Chapter 13 - Schedule of Environmental Commitments

Neven Point Pier EIA Report

Neven Point Wind Limited

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13.0 Schedule of Environmental Commitments

13.1 Introduction

13.1 Best practice in EIA recommends the use of a Schedule of Environmental Commitments, which can act as a quick reference for anyone interested in the mitigation measures to which the Applicant has committed to implementing and upon which the assessment of residual effects presented in this EIA Report has been based. It will be utilised by the Applicant's design team throughout development of the detailed design, and the appointed Contractors will be required to allow for, and ultimately implement, each of the measures in this schedule as a minimum.

13.2 **Table 13.1** presents a draft Schedule of Environmental Commitments for the Proposed Development, listed according to the relevant environmental topic area.

Table 13-1 Draft Schedule of Commitments

Environmental Subject Area	Environmental Commitments	Timing
Light Nuisance	Construction lighting will be minimised and directional to minimise light spillage, glare, impacts on sensitive views and ecological receptors.	Pre-Construction, Construction
Construction Hours	The estimated on-site construction period for the Proposed Development is approximately 17 weeks, and 18 to 24 months for the wider project and includes a programme to reinstate all temporary working areas. Normal construction hours would be 07:00 to 19:00 weekdays and 07:00 to 13:00 Saturdays. Unless otherwise agreed, there would be no working on Sundays or bank holidays. Critical activities such as component delivery or pouring of concrete may take place outside these hours. If required, additional working hours would be agreed in consultation with OIC's Environmental Health Officer. These times have been chosen to minimise disturbance to local residents and if required to be controlled this would be agreed with OIC via an appropriately worded condition. Details of the construction programme would be provided to OIC in the CEMP prior to the commencement of construction and secured via an appropriately worded condition.	Pre-Construction, Construction
Construction Compound	There will be construction compound at the landing point site. The construction compound located within the wind farm site will also be utilised for equipment, plant and materials storage for the landing point.	Pre-Construction, Construction
Construction traffic	Traffic between the wind farm and landing point has been assessed as part of the wind farm EIA, and will subsequently be managed under the CTMP for the wind farm. A finalised CTMP and CEMP to be agreed with OIC prior to commencement of construction. The applicant also intends to consult with the local community directly on the CTMP in parallel with OIC, to ensure that for all residents along the route to the wind farm site (for approximately 8 dwellings) , that access and travel are not impeded, site-specific circumstances will be considered in each case. Any potential disruption will be planned around each of their needs. The Applicant would ensure that construction/maintenance vehicles would be routed in agreement with OIC, to minimise disruption and disturbance to local residents. To avoid impacts on the scheduled ferries, no abnormal loads would be moved within 30 minutes of a ferry arrival or departure. This would allow unimpeded access to the ferry terminal for other road users. In addition, bulk	Pre-Construction, Construction

Environmental Subject Area	Environmental Commitments	Timing
	materials (concrete aggregate, cement, cabling sand, etc) transported to Eday would not utilise the existing scheduled ferries where possible, with the proposed new landing point utilised for AIL and bulk item deliveries.	
Construction Environmental Management Plan (CEMP)	The Applicant / Approved Marine Contractor would produce, and adhere to, a CEMP. The Applicant shall amend and update the CEMP throughout the construction period, where it is necessary to ensure compliance with any conditions or to accommodate any new constraints as a result of interaction and reasonable feedback from potential receptors. The CEMP shall describe how the Applicant would ensure suitable management of environmental issues during construction of the Proposed Development, as noted in, but not necessarily limited to, the list below: • noise; • dust and air pollution; • surface and ground water; • marine environment and coastal waters; • marine ecology (including protection of marine and intertidal habitats and species); • cultural heritage; • 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). Prior to commencement of construction activities, a pollution prevention strategy, contained within a CEMP, will be agreed with SEPA to ensure that appropriate measures are put in place to protect watercourses and the surrounding environment.	Pre-Construction, Construction
Decommissioning	During decommissioning, vehicles would access the Site by the same routes used for delivery and construction. The temporary construction compound at the wind farm site would be re-established or a new construction compound would be developed as agreed	Decommissioning

Environmental Subject Area	Environmental Commitments	Timing
	with OIC at the appropriate time, to temporarily store decommissioned plant and equipment. All components would be removed from the Site for disposal and/or recycling as appropriate and in accordance with regulations in place at that time. Hardstanding would be removed and land/intertidal area returned to pre-construction state. The CEMP would be updated prior to decommissioning by the Principal Contractor to reflect current legislation and policy and would be agreed with OIC, OIC-Marine Services, NatureScot, SEPA and Historic Environment Scotland.	
Water Environment – Oil, Fuel, Site Vehicle Use and Storage	The risk of oil contamination will be minimised by good site working practice (further described below) but should a higher risk of oil contamination be identified then installation of an oil separator will be considered. The storage of oil is considered a Controlled Activity which will be deemed to be authorised if it complies with the Regulations. The mitigation measures to minimise any risk of contaminant release are in line with SEPA GPP documents and include the following: **Storage:** • Storage for oil and fuels on site will be designed to be compliant with GPP2 and GPP8; • The storage and use of loose drums of fuel on site will not be permitted; and • Bunded tanks will provide storage of at least 110% of the tank's maximum capacity. • Any fuel or oil held on-site would only be of an amount sufficient for the plant required. • There would be no long-term storage of lubricants or petrochemical products on-site at the Proposed Development. **Refuelling and maintenance:**	Pre-Construction, Construction

Environmental Subject Area	Environmental Commitments	Timing
	• Fuelling and maintenance of vehicles and machinery, and cleaning of tools, will be carried out in a designated area where possible in line with GPP13; • Multiple spill kits will be kept on site; • Drip trays will be used while refuelling; • Regular inspection and maintenance of vehicles, tanks and bunds will be undertaken; As an emergency procedure the Pollution Incident Response Plan will include measures to deal with accidental spillages.	
Water Environment – Oil, Fuel, Site Vehicle Use and Storage	All activities above Mean High Water Springs (MHWS) with potential to affect the water environment require to be authorised under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). The level of authorisation required is dependent on the anticipated environmental risk posed by the activity to be carried out. These activities could include construction drainage. Construction activities below MHWS with potential to affect the water environment require to be authorised under a Marine Licence.	Pre-Construction, Construction
Water Environment – Sediment Mitigation	The marine landing point will be infilled with clean (screened) inert rock and will be stabilised with a geotextile membrane and rock armour. Prior to formation of the outer bund, a silt boom / curtain will be moored seaward of the development and will be in place to capture migration of any fine sediment generated during the infilling and construction process. A banksman will be present to review any sediment or material movement during construction. Any additional mitigation measures will be recommended such as required due to changing weather or changes in wave and tidal conditions. A suitably qualified Environmental Clerk of Works (EnvCoW) will also monitor the construction works to ensure that the CEMP and associated mitigation measures are being implemented effectively.	Pre-Construction, Construction

Environmental Subject Area	Environmental Commitments	Timing
	It is recommended that inert rocks could be wetted at source of procurement (i.e. quarry, aggregate handling depot prior to transportation) prior to infilling works to avoid generation of dust into the coastal waters.	
Water Environment – Concrete Management	No concrete batching is proposed to be undertaken on site (at marine interface or in proximity). Concrete batching will instead be undertaken at the wind farm construction compound, prior to pouring. The following mitigation is proposed for concrete handling and placement: Pouring of concrete will take place within well shuttered pours to prevent egress of concrete from the pour area. Pouring of concrete during adverse weather conditions (i.e. high rainfall etc) will be avoided. A visqueen membrane would be placed ahead to contain/prevent the spread of any material to surrounding tidal areas. The CEMP will include a Pollution Incident Response Plan, and drivers of vehicles carrying concrete will be fully informed and supervised to ensure awareness of potential effects of concrete and of the procedures for clean-up of any accidental spills. Concrete acidity (pH) will be as close to neutral (or site-specific pH) as practicable as a further precaution against spills or leakage. The concrete acidity for the site will be confirmed post-consent with the principal contractor involvement and detailed in the relevant CEMP.	Pre-Construction, Construction
Water Environment – Drainage	A detailed drainage design would be developed and provided to SEPA and OIC for approval prior to construction. The surface water drainage will be designed to ensure that there are no untreated surface water discharges directly to surrounding coastal waters. It is proposed to replicate natural drainage and to use source control to deal with rainwater in proximity to where it hits the ground in line with current Sustainable Drainage Systems (SuDS) guidance.	Pre-Construction, Construction
Water Environment -	The CEMP will include for surface water management and pollution prevention measures (e.g. Pollution Prevention Plan),to be in place during construction and operation. The CEMP will remain a live document and will	Pre-Construction, Construction, Decommissioning

Environmental Subject Area	Environmental Commitments	Timing
Surface Water Management / Pollution Prevention	be continually updated as the work progresses in light of any unforeseeable or emerging matters that require to be addressed. The CEMP is a practical tool to facilitate the management of environmental mitigation measures and to provide a clear roadmap of the key roles and responsibilities during construction. A CEMP will be provided by the marine contractor and approved by OIC and OIC Marine Services as the Statutory Harbour Authority, prior to the commencement of construction works. A suitably qualified Environmental Clerk of Works (EnvCoW) will monitor the construction works to ensure that the CEMP and associated mitigation measures are being implemented effectively. Best practice will be adopted throughout all phases of development, following current guidance. The programme of works will be planned, monitored and managed to minimise the potential negative environmental impacts. The detailed Construction Method Statement will be provided by the Approved Contractor and will outline the final order of construction works.	
Marine Ecology - Pre-Construction, Additional Surveys	Benthic habitat surveys will be undertaken within the vicinity of the Proposed Development, and particularly the proposed anchor locations, to inform micro-siting of anchor placement and avoidance of key habitats (there is potential for maerl beds to be present at c.400m from the Proposed Development). Refer to **Chapter 8: Marine Ecology** for further detail.	Pre-Construction
Marine Ecology – Pre-Construction, Additional Surveys	Otter monitoring will be undertaken for up to a year in advance of construction, with a focus on the resting site to be potentially disturbed as a result of abutment/alignment along west extent of the Proposed Development. The intent of this is to fully inform updates to the Outline SPP for Otter, and any additional mitigation required, as detailed fully in **Appendix 8.5: Outline Otter Species Protection Plan (SPP).**	Pre-Construction, Construction
Marine Ecology – General	In order to mitigate for potential impacts relating to pollution, adherence to standard best practice working methods set out in the CEMP, including	Pre-Construction, Construction

Environmental Subject Area	Environmental Commitments	Timing
	specific cognisance of the following relevant good practice guidelines (GPPs); • GPP 5: Works and maintenance in or near water; • GPP 6: Working at construction and demolition sites; • PPG 7: Safe Storage – The safe operation of refuelling facilities; • GPP 21: Pollution and incident response planning; and • GPP 22: Dealing with spills. All personnel on the site will be made aware of the environmental sensitivities of the site via the site induction and additional task specific toolbox talks as required. Where possible construction activities will be confined to daylight hours to reduce disturbance to commuting and foraging fauna within the locale. Any artificial light required during construction will be fitted with shades and directed at the required work area only.	
Marine Ecology – Otter	Mitigation for otter is detailed fully **in Volume 4, Appendix 8.5: Outline Otter Species Protection Plan (SPP)** of this EIA Report and summarised below: • A pre-works survey should be undertaken immediately prior to construction (this is above and beyond the additional surveys described in Paragraph 8.10.2) to ensure the baseline remains valid. • An ECoW should oversee any works that will obstruct or potentially damage the resting site under the existing Eday pier. • Any works to the resting site are considered highly likely to require a derogation licence from NatureScot, inclusive of an otter SPP. • Preliminary measures and suggested/content and format are provided in the **Appendix 8.5**, but this should be considered a live document to be updated as necessary following further survey and confirmation of use of the resting site.	Pre-Construction, Construction

Environmental Subject Area	Environmental Commitments	Timing
	• Any works causing high levels of noise or human activity should be limited to daylight hours to reduce disturbance to otter activity as they are likely to concentrate foraging and commuting activities around dawn and dusk. • Any excavations created during works should not be left open for otter or other mammals to become trapped. Appropriate covers should be fitted at the end of every working day. At the very least, a shallow sloping edge or some form of ramp should be placed in the excavations to allow any animals to climb out. • All rubbish and materials will be collected and removed from site on a regular basis to prevent trapping or injury of any wildlife. • Embedded mitigation regarding lighting should be adhered to. Permanent lighting installed should be of the warm white spectrum (ideally <2700 Kelvin) the adjacent shoreline to reduce disturbance to resting, commuting and foraging otter. • Vehicular access into and out of the site must be made slow and cognisant of the possibility of striking an otter with a vehicle. A maximum speed limit of 15 mph is suggested. • If an otter is noticed in the works areas, works should stop immediately and the ECoW informed.	
Marine Ecology and Biodiversity – Ornithology	An Ornithology SPP should be produced, to be included in the CEMP. A suitably experienced ornithologist will be deployed at the landing point, and/or on vessels, during the breeding period to monitor for the presence and any observed reactions of birds, and specifically breeding Red-throated	Construction

Environmental Subject Area	Environmental Commitments	Timing
	Divers, in the vicinity of the Proposed Development. A policy of adaptive management should be considered across the areas where works were undertaken, with consideration given to the consequences of failure. Ornithology surveys should be conducted at the landing point, and along the vessel route, a minimum of a full year in advance of construction and should cover both the breeding and non-breeding periods. This will be to establish a baseline regarding bird use of the landing point to determine efficacy of mitigation during construction monitoring by the ornithology (as described in the paragraph above). If the baseline unexpectedly indicates use to the contrary of the assumptions made within this Chapter, identification of additional mitigation requirements may be required to avoid disturbance to birds, to be reflected in the Ornithology SPP.	
Marine Ecology – Marine Mammals and Basking Shark	A Marine Mammal and Basking Shark SPP will be produced as an Appendix to the CEMP.	Construction
Marine Ecology – Marine Mammals, Basking Sharks and Vessels	A Vessel Management Plan (VMP) will be produced detailing vessel routes, number of movements (both related to construction and operation) between sites to minimise and avoid, where possible, disturbance and injury/mortality related impacts to marine mammals and fish in particular. Consideration of implementation of an appropriate and strict speed limit for marine traffic associated with both construction and operation of the proposed development.	Pre-Construction, Construction
Marine Ecology – Fish	Should dry working areas be required, or use of an intake pump to remove water, this should be screened to prevent fish from being injured. Where appropriate, measures should be implemented for any fish rescue within the confines of any dry working areas. The ECoW or MMO should monitor any fish deaths as a result of potential pollution events, and report these to NatureScot and Marine Directorate (number of fish and species). Consideration should be given to mitigation strategies to reduce fish mortality if it becomes an issue.	Pre-Construction, Construction

Environmental Subject Area	Environmental Commitments	Timing
Marine Ecology and Biodiversity – Spread of mINNS	The principal contractor will produce and implement a robust biosecurity plan throughout the duration of works. This will include a check clean and dry protocol (as per Non-Native Species Secretariat, No Date) for equipment and plant machinery, as appropriate, prior to deployment and at regular intervals throughout construction and operation to reduce risk of transmitting non-native and invasive species. The plan will be submitted to the planning authority and other relevant consultees for approval prior to works commencing, and implementation would be audited by the ECoW. The following guidance documents and resources will be used to produce the biosecurity plan, as recommended by NatureScot during consultation: • Guidance for Producing Site and Operation-Based Plans for Preventing the Introduction of Non-Native Species (Payne et al., 2014); • NatureScot Commissioned report 748; Marine biosecurity planning – Identification of best practice: A review (Cook et al., 2014); • Ballast Water Management (BWM) guidelines (International Marine Organisation, 2025); • Guidelines for the control and management of ships' biofouling to minimise the transfer of invasive aquatic species (International Marine Organisation, 2023); and • Ballast Water Management Policy for Scapa Flow (OIC, 2023). Any mINNS presence data should be shared with OIC, NatureScot and Marine Directorate. Thought it should be noted that Eday pier is part of the ongoing mINNS monitoring undertaken by OIC which is anticipated to continue through the lifetime of the Proposed Development.	Pre-Construction, Construction, Decommissioning
Ecology and Biodiversity – Enhancements	It is intended that a detailed Biodiversity and Enhancement Management Plan (BEMP) is produced, in consultation with OIC, NatureScot and other relevant stakeholders. The BEMP should be informed by a site visit by an appropriately experienced ecologist to gather baseline data regarding the habitats on site, and the suitability of the potential measures proposed. It is not intention at this stage to provide full details of proposed enhancement measures, many of which cannot be determined fully at this	Pre-Construction, Construction, Post-Construction

Environmental Subject Area	Environmental Commitments	Timing
	stage, though Neven Point Wind Ltd are committed to delivering meaningful enhancements for biodiversity. The securing, by Neven Point Wind Ltd, of an area of land at Stackald (immediately south and east of the Proposed Development), which was confirmed at a later stage of the development of this EIA Report, presents additional opportunities for biodiversity enhancements. High-level opportunities identified at this stage are described below and are detailed fully in **Section 8.12, Chapter 8: Marine Ecology and Biodiversity** of this EIA Report. It should be noted that is not anticipated that all of these are required to deliver an overall biodiversity enhancement for the project, especially in cognisance of its limited footprint. **Grassland Enhancement** Given the current nature of the grassland at the land at Stackald (primarily heavily grazed pastoral fields), it is possible that even simple measures such as fencing an area of this off to remove grazing pressures and allowing natural regeneration of vegetation alongside potential sowing of suitable grassland and/or wildflower seed mixes. This would have associated benefits for invertebrates and pollinators, which in turn serve as a prey species for other insects, birds and small mammals. Enhancing the grassland at Stackald may require the area being scarified then over-sown with an appropriate seed mix, which may include neutral grassland or coastal grassland mixes. The appropriate seed mix would be identified following a site visit and establishment of baseline habitat present and their condition. Many of such seed mixes will contain yellow rattle (*Rhinanthus minor*). However, if it isn't in the selected mix then it should be sown separately as it is parasitic to grasses, it helps reduce their vigour and facilitates the growth of other wildflowers. Cognisance needs to be given to flowering plants which are appropriate to the site-specific conditions. Sowing instructions of selected mixes should be followed, and is likely to be best done during the autumn, especially for yellow rattle.	

Environmental Subject Area	Environmental Commitments	Timing
	To encourage both species and structural diversity, an appropriate mowing regime should be implemented, potentially along the lines of the below: • One cut should take place in late summer from August – September. Cutting can be carried out by a standard ride on or push mower. For a push mower, strimming of the grass may be required first if the growth is too tall. • The grass cuttings should be removed from the site within 2 weeks of cutting to prevent soil improvement via reabsorption of nutrients and to avoid smothering new growth. The cuttings can either be removed at the time of mowing, by using a mower with a grass collection attachment, or raked up and removed after mowing. • Low cutting heights should be avoided with a minimum grass height of 10cm being maintained at all times. • Mowing should be avoided immediately after, or during, wet conditions to prevent machinery causing rutting and/or soil compaction. • If taller, rank grasses are present utilise a two-cut regime, with an additional cut, either in spring, before the start of May, or a second cut in autumn (September-October). • Small patches (c.10-20%) of the site should be left unmown each year on rotation to ensure that some long vegetation is retained to provide cover for small mammals, birds and invertebrates, which may utilise the site. Maintaining some areas of bare ground will aid in the future establishment of wildflowers and can be of benefit to invertebrates. This can be achieved through localised scarification with a rake or scalping with machinery (e.g. a strimmer). In addition, insect shelters could be incorporated into the grassland, in the form of rock piles, deadwood piles and/or ‘bug hotels’ which contain a range of features for sheltering and nesting insects. There are a variety of bug hotel designs, these could be freestanding or mounted on small posts within the enhanced grassland.	

Environmental Subject Area	Environmental Commitments	Timing
	Provision of Nesting/Resting Resources for Fauna House Sparrow (*Passer domesticus*), Starling (*Sturnus vulgaris*) and Swift (*Apus apus*) are all BoCC red listed species which were identified during the desk study to be potentially present within the locale. The enhancement of grassland for invertebrates as describe above, will provide additional foraging resource for these species. Additional breeding habitat can be provided via nest boxes which can be affixed to any of the buildings within land purchased by the applicant at Stackald, should they be retained. Suitable boxes include: • 1SP Schwegler Sparrow Terrace • Vivara Pro WoodStone Starling Nest Box • Vivara Pro Woodstone Swift Nest Box Considering the high levels of use by otter of the Eday coast, but relative absence of suitable resting sites for holt creation, an artificial otter holt could be created to provide this resource. Key considerations for the creation of an artificial holt include placement in an undisturbed area, free from flooding and close to a good food supply, as far away from roads as possible. Artificial holts can be a structure of pipes that will create tunnels for the otter, or it can be as simple as a log pile with ample entrance points leading the otter to a cavity. **Intertidal Habitats** Habitat features could be created within the rock armour of the landing point, to maximise ecological niches. The exact prescriptions required to achieve this depends somewhat on the finalised design and engineering requirements for the landing point and so will need to be developed with the chosen contractor. Diversity of habitats within rock armour can be achieved passively through careful selection and placement of boulders to create ledges and pools or actively through introduction of features such as ridged concrete tiles which are designed to mimic natural rock features which have both been shown to have positive effects on biodiversity (MacArthur et al., 2020; Vozzo et al., 2021). Eco-blocks are pre-cast artificial structures that feature a range of textured surfaces, holes and depressions and are made of materials (generally	

Environmental Subject Area	Environmental Commitments	Timing
	concrete) to which marine plants and animals can attach and become established over time. They are designed to replicate rocky habitats and various manufacturers have begun to provide eco-blocks for developments with design feature specifications ranging from simple blocks with rough textures and grooves and shallow rock pools to more complex blocks that have deep cavities or holes. The manufacture of eco-blocks has evolved to use recycled plastic free materials such as low-carbon concrete mixes that use waste products from industrial processes and the inclusion of shell material to encourage attachment of particular species (Potet et al., 2021). Various case studies (Firth et al. 2013 and 2014) have shown success with dedicated pre-cast eco-engineering blocks which were found to support a higher diversity of species across the various micro habitats, while adjacent boulders supported only four species. **Wider Opportunities in Orkney** Financial contributions could be made to existing co-ordinated marine enhancement programmes in the wider Orkney area, through liaison directly with Orkney to identify suitable schemes, or wider organisation such as the Scottish Marine Environmental Enhancement Fund (SMEEF). Example local projects and organisations which may benefit, and relate directly to Orkney, include: • Orkney Skate Trust • Project Seagrass • Orkney Native Wildlife Project	
Seascape, Landscape and Visual	Embedded mitigation proposals are those mitigation measures that are inherent to the Proposed Development. Key embedded mitigation measures related to landscape and visual comprise: • Siting of the proposed marine landing point in close proximity to the existing Eday Ferry Terminal. This would limit the extent of landscape and visual change to within a coastal area already affected by similar development, avoiding fragmentation of the more intact coastline qualities.	Embedded

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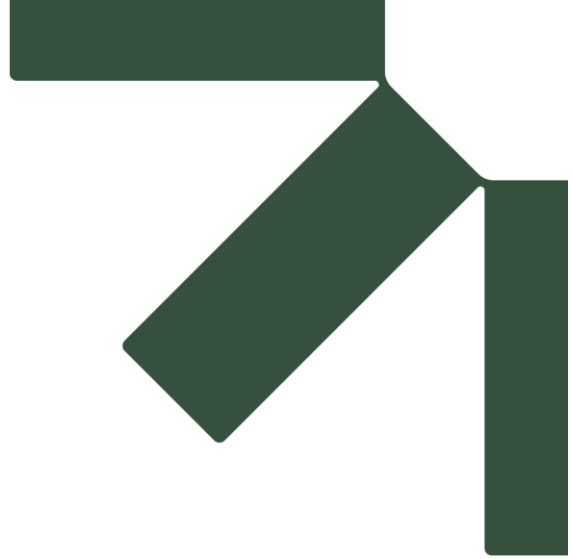
	• The construction methods limit the scale and durations of works within the sea, and most land reclamation activities would be accessed on land. • Once the temporary floating pier/transfer barge is no longer required, it will be demobilised, leaving only the permanent causeway and no additional infrastructure protruding into the sea, which would limit the appearance of infrastructure in views. No additional mitigation is proposed - all landscape and visual mitigation measures are embedded in the design.	
Marine Archaeology and Cultural Heritage – Impacts on Known Assets	The sole known heritage asset within the site comprises the existing Backaland pier (Asset 3), under modern superstructure and currently in use as the Eday pier and ferry point. It is considered unlikely that this will be substantially impacted upon during construction, if at all. Any works to facilitate construction of the Proposed Development that would require directly impacting upon the pier structure may require archaeological monitoring. Direct impacts upon hitherto unknown heritage assets cannot entirely be discounted and a programme of archaeological monitoring for onshore ground-breaking works may also be required. Any such works would need to be agreed upon prior to construction and through consultation with Orkney Islands Council Archaeologist.	Pre-Construction Construction
Marine Archaeology and Cultural Heritage – Impacts on Known Assets	Mitigation may be needed in order to assess the potential for the presence of hitherto unknown heritage assets within the marine area of the site. However the design of any mitigation will require further consultation with Orkney Islands Council and may involve the use of a sub-contractor in order to conduct the works.	Pre-Construction, Construction
Noise – Best Practicable Means	No significant effects are anticipated to occur, as such no mitigation is required, subject to the adoption of the embedded Best Practicable Means outlined below. A range of environmental measures have been embedded into the construction methodology for the Proposed Development in accordance with	Construction, Decommissioning

Environmental Subject Area	Environmental Commitments	Timing
	the principles of Best Practicable Means (BPM), as defined under Section 72 of the CoPA. These include: • Selection of low-noise plant and techniques, such as electric or hybrid equipment where practicable. • The use of broadband reversing alarms in preference to tonal alarms. • Use of physical barriers or enclosures for fixed or particularly noisy equipment. • Locating static plant away from receptors, where the site layout allows. • Lowering items and materials rather than dropping them, where practicable. • Engine shutdown or standby modes for plant and vehicles when not in active use. • Regular plant maintenance to ensure efficient and quiet operation. • Clear communication with local residents, including prior notice of particularly noisy activities. • Limiting works to agreed hours, with no night-time or extended working unless otherwise approved. These measures will be detailed and implemented through the project's Construction Environmental Management Plan (CEMP), which will be provided by the approved Marine Contractor, prior to commencement of construction works, and in agreement with Orkney Islands Council. In addition, noise and other measures outlined within the CEMP for the associated wind farm will be upheld across the wider project.	
Navigation	The new marine landing point has been assessed as having a low impact on the navigational environment, and a proportionate approach has therefore been taken to assess the risks and preserve the safety of navigation. The NRA has been undertaken on the basis of expert judgement and a qualitative analysis. Provided that effective risk control measures are put in	Pre-Construction, Construction, Decommissioning

Environmental Subject Area	Environmental Commitments	Timing
	place and robust operational procedures are established, the navigation risk claim is considered to be low. The reasoning and evidence on which the claim conclusion is based are: • the navigational area experiences low vessel traffic with most vessel targets identified as local vessels; being ferries or fish farm support vessels; • the development itself does not substantially alter the water depth or seabed conditions for navigating purposes in the assessment area; • the construction area extents of marine operations will be marked with lighted buoys prior to commencement of works; • Notices to Mariners will be issued and promulgated to local fishing organisations, yacht clubs and marinas;. • only experienced marine contractors will be considered in the award of construction contracts; and • the site is located within the extents of the Orkney Harbour Authority area, and traffic monitoring measures could be covered by Orkney Harbour Authority VTS (Vessel Traffic Services). Anchoring Systems and Embedded Design Mitigation: The mooring analysis undertaken by Orcades Marine Management states: “based on the high-level concept design and approximated environmental conditions the results of the mooring analysis indicate that it is feasible for a circa 90-metre-long barge or floating pier to remain safely on this location in 30 knots of wind and 1.5 metre significant wave height imposing loads on the mooring points of less than 40 tonnes…. The estimated number of days in a year where a wind speed of greater than 25 knots may occur in the beam sector is 5 days (1.22%) and the estimated number of days in a year	

Environmental Subject Area	Environmental Commitments	Timing
	where a wind speed of greater than 25 knots may occur in all sectors is 26 days (7.06%)." The report concludes: "Based on the loads identified in this analysis, it is proposed that a mooring arrangement incorporating longer mooring lines be adopted. Additionally, the system should include a quick-release mechanism to enable the floating pier to be towed to a designated refuge area should forecasted weather conditions exceed operational limits. …. The proposed mooring components for the barge …. show that the component utilisations with the factored loads in an extreme 1 in 1 year wave state of 2 meters Hs on the starboard beam do not exceed 100% and therefore are assessed to be adequate."	
Air Quality and Dust	A full Air Quality Impact Assessment (AQIA) was undertaken to accompany the planning application for the associated wind farm. Overall mitigation measures for the wider project are recommended by technical specialists, including for extraction and construction dust mitigation, are outlined within the designated CEMP for the associated wind farm (refer to Neven Point Wind Farm EIA Report). The construction of the marine landing point is not anticipated to produce fugitive construction dust emissions from extraction or infilling – central infill will be imported directly to site by barge from outwith the island, with potential for a minimum volume (extracted from the borrow pit at the wind farm) to be transported via the established HGV route to the marine landing point. The air quality and dust mitigation measures recommended for the associated wind farm will be upheld for the construction of the landing point, and will also apply to the transportation of infill or aggregate from the landing point site to the wind farm site, and reciprocally. Upon appointment of the marine contractor for construction of the landing point, dust suppression and containment will be maintained and included within a separate CEMP. The CEMP for the landing point will also be submitted by the contractor to the local authority (and the harbour authority) for approval prior to the commencement of any works.	Construction, Decommissioning



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