



APPENDIX 4-6

DECOMMISSIONING PLAN



Decommissioning Plan

Proposed Knockshanvo Wind Farm, Co. Clare







Client: FuturEnergy Knockshanvo Designated

Activity Company

Project Title: Proposed Knockshanvo Wind Farm, Co.

Clare

Project Number: 200513

Document Title: **Decommissioning Plan**

Document File Name: **Decommissioning Plan F - 2024.06.21 -**

200513

Prepared By: MKO

Tuam Road Galway Ireland H91 VW84



Rev	Status	Date	Author(s)	Approved By
01	Final	2024.06.21	EOS	MW



Table of Contents

1.	INTRODUCTION	1
	1.1 Scope of the Decommissioning Plan	1
2.	SITE AND PROJECT DETAILS	3
	2.1 Site Location and Description	5 7 7 7 7
3.	ENVIRONMENTAL MANAGEMENT	9
	3.1 Site Drainage	9
4.	EMERGENCY RESPONSE PLAN	15
	4.1 Emergency Response Procedure	
5.	PROGRAMME OF WORKS	21
	5.1 Decommissioning Schedule	21
6.	MITIGATION PROPOSALS	22
7.	MONITORING PROPOSALS	28
8.	COMPLIANCE AND REVIEW	31
	8.1 Site Inspections and Environmental Audits	31 31 32



INTRODUCTION

This Decommissioning Plan has been prepared by MKO on behalf of FuturEnergy Knockshanvo Designated Activity Company (the Applicant) for the decommissioning of the Proposed Development.

This report provides the environmental management framework to be adhered to during the decommissioning phase of the Proposed Development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur.

Scope of the Decommissioning Plan

This report is presented as a plan for the decommissioning of the Proposed Development.

- Where the 'Proposed Development' is referred to, this relates to all the project components described in detail in Chapter 4 of this EIAR i.e. Wind Farm Site and Grid Connection as detailed below.
- Where 'the Site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of Chapter 1. Generally, the study area extends beyond the planning application site boundary depending on the requirements of individual assessments. Individual topics for assessment purposes, i.e., each chapter, will indicate the study area used for that topic. The planning application red line boundary occupies a smaller area within the primary EIAR Site Boundary. The EIAR Site Boundary represents the primary area of study and not necessarily areas where proposed works will occur as part of the Proposed Development.
- Where the 'Wind Farm Site' is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, junction accommodation works, access roads, temporary construction compounds, 110kV electrical substation, underground cabling, borrow pits, site drainage, tree felling and all ancillary works.
- Where 'Grid Connection' is referred to, this refers to the underground 110kV electrical cabling and all associated site development works connecting the Wind Farm Site to the existing Ardnacrusha 110kV electrical substation.

The report is divided into seven sections, as outlined below:

Section 1 provides a brief introduction as to the scope of the report.

Section 2 outlines the Site and Project details, detailing the targets and objectives of this plan along with providing an overview of works methodologies that will be adopted throughout decommissioning.

Section 3 sets out details of the environmental controls to be implemented on site including the mechanisms for implementation. A waste management plan is also included in this section.

Section 4 outlines the Emergency Response Procedure to be adopted in the event of an emergency in terms of site health and safety and environmental protection.

Section 5 sets out a programme for the timing of the works.

Section 6 consists of a summary table of all mitigation measures to be adhered to during the decommissioning phase.

1



Section 7 consists of a summary table of all monitoring measures to be adhered to during the decommissioning phase.

 $\textbf{Section 8} \ \text{outlines the proposals for reviewing compliance with the provisions of this report.}$



2 SITE AND PROJECT DETAILS

2.1 Site Location and Description

The Wind Farm Site is located approximately 3 km south of Broadford, 3.5 km southeast from Kilkishen, and 4 km northeast from Sixmilebridge, Co. Clare. The Grid Reference co-ordinates for the approximate centre of the site are E554266 N669733. The site is accessed via local roads from the R465 Regional Road, which travels in a north-south direction between Broadford and Ardnacrusha, the R471 Regional Road which travels east-west between Sixmilebridge and Clonlara and the Crag Local Road, which travels in a northeast-southwest direction between Sixmilebridge and Broadford. The Wind Farm Site itself is served by a number of existing forestry roads.

Current land-use on the Wind Farm Site comprises coniferous forestry, biodiversity areas under Coillte management and third party lands currently being used for agriculture and forestry. Current land-use along the Grid Connection comprises of public road corridor and coniferous forestry. Land-use in the wider landscape comprises a mix of agriculture, low density residential and commercial forestry.

The Grid Connection includes for underground 110kV electrical cabling from the proposed onsite 110kV electrical substation within the Wind Farm Site to the Ardnacrusha 110kV electrical substation in the townlands of Castlebank and Ballykeelaun, County Clare. The underground cable route measures approximately 9.2 km in length, located within existing forestry tracks and the public road corridor.

Description of the Development

The Wind Farm planning application will consist of the provision of the following:

- i. Construction of 9 no. wind turbines with a blade tip height range from 179.5m to 185m inclusive, a hub height range from 102.5m to 110.5m inclusive and a rotor diameter range from 149m to 163m inclusive with associated foundations, hard-standing and assembly areas.
- ii. Construction of 1 no. permanent 110 kV electrical substation including 2 no. control buildings lightening protection, welfare facilities, car parking, and all associated electrical plant and apparatus, security fencing, external lighting, underground cabling, wastewater holding tank and all associated infrastructure, apparatus and landscaping;
- iii. Underground electrical cabling (33kV) and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;
- iv. Erection of 1 no. Meteorological Mast of 105 metres above existing ground level for the measuring of meteorological conditions, including a lightning rod which will extend above the mast;
- v. Construction of new permanent access roads and upgrade of existing roads to provide access within the site and to connect the wind turbines and associated infrastructure;
- vi. Construction of 1 no. new permanent access to the site off the R465 regional road to serve as the sole entrance to the wind farm during its operational phase and to facilitate the delivery of the construction materials and turbine components to site during the construction, operational and decommissioning phases;
- vii. Construction of 2 no. new permanent access points off the L-3042 and L-30144-0 local roads to facilitate traffic movement across the site during construction, operation and decommissioning phases. Both accesses will be gated and opened when required during the operational phase;
- viii. Development of 5 no. borrow pits;



- ix. Construction of 3 no. temporary construction compounds and associated ancillary infrastructure including temporary site offices, staff facilities and car-parking areas, all to be removed at end of construction phase;
- x. Temporary works at 3 no. locations along the R465 regional road associated with the facilitation of turbine component and abnormal load delivery to site. These works will primarily include the trimming of vegetation and strengthening of road verges;
- xi. Installation of a temporary transition compound to facilitate turbine blade delivery during the construction phase, within the townland of Court, Co. Limerick. The works will include installation of a temporary stone hard standing area and associated entrance and egress to and from the N69 national road and will be removed at the end of the construction phase.
- xii. Permanent amenity works comprising the construction of 1 no. new marked trail, the development of 2 no. new viewing areas and upgrade to 1 no. existing viewing area, including the installation of associated signage and seating;
- xiii. Permanent and temporary Site Drainage;
- xiv. Operational Stage Site Signage;
- xv. Ancillary forestry felling to facilitate construction and operation of the proposed development;
- xvi. Biodiversity enhancement measures including the permanent clear-felling of land, and;
- xvii. All related site works and ancillary development including landscaping considered necessary to facilitate the proposed development.

The Grid Connection planning application will consist of the provision of the following:

- i. The provision of underground electrical cabling (110kV) from the proposed Knockshanvo Wind Farm development to the existing Ardnacrusha 110kV electrical substation to facilitate the connection to the national grid;
- ii. Provision of 14 joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;
- iii. Permanent and temporary Site Drainage;
- iv. Ancillary forestry felling to facilitate construction and operation of the proposed development;
- v. Reinstatement of land, road and track surface above the proposed cabling trench;
- vi. All related site works and ancillary development considered necessary to facilitate the proposed development.

The site layout showing individual elements of the Proposed Development is shown in Figure 2-1. As construction is completed, elements of the project that have been developed as a temporary facilitator will either be removed, restored to its original condition, or will naturally revegetate. These include temporary construction compounds, transport route accommodation works and temporary transition compound. All access roads and hardstanding areas form part of a site roadway network which will be left in situ for future use. It is intended that decommissioning will remove all above ground components and underground cabling from the Site, and reinstate areas where infrastructure is removed. The following elements are included:

- Wind turbines and meteorological mast dismantling and removal off site;
- Wind Farm Site underground cabling removal (ducting left in-situ); and
- Turbine foundation backfilling following dismantling and removal of wind turbines (any excavated material, will be re-instated / foundations that protrude above ground level will be backfilled with
- 1 -underground reinforced concrete remaining in-situ).



Targets and Objectives

The decommissioning phase works will be completed to approved standards, which include specified materials, standards, specifications and codes of practice. This Decommissioning Plan has considered environmental issues and this is enhanced by the works proposals as part of decommissioning.

The key site targets are as follows:

- Ensure decommissioning works and activities are completed in accordance with mitigation and best practice approach presented in the accompanying Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and associated planning documentation.
- Ensure decommissioning works and activities have minimal impact/disturbance to local landowners and the local community.
- Ensure decommissioning works and activities have minimal impact on the natural environment.
- Adopt a sustainable approach to decommissioning; and,
- Provide adequate environmental training and awareness for all project personnel.

The key site objectives are as follows:

- Using recycled materials, if possible, e.g. soil and overburden material for backfilling and reinstatement.
- Ensure sustainable sources for materials supply where possible.
- Avoidance of any pollution incident or near miss as a result of working around or close to existing watercourses and have emergency measures in place.
- Avoidance of vandalism.
- Keeping all watercourses free from obstruction and debris.
- Correct implementation of the sustainable drainage system (SuDS) drainage design principles.
- Keep impact of decommissioning works to a minimum on the local environment, watercourses, and wildlife.
- Correct fuel storage and refuelling procedures to be followed.
- > Good waste management and housekeeping to be implemented.
- Air and noise pollution prevention to be implemented.
- Monitoring of the works and any adverse effects that it may have on the environment.





2.4 Decommissioning Methodologies Overview

2.4.1 Introduction

An experienced main contractor will be appointed to undertake the decommissioning of the Proposed Development. The main contractors will comply with the Construction and Environmental Management Plan (CEMP) prepared for the construction phase. An overview of the decommissioning methodologies is provided below.

2.4.2 **Decommissioning Methodology**

The proposed decommissioning methodology is summarised under the following main headings:

- Wind turbines and metrological mast.
- Turbine and metrological mast foundations.
- Underground Cabling.

2.4.2.1 Wind Turbines and Metrological Mast

Prior to any works being undertaken on the wind turbines and metrological mast, they will be disconnected from the grid by the site operator in conjunction with ESB Networks and Eirgrid. The dismantling and removal of wind turbines and metrological mast of this scale is a specialist operation which will be undertaken by the turbine supplier or competent subcontractor. Turbine and met mast dismantling will be undertaken in reverse order to the methodology employed during their construction. Cranes will be brought back to site utilising the hard stand areas that will be present after the construction phase. The dismantling of components will be bound by the same safety considerations as will be the case during construction in terms of weather conditions where works will not be undertaken during adverse weather conditions and not during high winds.

The dismantled components will likely be removed from site using the internal access roads and the same transport methodology adopted for delivery to the site initially. Transport will involve the usage of extended articulated trucks, which are detailed in Chapter 15 of the EIAR which accompanies this application. The disassembled materials will then be separated and transferred to a suitably licenced recycling or recovery facility.

The transport of disassembled turbines from the site will be undertaken in accordance with a Transport Management Plan which will be issued to and agreed with the competent authority at that time as part of a permit application for the delivery of abnormal loads using the local roads under the Road Traffic (Special Permits for Particular Vehicles) Regulations 2007. The Transport Management Plan will provide for all necessary safety measures, including a convoy and Garda escort as required, off-peak turning/reversing movements and any necessary safety controls.

2.4.2.2 Turbine and Meteorological Mast Foundations

On the dismantling of turbines and metrological mast, it is not intended to remove the concrete foundation from the ground. It is considered that its removal will be the least preferred options in terms of having potential effects on the environment as doing so could generate unnecessary environmental emissions such as noise, dust, and vibration. Therefore, the 9 no. turbine foundations and metrological mast foundation will be backfilled and covered with soil material. If there is usable soil or overburden material on the site after construction, this material will be used. The imported soil will be spread and graded over the foundation using a tracked excavator and revegetation enhanced by spreading of an appropriate seed mix to assist in revegetation and accelerate the resumption of the natural drainage management that will have existed prior to any construction.

7



2.4.2.3 Underground Cabling

The electrical and fibre optic cabling that connects each turbine to the proposed onsite $110\,\mathrm{kV}$ electrical substation will be removed from the $33\mathrm{kV}$ underground cable ducting. The onsite $110\mathrm{kV}$ electrical substation and $110\mathrm{kV}$ electrical cabling will remain in place as it will be under the ownership of the ESB and will form a permanent part of the national electricity grid. The cabling will be pulled from the cable duct using a mechanical winch which will extract the cable and re-roll it on to a cable drum. This will be undertaken at each of the joint bays/pull pits along the underground cabling route. The original pulling pits will be excavated using a mechanical excavator and will be fully re-instated once the cables are removed. The cable materials will be transferred to a suitably licenced recycling or recovery facility.

The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance for an underground element that is not visible. The site roadways along the cabling routes could be in use for purposes other than the operation of the development by the time the decommissioning of the Proposed Development is to be considered, and therefore it may be more appropriate to leave the site roads in situ for future use. It is envisaged that the roads will provide a useful means of extracting the commercial forestry crop which exists on the site, along with general agricultural use.



ENVIRONMENTAL MANAGEMENT

The following sections give an overview of the drainage design, dust and noise control measures, a waste management plan for the site and the implementation of the environmental management procedures for the site.

3.1 Site Drainage

The site drainage features for this site during its construction and operation are outlined in the EIAR and drainage plan which accompany this application. As this Decommissioning Plan is a working document and is presented as an Appendix to the EIAR, the drainage measures are not included in this document. When the final plan is prepared prior to decommissioning and presented as a standalone document, all drainage measures will be included in that document as required. The drainage proposals will be developed further prior to the commencement of decommissioning if deemed necessary. However, it should be noted that by the time decommissioning is undertaken after the planned 35-year lifespan of the Proposed Development, the areas within the site will have revegetated resulting in a resumption of the natural drainage management that will have existed prior to any construction. It is not anticipated that the decommissioning phase will interrupt this restored drainage regime in any way with the works proposed.

Refuelling; Fuel and Hazardous Materials Storage

The plant and equipment used during decommissioning will require refuelling during the works. Appropriate management of fuels will be required to ensure that incidents relating to refuelling are avoided. The following mitigation measures, which are the same as those proposed for the construction phase, are proposed to avoid release of hydrocarbons at the site:

- All plant will be inspected and certified to ensure that they are leak free and in good working order prior to uses at the Wind Farm site.
- On site re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser:
 - The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site, and will be towed around the site by a 4x4 jeep to where machinery is located.
 - The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages.
 - The fuel bowser will be parked on the level substation platform when not in use.
- Only designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.
- Fuels volumes stored on site will be minimised. Any fuel storage areas will be bunded appropriately for the fuel storage volume for the time period of the decommissioning and fitted with a storm drainage system and an appropriate oil interceptor.
- The plant used will be regularly inspected for leaks and fitness for purpose; and,
- An emergency plan for the decommissioning phase to deal with accidental spillages will be developed (refer to Section 4). Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.
- A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the decommissioning phase.



33 Dust Control

Dust can be generated from on-site activities during decommissioning such as backfilling of foundations and travelling on site roads during prolonged periods of dry weather. The extent of dust generation will depend on the type of activity undertaken, the location, the nature of the dust, i.e. soil, and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Site traffic movements also have the potential to generate dust as they travel along the haul route.

Proposed measures, which are the same as those proposed for the construction phase, to control dust include:

- Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions.
- The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the Site Manager for cleanliness and cleaned as necessary.
- Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind.
- Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods.
- The transport of material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary.
- All site related traffic will have speed restrictions on un-surfaced roads to 15 kph.
- Daily inspection of the site to examine dust measures and their effectiveness.
- When necessary, sections of the haul route will be swept using a truck mounted vacuum sweeper.

3.4 **Noise Control**

The operation of plant and machinery, including site vehicles, is a source of potential impact that will require mitigation at all locations within the site. Proposed measures to control noise include:

- Limiting the hours during which site activities likely to create high levels of noise or vibration are permitted.
- Establishing channels of communication between the contractor/developer, Local Authority and residents.
- Appointing a site representative responsible for matters relating to noise and vibration.
- Monitoring typical levels of noise and vibration during critical periods and at sensitive locations.
- Keeping the surface of the site access roads even to mitigate the potential for vibration from lorries.
- The best means practicable, including proper maintenance of plant, will be employed to minimise the noise produced by on site operations.
- All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the contract.
- Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts.
- Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All plant and equipment to be used on-site will be modern equipment and will comply with the European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations.



- Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers.
- Compressors will be attenuated models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers..
- Machines, which are used intermittently, will be shut down during those periods when they are not in use.
- Noise limits, noise control measures, hours of operation (i.e. dusk and dawn is high faunal activity time) and selection of plant items will be considered in relation to disturbance of birds.
- Training will be provided by the Site Manager to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and,
- Local areas of the haul route will be condition monitored and maintained, if necessary.

3.5 Invasive Species Management

The soil material that will be imported to site as part of the foundation backfilling will be free of any invasive species (listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011). The site manager will take steps to ensure the sourcing of suitably clean material and verify the quality of the material by having it inspected prior to bringing it to site by a suitably qualified ecologist. Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the source material used for the site reinstatement works as well as along the cable route to identify invasive species at joint bay locations where excavation to expose the cabling for removal will be required.

3.6 Traffic Management

A Traffic Management Plan will be prepared in advance of any decommissioning works. The removal of development components from site will be undertaken by a specialist haulier. The traffic management arrangements although similar to those that will be implemented for turbine delivery as outlined in the EIAR will be agreed in advance of decommissioning with the competent authority.

3.7 Waste Management

This section of the Decommissioning Plan provides a waste management plan (WMP) which outlines the best practice procedures during the decommissioning of the Proposed Development. The WMP will outline the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of decommissioning. Disposal of waste will be a last resort.

3.7.1 Legislation

The Waste Management Act 1996 and its subsequent amendments provide for measures to improve performance in relation to waste management, recycling and recovery. The Act also provides a regulatory framework for meeting higher environmental standards set out by other national and EU legislation.

The Act requires that any waste related activity has to have all necessary licenses and authorisations. It will be the duty of the Waste Manager on the site of the Project to ensure that all contractors hired to remove waste from the site have valid Waste Collection Permits. It will then be necessary to ensure that the waste is delivered to a licensed or permitted waste facility. The hired waste contractors and



subsequent receiving facilities must adhere to the conditions set out in their respective permits and authorisations.

The Department of the Environment provides a document entitled, 'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction and Demolition Projects' (2021). It is important to emphasise that no demolition will take place at this site, however, this document was referred to throughout the process of completing this WMP.

3.7.2 Waste Management Hierarchy

The waste management hierarchy sets out the most efficient way of managing waste in the following order:

Prevention and Minimisation:

The primary aim of the WMP will be to prevent and thereby reduce the amount of waste generated at each stage of the project.

Reuse of Waste:

Reusing as much of the waste generated on site as possible will reduce the quantities of waste that will have to be transported off site to recovery facilities or landfill.

Recycling of Waste:

There are several established markets available for the beneficial use of Construction and Demolition waste such as using waste concrete as fill for new roads.

At all times during the implementation of the WMP, disposal of waste to landfill will be considered only as a last resort.

3.7.3 Waste Arising from Decommissioning

The relevant components will be removed from site for re-use, recycling or waste disposal. Any structural elements that are not suitable for recycling will be disposed of in an appropriate manner. All lubrication fluids will be drained down and put aside for appropriate collection, storage, transport and disposal. Any materials which cannot be re-used or recycled will be disposed of by an appropriately licenced contractor.

The waste types arising from the decommissioning of the Proposed Development are outlined in Table 3-1 below.

Table 3-1 waste types arising during the Decommissioning Phase

Material Type	Example	EWC Code
Cables	Electrical wiring	17 04 11
	Copper, aluminium, lead and	
Metals	iron	17 04 07
Inert Materials	Crushed Stone	17 01 07
Fibreglass	Turbine blade component	10 11 03



Material Type	Example	EWC Code
	Oils and lubricants drained	
Hydrocarbons	from the turbines	13 01 01,13 02 04

3.7.3.1 **Reuse**

Many construction materials can be reused several times before they have to be disposed of:

- > Electrical wiring can be reused on similar wind energy projects
- **>** Elements of the turbine components can be reused but this will be determined by the condition that they are in.

3.7.3.2 **Recycling**

If a certain type of material cannot be reused onsite, then recycling is the most suitable option. The opportunity for recycling during decommissioning will be limited and restricted to components of the wind turbines.

All waste that is produced during the decommissioning phase including dry recyclables will be deposited in the on-site skip initially and sent for subsequent segregation at an appropriately licensed offsite facility. The anticipated volume of all waste material to be generated at the Proposed Development is low which provides the justification for adopting this method of waste management.

3.7.3.3 Implementation

3.7.3.3.1 Roles and Responsibilities

Prior to the commencement of the decommissioning, a Construction Waste Manager will be appointed by the Contractor. The Construction Waste Manager will oversee the implementation of the objectives of the plan, ensuring that all hired waste contractors have the necessary authorisations and that the waste management hierarchy is adhered to. The person nominated must have sufficient authority so that they can ensure everyone working on the decommissioning adheres to the management plan.

3.7.3.3.2 **Training**

It is important for the Construction Waste Manager to communicate effectively with colleagues in relation to the aims and objectives of the waste management plan. All employees working on site during the decommissioning phase of the project will be trained in materials management and thereby, should be able to:

- Distinguish reusable materials from those suitable for recycling.
- Ensure maximum segregation at source.
- **>** Co-operate with site manager on the best locations for stockpiling reusable materials.
- Separate materials for recovery; and
- Identify and liaise with waste contractors and waste facility operators.

3.7.3.3.3 Record Keeping

The WMP will provide systems that will enable all arisings, movements and treatments of construction waste to be recorded. This system will enable the contractor to measure and record the quantity of waste being generated. It will highlight the areas from which most waste occurs and allows the measurement of arisings against performance targets. The WMP can then be adapted with changes that are seen through record keeping.



The fully licensed waste contractor employed to remove waste from the site will be required to provide documented records for all waste dispatches leaving the site. Each record will contain the following:

- Consignment Reference Number
- Material Type(s) and EWC Code(s)
- Company Name and Address of Site of Origin
- Trade Name and Collection Permit Ref. of Waste Carrier
- Trade Name and Licence Ref. of Destination Facility
- Date and Time of Waste Dispatch
- Registration no. of Waste Carrier vehicle
- Weight of Material
- > Signature of Confirmation of Dispatch detail
- Date and Time of Waste Arrival at Destination
- Site Address of Destination Facility

3.7.3.4 Waste Management Plan Conclusion

The WMP will be properly adhered to by all staff involved in the project and will be outlined within the induction process for all site personnel. The waste hierarchy should always be employed when designing the plan to ensure that the least possible amount of waste is produced during decommissioning. Reuse of certain types of construction wastes will cut down on the cost and requirement of raw materials therefore further minimising waste levels.

This WMP has been prepared to outline the main objectives that are to be adhered to.

3.8 Environmental Management Implementation

3.8.1 Roles and Responsibilities

The Site Manager and/or Environmental Clerk of Works (ECoW) are the Project focal point relating to decommissioning-related environmental issues.

In general, the ECoW will maintain responsibility for monitoring the decommissioning works and Contractors/Sub-contractors from an environmental perspective. The ECoW will act as the regulatory interface on environmental matters. The Site Manager will be responsible for reporting to and liaising with Clare County Council and other statutory bodies as required.

The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.



4. EMERGENCY RESPONSE PLAN

An Emergency Response Plan (ERP) is presented in this section of the Decommissioning Plan. It provides details of procedures to be adopted in the event of an emergency in terms of site health and safety and environmental protection.

Emergency Response Procedure

The site ERP includes details the response required and the responsibilities of all personnel in the event of an emergency. The ERP will require updating and submissions from the contractor/ project supervisor construction stage (PSCS) and sub-contractors as decommissioning progresses. Where sub-contractors that are contracted on site are governed by their own emergency response procedure a bridging arrangement will be adopted to allow for inclusion of the sub-contractor's ERP within this document.

4.1.1 Roles and Responsibilities

The chain of command during an emergency response sets out who is responsible for coordinating the response. The Site Supervisor/Construction Manager will lead the emergency response which makes him responsible for activating and coordinating the emergency response procedure. The other site personnel who can be identified at this time who will be delegated responsibilities during the emergency response are presented in Figure 4-1. In a situation where the Site Supervisor/ Construction Manager is unavailable or incapable of coordinating the emergency response, the responsibility will be transferred to the next person in the chain of command outlined in Figure 4-1. This will be updated throughout the various stages of the project.

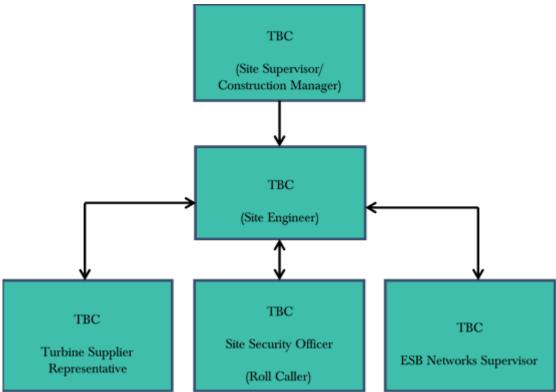


Figure 4-1 Emergency Response Procedure Chain of Command



4.1.2 **Initial Steps**

To establish the type and scale of potential emergencies that may occur, the following hazards have been identified as being potential situations that may require an emergency response in the event of an occurrence.

Table 4-1 Hazards associated with potential emergency situations

Hazard	Emergency Situation
	Zanosgonoj ostadaos
Construction Vehicles: Dump trucks, tractors,	Collision or overturn which has resulted in
excavators, cranes etc.	operator or third-party injury.
	Excessive movement of peat on site; onset of peat
Peat Instability	slide.
	Entanglement, amputation or electrical shock
Abrasive wheels/Portable Tools	associated with portable tools
	Electrical shock or gas leak associated with an
Contact with services	accidental breach of underground services
Fire	Injury to operative through exposure to fire
Falls from heights including falls from scaffold	
towers, scissor lifts, ladders, roofs and turbines	Injury to operative after a fall from a height
	Illness unrelated to site activities of an operative
Sickness	e.g. heart attack, loss of consciousness, seizure
	This will be included the turbine manufacturers'
Turbine Specific Incident	emergency response plan.

In the event of an emergency situation associated with, but not restricted to, the hazards outlined in Table 4-1 the Site Supervisor/Construction Manager will carry out the following:

- Establish the scale of the emergency situation and identify the number of personnel, if any, have been injured or are at risk of injury.
- Where necessary, sound the emergency siren/foghorn that activates an emergency evacuation on the site. The Site Supervisor/Construction Manager must proceed to the assembly point if the emergency poses any significant threat to their welfare and if there are no injured personnel at the scene that require assistance. The Site Supervisor/Construction Manager will be required to use their own discretion at that point. In the case of fire, the emergency evacuation of the site should proceed, without exception. The site evacuation procedure is outlined in Section 4.1.3.
- Make safe the area if possible and ensure that no identifiable risk exists with regard to dealing with the situation e.g. if a machine has turned over, ensure that it is in a safe position so as not to endanger others before assisting the injured.
- Contact the required emergency services or delegate the task to someone. If delegating the task, ensure that the procedures for contacting the emergency services as set out in Section 4.2 is followed.
- Take any further steps that are deemed necessary to make safe or contain the emergency incident e.g. cordon off an area where an incident associated with electrical issues has occurred.
- Contact any regulatory body or service provider as required e.g. ESB Networks the numbers for which as provided in Section 4.3.
- Contact the next of kin of any injured personnel where appropriate.



4.1.3 Site evacuation/Fire Drill

A site evacuation/fire drill procedure will provide basis for carrying out the immediate evacuation of all site personnel in the event of an emergency. The following steps will be taken:

- Notification of the emergency situation. Provision of a siren or foghorn to notify all personnel of an emergency situation.
- An assembly point will be designated in the construction compound area and will be marked with a sign. All site personnel will assemble at this point.
- A roll call will be carried out by the Site Security Officer to account for all personnel on site.
- The Site Security Officer will inform the Site Supervisor/Construction Manager when all personnel have been accounted for. The Site Supervisor/Construction Manager will decide the next course of action, which be determined by the situation that exists at that time and will advise all personnel accordingly.

All personnel will be made aware of the evacuation procedure during site induction. The Fire Services Acts of 1981 and 2003 require the holding of fire safety evacuation drills at specified intervals and the keeping of records of such drills.

4.1.4 Excessive Peat Movement

In the unlikely event of excessive peat movement or continuing peat movement recorded at a monitoring location, or identified at any location within the site, but no apparent signs of distress to the peat (e.g. cracking, surface rippling) then the following shall be carried out.

- 1. All decommissioning activities shall cease within the affected area.
- 2. Increased monitoring at the location shall be carried out. The area will be monitored, as appropriate, until such time as movements have ceased.
- Re-commencement of limited construction activity shall only start following a cessation of movement and the completion of a geotechnical risk assessment by a geotechnical engineer.
- 4. Such detailed monitoring and awareness will further ensure that the potential for 4.1.5 below is absolutely minimised.

4.1.5 Onset of Peat Slide

In the very unlikely event of an onset or actual detachment of peat (e.g. cracking, surface rippling) then the following shall be carried out.

- 1. On alert of a peat slide incident, all construction activities will cease, and all available resources will be diverted to assist in the required mitigation procedures.
- Where considered possible action will be taken to prevent a peat slide reaching any watercourse. This will take the form of the construction of check barrages on land. Due to the terrain, the possible short run-out length to watercourses, speed of movement and the inability to predict locations it may not be possible to implement any on-land prevention measures, in this case a watercourse check barrage will be implemented.
- 3. For localised peat slides that do not represent a risk to a watercourse and have essentially come to rest the area will be stabilised initially by rock infill, if required. The failed area and surrounding area will then be assessed by the geotechnical engineer and stabilisation procedures implemented. The area will be monitored, as appropriate, until such time as movements have ceased.



4.1.6 Spill Control Measures

Every effort will be made to prevent an environmental incident during the decommissioning phase of the project. Oil/fuel spillages are one of the main environmental risks that will exist on the site which will require an emergency response procedure. The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. The following steps provide the procedure to be followed in the event of such an incident:

- Stop the source of the spill and raise the alarm to alert people working in the vicinity of any potential dangers.
- If applicable, eliminate any sources of ignition in the immediate vicinity of the incident.
- Contain the spill using the spill control materials, track mats or other material as required. Do not spread or flush away the spill.
- If possible, cover or bund off any vulnerable areas where appropriate such as drains, watercourses or sensitive habitats.
- If possible, clean up as much as possible using the spill control materials.
- Contain any used spill control material and dispose of used materials appropriately using a fully licensed waste contractor with the appropriate permits so that further contamination is limited.
- Notify the ECoW immediately giving information on the location, type and extent of the spill so that they can take appropriate action.
- The ECoW will inspect the site and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring.
- The ECoW will notify the appropriate regulatory body such as the local authority, and the Environmental Protection Agency (EPA), if deemed necessary.

The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. Environmental incidents are not limited to just fuel spillages. Therefore, any environmental incident must be investigated in accordance with the following steps.

- The ECoW must be immediately notified.
- If necessary, the ECoW will inform the appropriate regulatory authority. The appropriate regulatory authority will depend on the nature of the incident.
- The details of the incident will be recorded on an Environmental Incident Form which will provide information such as the cause, extent, actions and remedial measures used following the incident. The form will also include any recommendations made to avoid reoccurrence of the incident.
- If the incident has impacted on a sensitive receptor such as an archaeological feature the ECoW will liaise with the Project Archaeologist.
- A record of all environmental incidents will be kept on file by the ECoW and the Main Contractor. These records will be made available to the relevant authorities such as the local authority and EPA, if required.

The ECoW will be responsible for any corrective actions required as a result of the incident e.g. an investigative report, formulation of alternative works methodologies or environmental sampling, and will advise the Main Contractor as appropriate.



4.2 Contact the Emergency Services

In the event of requiring the assistance of the emergency services the following steps should be taken:

Stay calm. It is important to take a deep breath and not get excited. Any situation that requires 999/112 is, by definition, an emergency. The dispatcher or call-taker knows that and will try to move things along quickly, but under control.

Know the <u>location</u> of the emergency and the number you are calling from. This may be asked and answered a couple of times but do not get frustrated. Even though many emergency call centres have enhanced capabilities meaning they are able to see your location on the computer screen they are still required to confirm the information. If for some reason you are disconnected, at least emergency crews will know where to go and how to call you back.

Wait for the call-taker to ask questions, then answer clearly and calmly. If you are in danger of assault, the dispatcher or call-taker will still need you to answer quietly, mostly "yes" and "no" questions.

If you reach a recording, listen to what it says. If the recording says your call cannot be completed, hang up and try again. If the recording says all call takers are busy, WAIT. When the next call-taker or dispatcher is available to take the call, it will transfer you.

Let the call-taker guide the conversation. He or she is typing the information into a computer and may seem to be taking forever. There is a good chance, however, that emergency services are already being sent while you are still on the line.

Follow all directions. In some cases, the call-taker will give you directions. Listen carefully, follow each step exactly, and ask for clarification if you do not understand.

Keep your eyes open. You may be asked to describe victims, suspects, vehicles, or other parts of the scene.

Do not hang up the call until directed to do so by the call taker.

Due to the remoteness of the site it may be necessary to liaise with the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable. A list of emergency contacts is presented in Table 4-2. A copy of these contacts will be included in the Site Safety Manual and in the site offices and the various site welfare facilities.

Table 4-2 Emergency Contacts

Contact	Telephone no.
Emergency Services – Ambulance, Fire, Gardaí	999/112
Doctor - Dr. Paul Kieran, Westbury Centre, Corbally, Co. Limerick	061350001
St. John's Hospital, Co. Limerick	061462222
ESB Emergency Services	1850 372 999
Gas Networks Ireland Emergency	1850 20 50 50
Gardaí – Henry Street Garda Station.	061212400



Contact	Telephone no.
Health and Safety Co-ordinator - Health & Safety Services	TBC
Health and Safety Authority	1890 289 389
Inland Fisheries Ireland (IFI)	1890 347 424
Project Supervisor Construction Stage (PSCS): TBC	ТВС
Project Supervisor Design Stage (PSDS): TBC	ТВС
Client: FuturEnergy Knockshanvo Designated Activity Company	TBC

4.3 **Procedure for Personnel Tracking**

All operatives on site without any exception will have to undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.

In the event of a site operative becoming involved in an emergency situation where serious injury has occurred and hospitalisation has taken place, it will be the responsibility of the Site Manager or next in command if unavailable to contact the next of kin to inform them of the situation that exists.

4.4 Induction Checklist

Table 4-3 provides a list of items highlighted in this ERP which must be included or obtained during the mandatory site induction of all personnel that will work on the site. This will be updated throughout the various stages of the project.

Table 4-3 Emergency Response Plan Items Applicable to the Site Induction Process

ERP Items to be included in Site Induction	Status
All personnel will be made aware of the evacuation procedure during site induction	
Due to the remoteness of the site, it may be necessary to liaise with and assist the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and subcontractors aware of any such arrangement or requirement if applicable.	
All operatives on site without any exception will have undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.	



PROGRAMME OF WORKS

Decommissioning Schedule

The decommissioning phase will take approximately 5 months to complete from commencing the removal of development components to the final reinstatement of the site.

At this time, it is not possible to determine when decommissioning will take place.

The phasing and scheduling of the main decommissioning task items are outlined in Figure 5-1 below, where the 1st January has been shown as an indicative start date for decommissioning to commence.

ID	Task Name	Task Description	Jan	Feb	Mar	Арг	May
1	Site Health & Safety						
2	Turbine Decommissioning	Disconnect power output					
3	Turbine Dismantling	Disassemble turbine components					
4	Turbine Removal	Transport of all turbine components offsite					
	Cable Removal	Remove underground cables from ducting					
6	Turbine Foundation Backfill	Reinstate foundation areas by covering with soil material					

Figure 5-1 Indicative Decommissioning Schedule



MITIGATION PROPOSALS

All mitigation measures relating to the pre-commencement, construction, operational and decommissioning phases of the Proposed Development were set out in the various sections of the EIAR and NIS prepared as part of the planning permission application for the Proposed Development.

This section of the Decommissioning Plan groups together all the mitigation measures presented in the above documents. The Mitigation Measures are presented in Table 6-1 below.

By presenting the mitigation proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the decommissioning phase of the project.



Table 6-1 Mitigation Measures

Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required	
		Decommissioning Phase			
MM1	EIAR Chapter 4	Prior to the end of the operational period the Decommissioning Plan will be updated in line with decommissioning methodologies that may exist at the time and will agree with the competent authority at that time.			
MM2	DP Section 3	The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.			
MM3	DP Section 3	Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the source material used for the site reinstatement works, specifically the turbine and metrological mast foundation backfilling. The invasive species survey will also be undertaken along the cable route to identify invasive species at joint bay locations where excavation to expose the cabling for removal will be required.			
MM4	EIAR Chapter 4	The effectiveness of drainage measures in the natural drainage regime that will have resumed by the time of decommissioning will be monitored continuously by the ECoW or supervising hydrologist on-site. The EcoW or supervising hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site.			
MM5	EIAR Chapter	On removal of turbines and metrological mast, the covering of the foundation will be completed using material imported to site where the required quantity of material does not exist at the site. The small volumes of imported soil will be			



Reference Location	Mitigation Measure	Audit Result	Action Required
DP Section 2	spread and graded over the foundation using a tracked excavator and revegetation enhanced by spreading of an appropriate seed mix to assist in revegetation and accelerate the resumption of the natural drainage management that will have existed prior to any construction.		
EIAR Chapter 4 DP Section 3	The following mitigation measures are proposed to avoid release of hydrocarbons at the site: All plant will be inspected and certified to ensure that they are leak free and in good working order prior to uses at the Wind Farm site. On site re-fuelling of machinery will be carried out using a mobile double skinned fuel bowser: The fuel bowser, a double-axel custom-built refuelling trailer will be re-filled off site, and will be towed around the site by a 4x4 jeep to where machinery is located. The 4x4 jeep will also carry fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser will be parked on the level substation platform when not in use. Only designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations. Fuels volumes stored on site will be minimised. Any fuel storage areas will be bunded appropriately for the fuel storage volume for the time period of the decommissioning and fitted with a storm drainage system and an appropriate oil		



Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
		 The plant used will be regularly inspected for leaks and fitness for purpose; and, An emergency plan for the decommissioning phase to deal with accidental spillages will be developed (refer to Section 4). Spill kits will be available to deal with and accidental spillage in and outside the refuelling area. A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the decommissioning phase. 		
MM7	EIAR Chapter 10	Proposed measures, the same as those proposed for the construction phase, to control dust include:		
	DP Section 3	 Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions. The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the Site Manager for cleanliness and cleaned as necessary. Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods. The transport of material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary. All site related traffic will have speed restrictions on un-surfaced roads to 15 kph. Daily inspection of the site to examine dust measures and their effectiveness. 		



Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
		When necessary, sections of the haul route will be swept using a truck mounted vacuum sweeper.		
MM8	EIAR Chapter 12	Proposed measures, the same as those proposed for the construction phase, to control noise include:		
	DP Section 3	 Limiting the hours during which site activities likely to create high levels of noise or vibration are permitted. Establishing channels of communication between the contractor/developer, Local Authority and residents. Appointing a site representative responsible for matters relating to noise and vibration. Monitoring typical levels of noise and vibration during critical periods and at sensitive locations. Keeping the surface of the site access roads even to mitigate the potential for vibration from lorries. The best means practicable, including proper maintenance of plant, will be employed to minimise the noise produced by on site operations. All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the contract. Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts. Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All plant and equipment to be used on-site will be modern equipment and will comply with the European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations. 		



Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
		 Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers. Compressors will be attenuated models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers Machines, which are used intermittently, will be shut down during those periods when they are not in use. Noise limits, noise control measures, hours of operation (i.e. dusk and dawn is high faunal activity time) and selection of plant items will be considered in relation to disturbance of birds. Training will be provided by the Site Manager to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and, Local areas of the haul route will be condition monitored and maintained, if necessary. 		
ММ9	EIAR Chapter 15 DP Section 3	A Traffic Management Plan will be prepared in advance of any decommissioning works. The removal of development components from site will be undertaken by a specialist haulier. The traffic management arrangements will be agreed in advance of decommissioning with the relevant authorities.		
MM10	DP Section 3	A WMP detailing the best practice procedures during the decommissioning of the Proposed Development will be prepared. The WMP will outline the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of decommissioning. Disposal of waste will be a last resort.		



7. MONITORING PROPOSALS

This section of the Decommissioning Plan groups together all of the monitoring proposals presented in the planning documentation. The monitoring proposals are presented in Table 7-1 below.

By presenting the monitoring proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the operational phase of the project. The tabular format in which the below information is presented, can be further expanded upon during the course of operation to provide a reporting template for site compliance audits.



Table 7-1 Schedule of Monitoring Proposals

Ref. No.	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility
		Decommissioning Phases			
MX1	DP Section 3	Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the source material used for the site reinstatement works and backfill. The cable route will also be surveyed to identify invasive species at joint bay locations where excavation to expose cabling for removal will be required.	As required	As required	Project Ecologist
MX2	DP Section 3	The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.	As required	As required	Site Manager
MX3	DP Section 3	In general, the ECoW will maintain responsibility for monitoring the decommissioning works and Contractors/Sub-contractors from an environmental perspective. The ECoW will act as the regulatory interface on environmental matters. The Site Manager will be responsible for reporting to and liaising with Cork County Council and other statutory bodies as required	As required	As required	ECoW/ Site Manager
MX4	EIAR Chapter	Regular inspections of all installed drainage systems will be undertaken, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water in parts of the systems where it is not intended	As Required	Weekly	ECoW
MX5	CEMP Section 3	Training and supervision of drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation during the decommissioning phase.	As Required	As Necessary	ECoW



Ref. No.	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility
MX6	CEMP Section 4	Daily general visual inspections of site operations and inspections of all watercourses within the site and in the surrounding area by the ECoW or a suitably qualified and competent person as delegated by the ECoW	Weekly / As Required	As Necessary	ECoW
MX7	EIAR 2019 Section 6 EIAR 2022 Section 7	Any requirement for construction works to run into the subsequent breeding season (1st March to 31st August inclusive) following commencement will be subject to a repeat of the pre-construction bird surveys to confirm the absence of breeding birds of conservation concern (including hen harrier). The ECoW will:	Monthly (March – August)	As Necessary	Project Ornithologist
	EIAR 2023 Section 7	 Oversee a pre-construction transect/walkover bird survey to ensure that significant effects on breeding birds will be avoided. Inform and educate on-site personnel of the ornithological and ecological sensitivities within the Proposed Development. Oversee management of ornithological and ecological issues during the construction period and advise on ornithological issues as they arise. Provide guidance to contractors to ensure legal compliance with respect to protected species onsite. Liaise with officers of consenting authorities and other relevant bodies with regular updates in relation to construction progress. 			



COMPLIANCE AND REVIEW

8.1 Site Inspections and Environmental Audits

Routine inspections of decommissioning activities will be carried out on a daily and weekly basis by the ECoW and the Site Supervisor/Construction Manager to ensure all controls to prevent environmental impacts, relevant to the decommissioning activities taking place at the time, are in place.

Environmental inspections will ensure that the works are undertaken in compliance with this Decommissioning Plan and all other planning application documents. Only suitably trained staff will undertake environmental site inspections.

8.2 **Auditing**

An Environmental audit will first be carried out prior to the construction phase of the development to ensure the implementation of pre-construction mitigation measures, completion of baseline studies and implementation of pre-construction felling mitigation measures. Further environmental audits will be carried on a monthly basis during the construction phase of the project and again after the commissioning of the wind turbines.

In contrast to monitoring and inspection activities, audits are designed to shed light on the underlying causes of non-compliance, and not merely detect the non-compliance itself. In addition, audits are the main means by which system and performance improvement opportunities may be identified. Environmental audits will be carried out by the ECoW on behalf of the appointed contractor. It is important that an impartial and objective approach is adopted. Environmental audits will be conducted at planned intervals to determine whether the Decommissioning Plan is being properly implemented and maintained. The results of environmental audits will be provided to the contractor.

An audit of compliance with the decommissioning mitigation measures will be completed by the ECoW during the decommissioning phase of the development. The findings of each audit will be documented by the ECoW in an audit report within the Decommissioning Plan for the site. The audit report will be made available to the local authority on request.

8.3 Environmental Compliance

The following definitions shall apply in relation to the classification of Environmental Occurrences during decommissioning of the proposed wind farm development:

Environmental Near Miss: An occurrence which if not controlled or due to its nature could lead to an Environmental Incident.

Environmental Incident: Any occurrence which has potential, due to its scale and nature, to migrate from source and have an environmental impact beyond the site boundary.

Environmental Exceedance Event: An environmental exceedance event occurs when monitoring results indicate that limits for a particular environmental parameter (as indicated in the Environmental Monitoring Programme) has been exceeded.

An exceedance will immediately trigger an investigation into the reason for the exceedance occurring and the application of suitable mitigation where necessary.

Exceedance events can be closed out on achieving a monitoring result below the assigned limit for a particular environmental parameter.



Environmental Non-Compliance: Non-fulfilment of a requirement and includes any deviations from established procedures, programs and other arrangements related to the EMP.

8.4 Corrective Action Procedure

A corrective action is implemented to rectify an environmental problem on-site. Corrective actions will be implemented by the Site Supervisor/Construction Manager, as advised by the Site Environmental Clerk of Works. Corrective actions may be required as a result of the following.

- > Environmental Audits.
- Environmental Inspections and Reviews.
- Environmental Monitoring.
- > Environmental Incidents; and,
- Environmental Complaints.

A Corrective Action Notice will be used to communicate the details of the action required to the main contractor. A Corrective Action Notice is a form that describes the cause and effect of an environmental problem on site and the recommended corrective action that is required. The Corrective Action Notice, when completed, will include details of close out and follow up actions.

If an environmental problem occurs on site that requires immediate attention direct communications between the Site supervisor/Construction Manager and the ECoW will be conducted. This in turn will be passed down to the site staff involved. A Corrective Action Notice will be completed at a later date.

8.5 **Decommissioning Plan Review**

This Decommissioning Plan will be updated and reviewed prior to commencement of decommissioning works. Further updates will be completed to the plan during decommissioning works to adapt to specific situations that are encountered that need to be considered by the plan. This decommissioning plan is informed by the Scottish Natural Heritage report (SNH) *Research and Guidance on Restoration and Decommissioning of Onshore Wind Farms* (SNH, 2013)