will be notified, and permissions will be confirmed prior to commencement of work.

2.2 Management of Works

Table 4 – Management Roles

Role	Name and Contact Details
SSEN Project Manager	Kevin Wilson Tel: 01738 453723, Mob: [Redacted] E: [Redacted]
SSEN Project Environmental Manager	Lorna Wilkie M: [Redacted] E: [Redacted]
SHE (Safety Health Environment)	Paul Webster Tel: [Redacted] E: [Redacted]
Site Supervisor	TBC on awarding of contract
Contractor Project Manager	TBC on awarding of contract
ECoW	TBC

2.3 Training and Awareness

As part of site induction for all personnel, a copy of the CEMP will be provided to and discussed with all onsite staff. This will include discussing the elements outlined in the CEMP including sensitive receptors on site and measures in place to mitigate impacts on these receptors.

The ECoW will develop and deliver environmental toolbox talks relevant to elements of the CEMP such as otters, nesting birds and seals and when working in areas with sensitive receptors e.g. near landfall, or, where there is potential to impact sensitive receptors on site. Training records of all personnel on site should be reviewed and copies held centrally. This is particularly important for those operating excavators, other heavy machinery and with environmental certification to deal with incidents on site.

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2.4 Communication, Monitoring and Reporting

Table 5 describes the mechanisms for the communication of environmental risk and the frequency at which they shall be completed.

Table 5 - Communication and Frequency

Meeting/Briefing	Frequency
Progress Reporting	Daily
HSEQ and Progress Meeting	Weekly
Daily Site Team Briefing	Daily
Risk Assessment/Method Statement Briefings	Each job task
Environmental Toolbox Talks including good environmental practice	Prior to commencement of works
Site Induction	On first attendance at site

Suitable monitoring of the CEMP implementation is required. This is an identified activity of the ECoW. Monitoring of the CEMP implementation will be undertaken during all site visits by the ECoW. A suitable monitoring procedure must be defined, and agreed by, the ECoW and SHEPD Project Environmental Manager in advance of works commencing.

3 Site Management

3.1 Site Layout and Housekeeping

Mobile welfare units will be available to site personnel and will not require any ground preparation. Material laydown areas shall be limited to short durations and be in the immediate vicinity of the works, i.e. iron shells delivered to site prior to work commencing. The site will be always maintained in a tidy and well-managed state.

3.1.1 Welfare Facility

Welfare facilities on site will be sufficient to adequately accommodate all site personnel.

3.1.2 COSHH Assessment

All substances identified as hazardous will be Control of Substances Hazardous to Health (COSHH) assessed and appropriate COSHH sheets for each individual material type retained on site and accessible to all works personnel. The use of non-assessed substances is prohibited. All operatives are required to comply with the controls specified within COSHH assessments. All COSHH items will be stored in a secure, ventilated store, separate from non COSHH items. All COSHH waste items will be discarded within a defined COSHH waste storage receptacle until being removed from site by a suitably licenced contractor (suitable for the removal of hazardous wastes).

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COSHH assessments cover all range of materials and are not limited to construction associated items and will additionally be provided for any domestic cleaning materials used on site (e.g. bleach).

3.2 Site Traffic

Traffic during construction will be minimal and restricted to a small number of works vehicles and machinery. Access will be taken using existing access tracks where possible. All traffic shall be escorted in by approved site personnel. Please refer to Appendix D for an indicative access route, the final access route will be added to the CEMP once the access route has been finalised.

3.3 Plant and Equipment

Construction vehicles and plant shall be regularly maintained. Emergency maintenance to construction plant will be carried out on site, where practicable, in a designated area and on an impermeable surface in order to contain any environmental risk posed by vehicle and plant maintenance.

A lockable bunded fuel bowser constructed in accordance with SEPA Guidelines – Guidance 2, will be used for refuelling on site.

Where relevant, refuelling shall take place at a dedicated refuelling area. Where this is impracticable, a nominated Fuel Marshal shall be responsible for overseeing refuelling activities and to ensure that refuelling of mobile plant does not take place within 30m of a water environment. The refuelling bowser shall be equipped with a spill kit and personnel will be trained in its use as part of the site induction training.

All construction vehicles and mobile plant operators shall have easy access to spill kits during vehicle and mobile plant operation through a combination of vehicle spill kits and larger capacity fixed location spill kits. Plant nappies/drip trays shall be utilised for stationary plant and regular inspection arrangements shall be in place. Where plant is left stationary in excess of one hour, plant nappies will be required. No idling is permitted on plant and vehicles on site, to reduce unnecessary emissions from being released to the atmosphere.

3.4 Contractor's Plant

The appointed Contractor will provide a list of plant proposed to be used to undertake the works. The Contractor Project Manager must be provided with this list prior to works commencing. It will be the responsibility of the SSEN Project Manager to approve all as appropriate.

3.5 Lighting

Lighting will be directional and positioned to minimise light spill outside the site compound/works area. Particular care should be taken to avoid light spill on known sensitive receptors (such as the shore). No artificial lighting should directly illuminate otter foraging/commuting habitat and/or be left on overnight in proximity to such features unless authorised by the appointed ECoW. It is not anticipated that artificial lighting will be required due to adequate daylight hours to complete the tasks.

3.6 Air Quality Control Measures

Emissions to the atmosphere in terms of gaseous and particulate pollutants from vehicles and plant used on the site, will be controlled and limited as far as reasonably practicable.

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The following control measures will be implemented to minimise the risks to air quality on and off site:

- Vehicles, plant and equipment will be regularly serviced and inspected, and any defects e.g. leaks or dark smoke, reported and removed from use or rectified immediately.
- Records of plant and equipment maintenance/inspections will be available on site for inspection.
- Engines will be turned off when not in use.

3.7 Waste Management

Waste is defined as “any substance or object which the holder discards, intends to discard or is required to discard”. This includes materials that other people want, or for which they can find a beneficial use i.e. material that is to be recovered / recycled. In any construction project, there may be a variety of different wastes, from office and canteen waste to construction materials, waste oils, asbestos and clinical waste that will require management.

The appointed contractor will be required to compile a site waste management plan (SWMP) in accordance with the principles below:

- Waste minimisation.
- Allocate a member of staff to be responsible for the SWMP.
- Record types and quantities of waste that will be produced during the project.
- Decide how waste arising will be managed in line with the waste hierarchy.
- Plan for efficient materials and waste handling and set key performance indicators (KPIs) for reduction targets.
- Measure quantities and types of waste produced and compare against targets.
- Monitor the implementation of the SWMP and update as necessary.
- Compile a waste budget.

Waste management and practical actions that can be undertaken on site should follow the principles of the waste hierarchy as illustrated below:

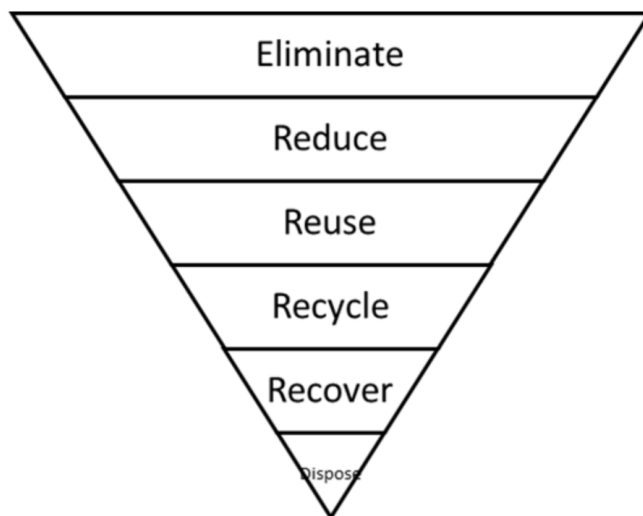


Figure 3 – Diagram of Waste Hierarchy

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Further guidance on waste management can be found in TG-NET-ENV-516 Waste Management GEMP in Appendix A – SSEN General Environmental Management Plan.

4 Environmental Management

4.1 Introduction

Table 6 – Description of Site-Specific Designations

Designation	Description of Sensitivities
Special Area of Conservation (SAC)	Areas considered to be important for certain habitats and non-bird species of interest in a European context. One of the main mechanisms by which the EC Habitats and Species Directive 1992 will be implemented.
Special Protection Areas (SPA)	Sites of Special Scientific Interest (SSSIs) are those areas of land and water that best represent natural heritage in terms of their: <ul style="list-style-type: none"> • flora – i.e. plants • fauna – i.e. animals • geology – i.e. rocks • geomorphology – i.e. landforms • a mixture of these natural features
Marine Protected Area (MPA)	There are 36 Nature Conservation Protected Areas (MPAs) designated under the Marine (Scotland) Act 2010 and give protection to a wide variety of maritime habitats, species and geology.
Marine Consultation Area (MCA)	Marine Consultation Areas are non- statutory areas identified by NatureScot as deserving distinction in respect of the quality and sensitivity of the marine environment within them. Their selection encourages coastal communities and management bodies to be aware of marine conservation issues in the area.
RAMSAR	A Ramsar Site is a wetland site designated of international importance under the Ramsar Convention. The Convention on Wetlands, known as the Ramsar Convention, is an intergovernmental environmental treaty established in 1971 by UNESCO, and coming into force in 1975.
Natural Nature Reserve (NNR)	National Nature Reserves (NNRs) are areas of land set aside for nature. As in other countries, the accolade is given to Scotland's best wildlife sites, to promote their conservation and enjoyment. Most reserves contain nationally or internationally important habitats and species, so the wildlife is managed very carefully. Visitor facilities are designed and managed to ensure that people can enjoy NNRs without harming or disturbing the wildlife that lives there.

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4.2 Environmental Mapping

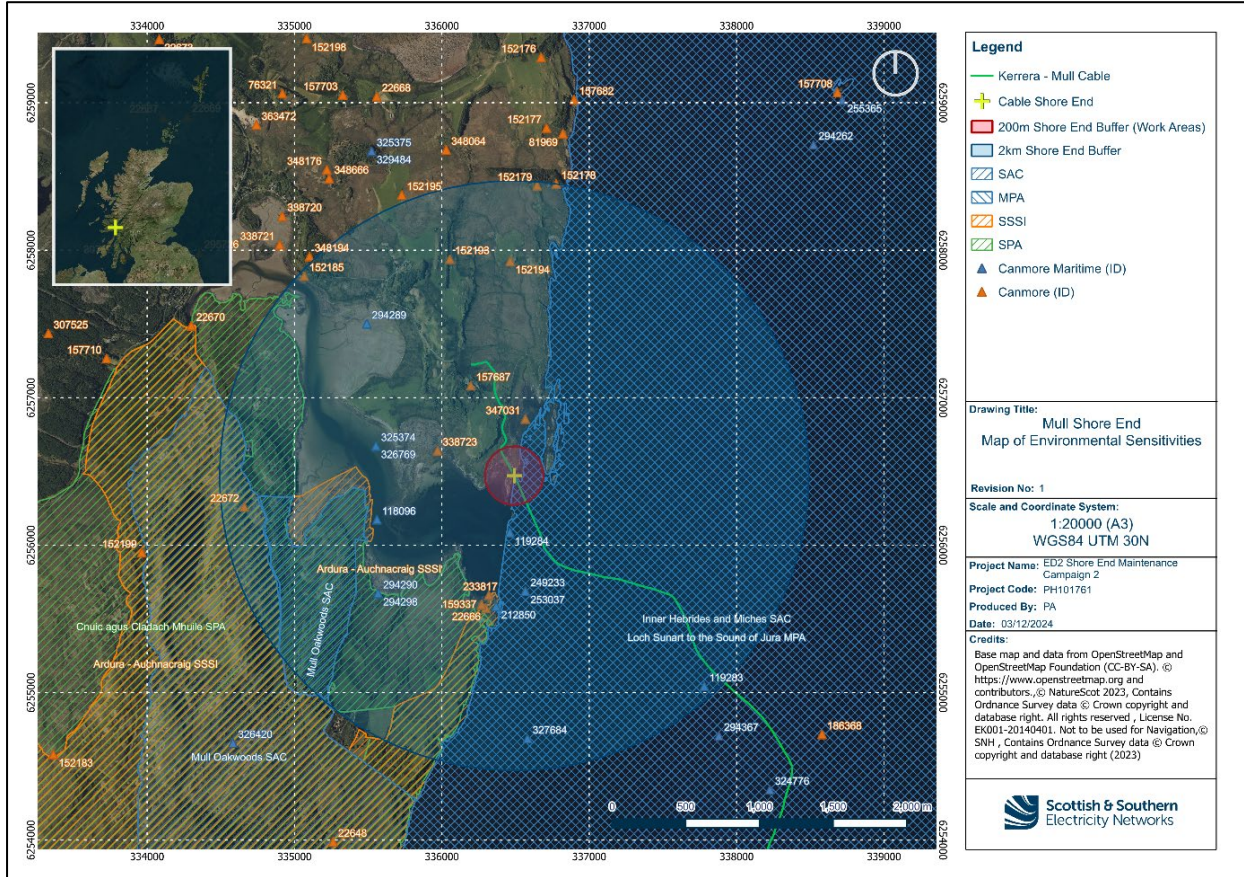


Figure 4 – Map of Environmental Sensitivities

Preconstruction surveys will be undertaken by the Client’s ecologist to identify ecological sensitivities within the works area buffer (200m) of the shore end and the proposed route of access. The information recorded will be passed to the Contractor.

Prior to commencement of the works, a preconstruction check for any ecological sensitivities will be undertaken by the ECoW.

4.2.1 Ecological Constraints

Works are due to commence during the breeding bird season. The Client’s ecologist will carry out a preliminary survey for breeding birds/breeding bird potential. The information recorded will be passed to the Contractor. No works shall begin in any area that has not had a nesting bird check carried out by the ECoW no more than 48 hours prior to works commencing. General mitigation measures can be found in Appendix C – Bird Species Protection Plan.

There is potential for otters to be present at any point along the cable route, especially landfall. A pre-construction survey for otters will be carried out by the Client’s ecologist, and appropriate licencing put in place if required. The information recorded will be passed to the Contractor. Should otter be found during works, work will be progressed in accordance with SSE’s Otter Species Protection Plan, please refer to Appendix B – Otter Species Protection Plan.

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There is an area of saltmarsh just below MHWS. If possible access to the shore for the excavator will be taken immediately to the west of this area across a rocky outcrop and onto the shore. If this is not possible then access will be taken across a narrow part of the saltmarsh and plastic matting will be laid temporarily across the saltmarsh to create a narrow route for the excavator.

There is the potential for seals to be present in coastal areas in the vicinity of the works. However, there are no designated haul-out sites within the works area. The NatureScot guidance for responsible behaviour around seals and other marine wildlife will be adhered to at all times.²

Works at landfall will be within 700m of the Cnuic agus Cladach Mhuile SPA (golden eagle) and adjacent to the Inner Hebrides & Minches SAC (porpoise) and Loch Sunart to the Sound of Mull MPA (skate). No works shall begin in any area that has not had a nesting bird check carried out by the ECoW no more than 48 hours prior to works commencing. If golden eagles are found, the Client and NatureScot must be informed.

Within 2km of the site search area are the Ardura – Auchnacraig SSSI and Mull Oakwoods SAC with a mix of designated woodland and wetlands habitats. These are located beyond the area of works and likely access route from the main road and the proposed work and access to site is unlikely to affect the SSSI and SAC.

Works will be carried out under a construction method statement to minimise the risk of impacting designated features, due to the small scale of the works it is likely that there will be no significant effect to existing sensitivities.

Where any unexpected species are located by any personnel on site, all works within that area must cease immediately. Site management and the ECoW must be informed immediately. No further work may take place within that area until confirmation has been given by the ECoW and site management.

4.3 Breeding Bird Protection Plan

Construction works have the potential to negatively impact on breeding birds as a result of either direct destruction of nests or disturbance which may result in breeding failure. In addition, some particularly sensitive species are liable to disturbance out with the breeding season.

Please refer to Appendix C – Bird Protection Plan. This plan highlights the responsibilities and procedures that must be followed if there is a potential for breeding birds to be affected. It highlights the responsibilities of SSEN and its appointed contractors the legislative protection of birds and measures required to minimise the impact of birds and reduce the risk of criminal offences from being committed.

4.4 Otter Protection Plan

Otter is a European Protected Species (EPS) and is afforded a high level of protection in Scotland.

Please refer to Appendix B – Otter Species Protection Plan. The Plan contains two parts and details the procedures that must be followed where there is potential for otter to be present (Part 1), and where a Project Licence for otter has been issued by NatureScot to cover the project (Part 2).

² [Scottish Marine Wildlife Watching Code | NatureScot](#)

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4.5 Archaeological Constraints

There are no designated archaeological/cultural heritage features within the area of works search area (200m) and on the route of access to the cable, as seen in Figure 4.

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4.6 CEMP Requirements

Table 7 – CEMP Requirements

Environmental Features	CEMP Requirement	Stage Required	Responsibility	Date Completed and Reviewed	Comments or Ongoing Actions
All	Pre-construction surveys and an ECoW pre-construction walkover will take place, to ensure that all environmental mitigation will be put in place throughout the construction period. The ECoW will monitor compliance throughout the construction period.	Pre-Construction	Appointed Contractor ECoW SSEN		
Terrestrial Ecology	All site personnel will attend a Tool Box Talk, as part of their site induction. The toolbox talk will include: <ul style="list-style-type: none"> an outline of roles and responsibilities relating to any marine / terrestrial ecology within or adjacent to site; a description of any key ecological features present, including photographs to help contractors recognise these; any specific mitigation measures that need to be implemented on site, including any required protection zones around any discovered sensitive habitat; and the procedure to follow if unexpected wildlife is encountered during the works. 	Pre-Construction	Appointed Contractor ECoW SSEN		
Terrestrial Ecology	Understanding and adherence to the proposed measures within the CEMP and method statement and the attached GEMPS (Appendix A) for standard best practice methods.	Pre-Construction	Appointed Contractor ECoW		

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			SSEN		
Otters	A pre-construction otter survey will be undertaken a maximum of 10 weeks prior to planned works. If required, this CEMP will be updated to reflect any results from the pre-construction survey. If an otter licence is required, this will be applied for immediately after the survey. During works the ECoW will carry out pre-works checks for otter and will put in place mitigation in accordance with the Otter Species Protection Plan.	Construction	Appointed Contractor ECoW SSEN		
Seals	There is potential for both harbour seal and grey seal to be present in coastal areas in the vicinity of the works. There are no known seal haul outs or breeding sites within 500m of the proposed working corridor. A pre-construction walkover will be undertaken by the ECoW and daily checks of the beach areas for hauled out seals will be performed in the vicinity of the landfall points (prior to the commencement of works that day). Any appointed contractors' personnel will be aware of the Scottish Government advice and responsible behaviour around seals:	Pre-Construction Construction	Appointed Contractor ECoW SSEN		
Birds	The proposed working area is not within an SPA, however the work site is adjacent to Cnuic agus Cladach Mhuile SPA (golden eagle) and close attention will be given to minimising disturbance to golden eagles. A pre-works walkover should take place no more than 48 hours in advance of works commencing. Should golden eagles be found with the disturbance distance of the work NatureScot must be informed and the works may then need a licence.	Pre-Construction	Appointed Contractor ECoW SSEN		

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	Breeding bird checks will be required to determine the presence of breeding birds within the area and any required mitigation. A pre-works walkover by the ECoW will be required to ensure that there are no breeding birds present. The walkover should take place no more than 48 hours in advance of works commencing. If required, all mitigation will be adhered to outlined in Appendix C – Bird Species Protection Plan.				
Habitats	Construction works will not take place in areas of saltmarsh and access to the shore for the excavator will avoid this habitat if possible. If not possible then plastic mats will be used temporarily to protect the saltmarsh.	Pre-Construction	ECoW SSEN		
Cultural Heritage	The National Record of the Historic Environment /Canmore does not indicate any archaeological features in the specified work areas; however, it is worth noting that any unexpected encounters of archaeological remains along the pre-existing cable routes, should be reported immediately to SSEN.	Pre-Construction	Appointed Contractor ECoW		

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5 Water Quality Protection and Pollution Prevention

5.1 Water Pollution Prevention

5.1.1 Drainage Management Strategy

During works there is the potential risk of polluting water environments from the following:

- Spillage of oils or other pollutants from machinery and vehicles.

5.1.2 Watercourse Pollution Prevention

The pollution prevention of groundwater is to be prevented by adherence to the Scottish Environment Protection Agency (SEPA) Guidance Pollution Prevention (GPP) series³ (with note of the former Pollution Prevention Guideline (PPG) series). Please also refer to Appendix A for TG-NET-ENV-512 GEMP Working in or Near Watercourses.

Training will be provided to on-site personnel via toolbox talks highlighting the risks of the polluting water environments during construction and highlighting sensitive locations.

Water quality monitoring by means of visual inspection will be undertaken, as a minimum, on a daily basis (and more frequently during periods of poor weather) of any areas considered at high risk during work activities. Temporary works areas will be sited at least 50m from the water environment including waterbodies where possible to reduce the potential for transmission of sediment laden run-off or accidental spillages.

5.1.3 Watercourse Crossing

Site investigations have indicated that there are no watercourses that would need to be crossed during operations. If at any time access to site needs to be altered and the need to cross a watercourse arises, this will be undertaken in line with SEPA's General Binding Rule 9 (1), specifically the following requirement: Following the operation of the machinery, any damage caused by the operation to the bed and banks of the surface water must be repaired, including re-establishing vegetation on any areas of bare earth on the banks resulting from the operation, either by covering the area with grass turfs or lining them with a biodegradable geotextile and seeding. Please also refer to Appendix A - TG-NET-ENV-515 GEMP Watercourse Crossings

5.1.4 Water/Ground Contamination (From Spillage)

Potential pollution of the water environment and groundwater is to be prevented during works by adhering to the following measures:

- All fuel storage containers must be labelled showing contents and maximum capacity.
- Plant nappies must be used during refuelling operations.
- All works within 30m of a water environment must be carried out following SEPA GPP guidance and following a site specific environmental briefing.
- Machine operators must carry out daily inspections of plant, including hydraulic lines. This will be recorded on a mobile plant and lifting equipment inspection check sheet.
- Spill kits must be readily available at all sites and with all items of mobile / static plant.

³ [Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

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- All sites must be kept tidy and clean. Materials and plant must be securely stored to avoid trespass and vandalism.
- All oil storage tanks, drums etc. must be placed on level ground with 110% bund containment and inspected daily (where applicable).
- During maintenance work on plant, appropriate containers and drip trays must be used to mitigate unavoidable spillage. Similar measures must also be used when re-fuelling.
- Any contamination of ground must be removed immediately, in such a manner that does not have the potential to cause further pollution to the surrounding environment. Contaminated soil is to be treated as Hazardous (Special) Waste and will be appropriately disposed of by a licensed waste contractor. All welfare facilities must have an appropriate system for the treatment or removal of foul waste and provision made for the regular removal of waste products. Please also refer to Appendix A – TG NET-ENV-512 – Working in or Near Water.

5.1.5 Fuel Storage

No refuelling is to take place within 30m of the water environment to prevent any potential spillages from polluting the water environment.

Fuel storage will be at the main compound situated on impermeable ground.

Refuelling of plant and machinery if required, will only take place within a defined area within site compounds.

Clearly defined areas for storage of oil and refuelling will be identified as part of the compound establishment process. Spill kits will be located and maintained at all oil storage and refuelling locations and in all site vehicles and plant.

5.1.6 Pollution Control

The primary method of pollution control is to seek to stop the action which is causing pollution immediately.

- Take immediate remedial action - block spill; place booms and absorbent materials to help soak up spill;
- Ensure all plant is double banded/double skinned/ appropriate drip trays in place to contain leakages; and
- Have control measures in place and have fully stocked spill kits easily accessible.

Works will be achieved in accordance with Appendix A – TG-NET-ENV-510 – Oil Storage and Refuelling.

5.2 Working In or Near Surface Waters

Construction activities in or near water have the potential to cause serious pollution or impact on the bed and banks of a watercourse and on the quality and quantity of the water. Most pollution incidents are avoidable. With careful planning the risk of site work causing pollution can be reduced. Many measures needed to prevent pollution are not expensive, especially if they are included at the planning stage of any activity. Major causes of environmental harm associated with working in or near watercourses include:

- Silt e.g. disturbance of riverbed or bank, dewatering and pumping of excavations, run-off from exposed ground, plant washing, roads and river crossings;
- Cement and concrete – which is very alkaline and corrosive and can cause serious pollution.

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- Chemicals and solvents – oil storage, refuelling, trade materials etc.
- Bridge cleaning debris – e.g. dust, debris & wastewater; · herbicides – e.g. aerial application.
- Waste materials (including special waste) e.g. oily wastes, spent acids and solvents.

Most activities with the potential for affecting watercourses or groundwater will require an authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).

The appointed contractor is required to comply with the following when conducting all activity:

- Identify all activities that will be undertaken in or near watercourses (including all identifiable drainage paths),
- Plan all works in accordance with best practice.
- Avoid works within 10m of a watercourse unless no other practical options exist and leave a vegetated buffer strip.
- Where works are undertaken within 10m of any watercourse or drain, ensure specific pollution prevention controls are in place.
- Communicate risks associated with working in or near watercourses to all personnel and include control measures in the site-specific construction method statements.
- Seek to avoid or minimise watercourse engineering works wherever possible.
- Ensure all necessary consents under the CAR are in place.
- Ask the Project Environmental Manager for advice in planning works in and near watercourses.
- Vehicles must not work within the water unless no other reasonable options exist.
- All construction machinery operating in-stream must be mechanically sound to avoid leaks of oils, hydraulic fluid, etc.
- Machinery must be steam cleaned and checked prior to commencement of in-stream works.
- All reasonable steps shall be taken to prevent the transport of sediments or other matter disturbed by the works.
- Keep site tidy and do not store materials close to watercourses or surface water features.
- Check if there are any timing restrictions to works because of protected species (e.g. spawning salmonids, otter, water vole, etc.) or landowner commitments.
- Ensure all required pre-construction surveys have been completed before starting works (these will include, where appropriate, freshwater pearl mussel, otter, water vole, etc.).
- Any temporary dams used must be designed to accommodate periods of high watercourse discharge, and dried out sections of bed must be check for stranded fish.
- Where pumps are used, back up pumps must be available. Pumps must be fitted with screens to prevent fish mortalities and ingress of debris, and the outfall to pumps be designed to prevent erosion of the receiving waters (i.e. by dissipating the flow);.
- Care must be taken to avoid pollution of watercourses with sediment and to ensure that any desilting works would not interfere with the bank sides.
- Vegetation removal must be minimised wherever possible.
- Where stock has access to the works fencing may be necessary in order to allow the regeneration of native riparian and aquatic marginal vegetation.
- Ensure construction works minimise disturbance to the current run-off regimes.

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5.2.1 Surface Water Controls

Locate and plan high-risk activities/areas away from watercourses and drainage paths.

Areas of high risk include:

- Fuel and chemical storage.
- Refuelling areas.
- Material stockpiles.
- Vehicle and equipment washing areas.
- Site compounds / parking areas.

Measures to minimise the volume of contaminated run-off being created include:

- Divert clean surface water away from areas using cut-off drains, catch pits and bunds (where necessary these can be lined).
- Do not allow water to drain down the length of a haul road. Roads should have adequate cambers to shed water quickly and if necessary, cut-off drains installed across the road.
- Minimise erosion of exposed soils and working areas.
- Minimise the area of exposed working area through phased construction.
- Reinstate exposed soil as soon as practical.
- Roughen exposed surface.
- Prevent water from leaving site prior to treatment.
- Ensure adequate buffer zones are identified between working areas and surface waters.
- Diversion drains should be used to catch sediment laden run-off and direct it to treatment facilities (where necessary these can be lined).
- Catch dirty run-off and treat through silt fences, silt traps, bunds, settlement tanks / lagoons, straw bales and geotextile etc. (see CIRIA C648⁴).
- Maintain all protective measures (e.g. change bales once sediment laden etc).
- Depending on the level of contamination, silty water can be pumped over land to filter through vegetation and infiltrate into the ground provided it is carried out in line with the CAR regulations. An appropriate buffer distance must be agreed with the Client to allow sufficient distance for the vegetation to filter the silty water prior to reaching a watercourse.

6 Noise and Vibration

6.1 General Principles

There is limited potential for noise impacts. Noise from maintenance works will be minimised using Best Practicable Means, as defined under Section 72, Part III of the Control of Pollution Act (CoPA) 1974. BS 5228 provides guidance on controlling noise from work sites in Clause 8, which will be followed where appropriate and practicable. Measures will be adopted on both Sites to reduce noise of equipment and the work including those listed below.

⁴ [CIRIA C648](#)

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7 Soil Management

Any activities related to soil removal, storage and reinstatement will be carried out in accordance with Appendix A - TG-NET-ENV-511 GEMP – Soil Management

Any unexpected, contaminated land will be managed according to Appendix A – TG-NET - ENV-517 GEMP – Contaminated Land

8 Peat Management

No areas of peat have been identified on site. If peat is found during site activities, any stripping, storage or reinstatement of peat will be managed according to the Appendix A - TG-NET-ENV-513 GEMP - Working in Sensitive Habitats.

9 Environmental Emergency Response Plan

9.1 Incident Reporting

In the event of a pollution event or environmental incident on site an Incident Report Form will be submitted to the SSEN Project Manager and SHE representative as specified in Table 8. If pollution enters a surface water drainage channel SEPA must be informed. Should pollution enter surface water or foul water drainage channels Scottish Water and Local Authority must also be informed. Should an environmental incident or pollution event take place at the shore end location of the works that discharges to the littoral and tidal area, or to sea, this will be reported to SSEN immediately, and SEPA will subsequently be contacted for direction.

9.2 Environmental Emergency Contacts

Table 8 – Environmental Emergency Contact Details

Contact	Contact Details
Contractor Project Manager (TBC)	TBC upon awarding of contract
SSEN Project Environmental Manager	Lorna Wilkie M: [Redacted] E: [Redacted]
SHE (Safety Health Environment) Manager	Paul Webster M: [Redacted] E: [Redacted]
SSEN 30 Minute Reporting Line	0800 096 621
SEPA Emergency Environmental Event Contact Number	0800 80 70 60

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SEPA Flood Line	0345 988 1188
Scottish Water	0345 988 1188
NatureScot	Great Glen House Leachkin Road Inverness IV3 8NW T: 01463 725 000
Argyll and Bute Council	Argyll and Bute Council, Kilmory, Lochgilphead, Argyll, PA31 8RT T: 01546 605522

10 Reinstatement

The appointed contractor shall reinstate all working areas as a result of the works or access across land to the reasonable satisfaction of the landowner/occupier and SSEN.

11 Bad Weather

It is important to consider the implications of poor weather conditions and associated environmental risks. Bad weather, particularly heavy rain, can cause significant environmental impacts during construction (for example, on sensitive habitats and increased risk of sediment laden run-off into surface waters).

SSEN and appointed contractor will show compliance with the following:

- Identify an action plan before construction starts with a protocol of measures to implement in times of bad weather. This should include heavy rain, high winds, snow and frost; The weather forecast should be checked on a daily basis and thought should be given to possible sudden changes.
- Ground conditions should be checked regularly, and assessment made as to whether they are suitable for the proposed site activities;
- Check whether plant is causing unacceptably high damage on site because of poor ground conditions (in consultation with the ECOW).
- Consider whether plant could be at risk if used in areas which are too wet; Plan for high run-off in advance and Identify protection measures (silt traps, straw bales and booms etc).
- Check for any materials stored close to watercourses during construction activities which could be washed into the water in times of storm. During times of excessive

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rainfall and ground saturation, stripping and reinstatement works should not be undertaken.

12 Biosecurity

When working/crossing farmland or working near livestock, all personnel to ensure that boots /wheels of vehicles have been brushed with the biosecurity product (DEFRA approved disinfectant FAM-30) that will be available to all personnel on each site. Onshore activities will also be managed in accordance with Appendix A – TG-NET-ENV-521 GEMP – Biosecurity (On Land).

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Appendix A SSEN General Environmental Management Plan (GEMP)

Please refer to the following GEMPs which will be attached alongside this document.

[TG-NET-ENV-512 – Working in or Near Water](#)

[TG-NET-ENV-516 – Waste Management](#)

[TG-NET-ENV-515 - Watercourse Crossings](#)

[TG-NET-ENV-510 – Oil Storage and Refuelling](#)

[TG-NET-ENV-513 – Working in Sensitive Habitats](#)

[TG-NET-ENV-517 – Contaminated Land](#)

[TG-NET-ENV-511 – Soil Management](#)

[TG-NET-ENV-521 – Biosecurity\(On Land\)](#)

Appendix B Otter Species Protection Plan

Please refer to the following for SSEN’s Otter Species Protection Plan which will be attached alongside this document.

[TG-NET-ENV-503 Otter Species Protection Plan](#)

Appendix C Bird Species Protection Plan

Please refer to the following for SSEN’s Bird Species Protection Plan which will be attached alongside this document.

[TG-NET-ENV-505 Bird Species Protection Plan](#)

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Appendix D Proposed Access Route

The following figures highlight the proposed site access. This access route is indicative and will require appropriate consents from existing land owners prior to commencement of works.



Figure 5 – Indicative Access Route From Existing Estate Following Private Access Track



Figure 6 – Indicative Access Route Following Access Track onto Mull Shore End

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Figure 7 – Indicative Access Route Following Existing Access Track



Figure 8 – Indicative Access Route Accessing Mull Shore End and Avoiding Sensitive Features