

17 Schedule of Environmental Commitments

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17 Schedule of Environmental Commitments

17.1 Introduction

- 17.1.1 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 ES 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 at the construction stage.
- 17.1.2 Table 17.1 presents a Schedule of Environmental Commitments for the Revised Development, listed according to the relevant environmental topic area.

Table 17.1 - Schedule of Environmental Commitments

Environmental Subject Area	Environmental Commitment	Timing
The Revised Development		
Infrastructure	There will be a micro-siting allowance in all directions in respect of each turbine (50m) hard-standing (50m), construction compounds (50m), substation (50m), watercourse crossings and access track (50m) in order to address any potential difficulties which may arise in the event that pre-construction surveys identify unsuitable ground conditions or environmental constraints. It is proposed that the final positioning of the infrastructure will be addressed through an appropriately worded condition.	Pre-construction
Meteorological monitoring mast(s)	It is proposed that the final positioning, height and aviation lighting requirements will be addressed through an appropriately worded condition.	Pre-construction
Public roads	Prior to construction, any required works to public roads will be undertaken, and appropriate highway safety measures will be agreed with South Lanarkshire Council (SLC), with necessary signage or traffic control measures implemented throughout the construction phase on the agreed basis.	Pre-construction and pre-decommissioning
Drainage design	A detailed drainage design will be undertaken and provided to SEPA and the Local Authority prior to construction.	Pre-construction
Construction Environmental Management Plan (CEMP)	<p>The Applicant shall produce the CEMP in consultation with the Local Authority, SNH, SEPA, WoSAS and Historic Environment Scotland prior to construction beginning.</p> <p>The CEMP shall include, but not be limited to, the following subjects:</p> <ul style="list-style-type: none"> - noise and vibration; - dust and air pollution; - surface and ground water; - ecology (including protection of habitats and species); - agriculture (including protection of livestock and land); - cultural heritage; - waste (construction and domestic); - pollution prevention strategy; - pollution incidence response (for both land and water); and - site operations (including maintenance of the construction compound, working hours and safety of the public). 	Pre-construction and pre-decommissioning

Environmental Subject Area	Environmental Commitment	Timing
	<p>The Applicant shall provide the following for the above disciplines:</p> <ul style="list-style-type: none"> - Details of the all the environmental mitigation which is described within the Schedule of Environmental Commitments and how the Contractor will implement this mitigation and monitor its implementation and effectiveness. - Details of how the Contractor will abide by the local and national legislative requirements e.g. CAR Regulations (Scottish Government, 2011). - Details of how the Contractor will implement and monitor construction best practice techniques e.g. the control of noise and dust. - Details of a Waste Management Plan which will include opportunities to reduce and re-use waste on site, recycling of waste which cannot be reused and disposal of waste to landfill. - Details on how the Contractor will liaise with the public and local landowners and how they will respond to any queries and/or complaints. 	
CEMP	The Contractor shall report on a regular basis to the Applicant on the implementation of the CEMP. The Contractor shall amend and improve the CEMP as required throughout the construction and decommissioning period.	Construction and decommissioning
Construction Traffic Management Plan (CTMP)	The Applicant shall produce a CTMP in agreement with the Local Authority prior to access to site being granted. The CTMP will detail the management of traffic to and from site, including abnormal loads and daily workers commute. It shall also include mitigation for impacts to public transport, local private access and public foot paths, cycle ways and bridleways where relevant. The Contractor and/or Developer shall amend and improve the CTMP as required throughout the construction and decommissioning period.	Pre-construction and pre-decommissioning
Operation Environmental Management Plan (OEMP)	<p>The OEMP will be developed in consultation with SNH, SEPA and SLC and will include but not be limited to:</p> <ul style="list-style-type: none"> - details on the track, water crossings and turbine maintenance; - the control and monitoring of noise; - the control and monitoring of surface and groundwater; - a pollution prevention plan and a pollution incidence response plan; - details of how the Developer will abide by the local and national legislative requirements e.g. The Water Environment (Controlled Activities) (Scotland) Regulations 2011; and - a Habitat Management Plan and relevant Species Protection Plan. 	Pre-operation

Environmental Subject Area	Environmental Commitment	Timing
Access Strategy	An Outline Access Strategy has been developed for the Revised Development site, which formalises a network of paths across the site and builds on and enhances the existing path network in the local area which is already well used. As such, it is important that public access is maintained during the construction phase subject to standard health and safety requirements. It is anticipated that it would be a condition of any planning approval for the Revised Development that a Detailed Access Strategy be submitted to and approved by SLC prior to the commencement of development, and the approved Strategy be implemented within a timescale agreed with the local community and SLC.	Pre-Construction
Landscape and Visual		
The primary mitigation adopted in relation to the Revised Development is embedded within the design of the Revised Development and relates to the consideration that was given to avoiding and minimising landscape and visual effects during the evolution of the Revised Development layout. A design rationale was established to guide the design evolution. The preliminary Landscape Design Layout aimed to avoid inconsistent turbine spacing, large gaps, outliers or excessive overlapping turbines to minimise visual confusion and ensure a balanced / compact array from key views.		
Visual mitigation during operation	The turbines would be painted an off white colour with a low reflectivity semi-matt finish (or similar as agreed with the Local Planning Authority (LPA)), widely regarded to be the least intrusive in the landscape when seen against the sky in a host of weather conditions typically experienced within the UK.	Operation
Recreational Enhancement	Delivery of an Access Strategy & Heritage Trail which will aim to develop a network of paths around and across the Revised Development site, including reconnecting Douglas and Coalburn with a formal footpath link through the former Dalquhandy Opencast site.	Operation
Landscape and Visual Enhancements	Implementation of a Habitat Management Plan (HMP) which includes proposals to protect, enhance and enlarge a small broad-leaved plantation, scrub, acid/neutral/calcareous grassland, improved and marshy grassland as well as the dry and wet dwarf shrub heath. The HMP includes a series of prescriptions to deliver the objectives. These objectives of the HMP will deliver ecological but also landscape and visual enhancements where despoiled areas of the site are re-vegetated.	Operation
Ecology and Nature Conservation		
Design mitigation is incorporated into the layout of the infrastructure and includes various ecological constraints in order that effects were avoided/minimised from the outset. This has resulted in avoidance of highly groundwater-dependent ecosystems and key features for otter and badger, utilising the existing road as much as possible to reduce habitat and watercourse disturbance. To protect and reduce disturbance to bats turbines are located over 50 m away from features (blade tip to the top of the feature) that are used by commuting and foraging bats.		

Environmental Subject Area	Environmental Commitment	Timing
General	Arrangements for pre-construction ecological surveys will be conducted within 6 months of construction commencement and will be set out in the CEMP. The CEMP will be agreed with relevant statutory consultees prior to the commencement of construction.	Pre-construction and pre-decommissioning
Watercourses	Pollution prevention mitigation measures and arrangements for ecological monitoring during construction shall also be set out in the CEMP. The CEMP will be implemented across the whole site during construction. These measures shall be designed in order that the watercourses on site (and those into which the site discharges) are protected against pollution. These aspects of the CEMP will be monitored by a suitably qualified Ecological Clerk of Works (ECoW).	Construction
	The ECoW will also be required to advise and supervise, where appropriate, and will have the power to stop works at any stage should it be deemed necessary. The ECoW will provide tool box talks on the ecological sensitivities within the site to all site personnel prior to them commencing work.	Pre-construction, Construction
	The existing culvert along the Shiel Burn is damaged and does not allow for easy passage by small mammals; it also does not allow for the upstream passage of fish species. The culvert will be removed and the watercourse reinstated in this area during -construction. This will provide enhancement of the watercourse in this area.	Construction
Ground Water Dependent Terrestrial Ecosystems (GWDTEs)	<p>Mitigation measures that will be implemented during construction to minimise or avoid impacts on potential GWDTEs include:</p> <ul style="list-style-type: none"> • The ECoW to direct and oversee micrositing of infrastructure and activities on site to avoid impacts on potential GWDTEs where possible, for instance micrositing to avoid flushes; • The permeability of roads will be maintained by installation of regular cross drains (which would be detailed in a construction method statement); • If clay is sourced from excavations it can be used to create bunds to restrict drainage effects from construction; • Natural re-colonisation will ensure full vegetation reinstatement of excavated areas (that do not have infrastructure overlain); and • Should any bare soil exist, this will be monitored by the ECoW at regular intervals over the following 6 months to 1 year to ensure that re-vegetation is successful. If early growth does not appear then action (such as re-seeding) should be taken to prevent erosion or sediment washing off site. 	Construction

Environmental Subject Area	Environmental Commitment	Timing
Disturbance reduction / Mammal Protection	Good practice measures will be implemented throughout the construction phases in order to minimise the risks associated with a construction site on all wild animals in line with SNH guidance.	Construction
	<p>The Species Protection Plan (SPP) will be agreed with the Local Authority, in consultation with SNH, and agreed prior to construction commencement. The SPP will include measures to protect and reduce disturbance to species on site, as outlined below:</p> <ul style="list-style-type: none"> • Covering/securing all excavations and piping or provision of an 'exit route' where covering is not practical; • Night time working will be minimised to reduce disturbance to nocturnal and diurnal fauna. Where this is not possible, directional lighting away from features (including mammal paths, tree lines and watercourses) will be used to minimise light disturbance; and • A speed limit of 15 mph for all vehicles on site will help to reduce disturbance and mortality to protected species. 	Pre-construction and construction
	Badger setts and otter holts within the site will be protected by a 30 m protection zone, demarcated using coloured tape, or something of similar visible marking prior to commencement of works. There will be no blasting activities within 100 m of the badger setts. A licence from SNH to disturb otters or badgers will not be required if this buffer distance is maintained.	Pre-construction and construction
Mitigation through enhancement during operation	The CEMP will contain provisions such as habitat management measures and ecological monitoring that will be undertaken throughout the operational phase of the Revised Development. Maintenance operations will follow the same safety and environmental procedures as for the construction phase.	Operation
	A Habitat Management Plan (HMP) will be produced with the aim to restore wet heath in the southern part of the site and enhance surrounding habitats across the previously restored opencast coal mine area. This represents an enhancement measure and will negate the minor losses to the wet heath Annex 1 habitat. The HMP will be finalised and then approved with the Local Authority and SNH prior to construction commencement. The HMP will remain a live document for the lifetime of the Revised Development.	Pre-construction and operation
Mitigation during decommissioning	Mitigation measures proposed for the construction phase of the Revised Development will also be implemented for the decommissioning phase. These measures will be agreed with the planning authority as part of the CEMP approval process.	Decommissioning

Environmental Subject Area	Environmental Commitment	Timing
Ornithology		
Mitigation during pre-construction	A CEMP will be agreed prior to construction commencing. This will be agreed with SLC and relevant statutory consultees. The CEMP will include details of mitigation, good practice construction methods, pollution prevention measures, compliance with ecological legislation and protection of biodiversity.	Pre-construction
	As part of the CEMP, a Breeding Bird Protection Plan (BBPP) will be produced, and will be approved by the planning authority in consultation with SNH prior to implementation. The BBPP will detail the procedures to be followed to ensure reasonable precautions are taken to avoid disturbance to breeding birds on the Revised Development site. Likely measures may include, but will not be limited to, appropriate buffer distances from confirmed nest sites, toolbox talks and ornithological monitoring.	Pre-construction
Black Grouse	Surveys for lekking black grouse will be completed immediately prior to, and during the construction phase in March, April and May. Should any leks be identified within the Revised Development site, a 500 m disturbance buffer will be established and no activity should occur in these areas during the periods from one hour before dawn to 09:00 and after 18:00 to one hour after dusk within the black grouse breeding season, April to July, unless otherwise agreed with SNH. An Ecological Clerk of Works (ECoW) will oversee the implementation of the above measures.	Construction
Other species	Based on the level of significance of effect predicted during construction and decommissioning for all other species, no specific mitigation measures are required. The BBPP will help avoid disturbance to breeding birds on the Revised Development site.	Construction and decommissioning
Mitigation during Operation	<p>The Hagshaw Hill Extension Black Grouse Management Plan has aimed to increase the local population of the species by tree planting adjacent to the western boundary of the EIA Study Area, as well as along the Robshill Burn, plus moorland management.</p> <p>It is proposed to increase tree and shrub planting along the watercourse beside Rob's Hill – around the existing planting for Hagshaw Hill Extension. This mitigation will increase the amount of habitat suitable for black grouse within the area, and also help offset any possible losses in habitat availability because of the presence of infrastructure in proximity to the Hagshaw Hill Extension management areas.</p> <p>A HMP will be developed with statutory consultees to enhance the habitats for black grouse, and through the management of heath habitats and grazing densities will enhance invertebrate resource for feeding waders and their chicks.</p>	Operation

Environmental Subject Area	Environmental Commitment	Timing
Noise		
Construction Noise	Control of working hours and best working practices to be implemented during construction.	Construction
Operational Noise	Operational monitoring will be agreed with SLC as required, to ensure compliance with noise limits imposed by planning conditions, with the option of selective constraint of turbine operation, if found to be a requirement.	Operation
Historic Environment		
Mitigation for direct impacts	Known archaeological sites identified, which are in close proximity to the development infrastructure will be avoided by careful delineation with an appropriate buffer prior to site work commencing. Such sites will be marked out by professional archaeologists. These buffer zones will be practical, and discussed where necessary in close consultation with the West of Scotland Archaeological Society.	Pre-construction
Mitigation for indirect impacts	The development and promotion of a local Heritage Trail (part of Detailed Access Strategy) will help to offset residual effects of the Revised Development. This will include the use of interpretation boards along new paths created by the Revised Development and existing pathways to increase public awareness and promote local history and cultural assets en-route.	Operation
Mitigation during construction	An archaeological watching brief will be undertaken during all ground breaking works across areas of the site undisturbed by the 20 th century mining operations, to ensure that any damage to recorded features is subject to appropriate levels of mitigation, while allowing for the identification of any previously unrecorded archaeological sites and ensuring these are appropriately recorded during site works.	Construction
	Those sites which it is anticipated will be directly impacted by the Revised Development (Sites (2), (4), (19) and (22)) will be subject to appropriate levels of recording prior to, and during removal	Construction
	All identified archaeological sites within the Revised Development area which are in the vicinity of site works (such as Archaeology Sites (5), (6), (8), and (10) and (11)) will be carefully cordoned off and delineated to ensure avoidance during construction. Such delineation will also include those unaffected areas of sites which are already directly impacted by construction, such as the wider areas of Site (4). This process will be undertaken by qualified heritage professionals.	Construction
	No work will commence on site until a Written Scheme of Investigation (WSI) outlining the standards and methodology to be adhered to by the chosen archaeological contractor has been submitted to, and approved in writing by, WoSAS and SLC.	Pre-construction

Environmental Subject Area	Environmental Commitment	Timing
Hydrology, Hydrogeology and Geology		
Mitigation during pre-construction	In order to determine the ground and groundwater conditions across the site, pre-construction site investigations will be conducted. These investigations will focus on areas where construction is proposed to be undertaken and will allow the turbines and the associated infrastructure to be micro-sited away from unsuitable areas, such as areas of contamination or where there are significant groundwater flows.	Pre-construction
	The investigations will also include targeted monitoring and assessment of the groundwater levels and flows beneath the site. This will allow for micro-siting of the features of the Revised Development and to assist in the detailed design of infrastructure and selection of appropriate materials for use during the construction process.	Pre-construction
Mitigation during construction	The appointed Contractor will undertake pre-construction baseline water quality sampling and analysis at the Poniel Water, Shiel Burn, Longhill Burn and Alder Burn and implement a programme of regular monitoring and analysis of the water quality of the watercourses throughout the construction period.	Construction
	With specific reference to the SEPA ' <i>Guidelines for Water Pollution Prevention from Civil Engineering Contracts</i> ' and ' <i>Special Requirements</i> ', the Contractor will produce a CEMP prior to the commencement of operations which contains a construction method statement that includes: <ul style="list-style-type: none"> • a detailed breakdown of the phasing of construction activities; • a pollution risk assessment of the Site and the proposed activities; • identification of all Controlled Waters that may be affected by the works and temporary discharge points to these watercourses; • planning and design of appropriate pollution control measures during earthworks and construction management of the pollution control system, including dewatering of excavations away from watercourses; • contingency planning and emergency procedures; and • ongoing monitoring of construction procedures to ensure management of risk is maintained. 	Pre-construction
	All earth moving works or similar operations will be carried out in accordance with BSI Code of Practice for Earth Works BS6031:1981.	Construction
	All watercourse crossings and site discharges will be regulated under the CAR licensing regime and all necessary licences will be sought from SEPA prior to the commencement of any operations on site.	Pre-construction

Environmental Subject Area	Environmental Commitment	Timing
	All concrete batching activities will be undertaken a minimum of 30 m from any watercourse or surface drain to minimise the risk of runoff entering a watercourse. The concrete batching area will have a contained facility for washing out and cleaning of concrete batching plant.	Construction
	While it is acknowledged that best practice to minimise run-off would be to undertake construction and dismantling during the driest period of the year, given the location of the Revised Development site in South Lanarkshire, there are likely to be significant periods of rainfall throughout the year. Therefore, site management will check the local weather forecast daily and prime all site staff to ensure that everyone is aware of their responsibilities to maintain the pollution control system during wet weather or suspend sensitive operations during adverse weather conditions.	Construction and decommissioning
	Where topography dictates that working platforms are needed, these will be formed to ensure that surface water drains away from watercourses.	Construction
	All fuel and other chemicals will be stored in accordance with best practice procedures, including being kept within a designated fuelling site located at a safe distance from existing watercourses and in appropriate impermeable bunded containers/areas, which will be defined within the CEMP. These will be designed to capture any leakage, whether from a tank or from associated equipment such as filling and off-take points, sighting gauges etc., all of which will be located within the bund.	Construction
	Oil booms and soakage pads will be maintained in all work areas and spill kits kept in all vehicles to enable a rapid and effective response to any accidental spillage or discharge. All construction staff will be trained in the effective use of this equipment.	Construction
	Construction vehicles and plant will be regularly maintained and all maintenance, fuelling and vehicle washing will be undertaken on appropriate impermeable surfaces away from watercourses in order to minimise risks of leaks to soil and surface waters.	Construction
	The temporary concrete batching area on site will have a micro-siting allowance of 50m in all directions. The Contractor will develop a method statement to address the batching, transport, transfer, handling and pouring of liquid concrete at foundations in order to minimise risks of spillage to soil and surface waters.	Construction
	Cement, grout and unset concrete will not be allowed to enter the water environment. No operations involving concrete transfer between vehicles or into vehicles will take place within 30 m of watercourses and waterbodies.	Construction

Environmental Subject Area	Environmental Commitment	Timing
	All vehicles used for delivery of concrete will only be washed out at locations to be agreed with SEPA. Excess concrete or wash-out liquid will not be discharged to drains or watercourses on site or at compounds. Drainage from washout facilities will be collected and treated or removed to an appropriate treatment point/licensed disposal site.	Construction
	The requirement for dewatering will be minimised in all locations by timely and efficient excavation of the foundation void and subsequent concrete pouring and backfilling.	Construction
	During the construction phase, construction staff will be instructed to maintain a sufficient distance from the burns located on site in order to ensure there is no incursion towards the burn.	Construction
	Where the required bottomless arch culvert crossings are being constructed, foundations will be set back to prevent impact on the integrity of the banking of watercourses. Detailed design will be included within a Construction Method Statement to be agreed with SLC and SEPA and detailed watercourse crossing designs will be regulated under the CAR licensing regime.	Construction
	Welfare facilities will either connect directly to the foul sewer, self-contained storage tanks or to a septic tank, subject to approval from Scottish Water and SEPA.	Construction
	If self-contained or septic tanks are to be used, these will be maintained and emptied on a regular basis by a suitably licensed contractor.	Construction
	The proposed access tracks have been designed to use the shortest amount of track possible, while respecting topographical and other environmental constraints. In the main, topsoil and subsoil will be stripped over the full width of the road corridor, including the drainage channel. Strip depths will vary, but will normally be around 500 mm down to a substrate of firm till or weathered rock. Stripped soils will be stored in temporary windrows on either side of the road, and then used in forming soft verges to roads, or to improve soil cover on the previously opencast areas within the site.	Construction
	The CEMP will also include a requirement for defined and delineated working areas for heavy machinery to avoid unnecessary compaction of soils.	Construction
Mitigation during operation	Prior to construction, a detailed Drainage Strategy (DS) will be developed and agreed with SEPA and SLC. The DS will detail the site drainage design, including the type of surface to be used for the access track, the soft engineering and habitat enhancement measures proposed to slow surface water flows and any necessary ponds, swales, cross drains and bunds, to ensure that runoff from hard surfaces will be controlled. The DS will also detail the dimensions of any proposed pipe culverts for watercourse crossings which will be designed to maintain continuous flows.	Operation

Environmental Subject Area	Environmental Commitment	Timing
	Prior to construction, detailed design for the watercourse crossings, and the requirements for CAR authorisations or licences will be agreed with SEPA in order to ensure that fluvial geomorphological impacts are minimised during operation.	Operation
Traffic and Transport		
Mitigation and monitoring measures for construction phase	<p>Even though the predicted impacts arising from the development have been assessed as being negligible, the following measures have been identified as good practice in terms of construction management in order to help minimise the impacts from the construction phase of the Revised Development:</p> <ul style="list-style-type: none"> • preparation and implementation of a Construction Traffic Management Plan; • use of the agreed access routes to the site will be enforced by the developer, and all principal and sub-contractors; • at locations where slow moving abnormal load traffic is considered likely to cause a road hazard it is recommended that escorted traffic is complemented by advance publicity and temporary signage where necessary; • wheel washing is proposed in the vicinity of the site compound to reduce the risk of transferring any mud onto the road and to suppress any dust; • all site vehicles will be parked off-road and as discretely as possible; • preparation and implementation of a Detailed Access Strategy to mitigate any potential conflict between site traffic during construction and the local path network; • once final loads and transport configurations are known, an updated review of maximum axle loadings on structures along the access routes; • similarly, an updated review of clear heights; • confirmation that there are no roadworks or closures that could affect the passage of the loads; • confirmation that there are no underground services on the access route that would be at risk from any abnormal loads; and • confirmation that the relevant Police / escort authorities are satisfied with the route being used and that the appropriate roads authorities have been further contacted regarding the proposed loads and route. 	Construction

Environmental Subject Area	Environmental Commitment	Timing
	It is also recommended that a trial run be undertaken prior to delivery of abnormal loads, using the proposed load trailer and a scaffold to represent the load dimensions to confirm that the loads can be safely accommodated.	Construction (Pre-operation)
Mitigation and monitoring measures for decommissioning phase	The mitigation measures set out for the construction phase will also be implemented, where relevant, during the decommissioning stage of the Revised Development.	Decommissioning
Socio-Economics, Tourism and Recreation		
Local community and economy	The Applicant is committed to a local supplier approach and operates a Responsible Contracting Policy.	Pre-construction and Operation
	The Applicant has committed to providing annual community benefit funding of £5,000/MW of installed capacity and the mechanism to disperse the community benefit funding is to be agreed with SLC and local communities prior to commencement.	Operation
	The Applicant is also proposing the delivery of a Detailed Access Strategy, including a Heritage Tail, with interpretation areas informed by community consultation.	Operation
Aviation, Radar and Telecommunications		
Radar	There exists an agreed and contracted radar mitigation scheme to remove the identified impacts on the Lowther Hill and Cumbernauld radars and maintain a full air picture to enable NATS to continue to provide its service effectively and safely. This contract will be amended to reflect the change to the Revised Development from the Consented Development at the site.	Pre-construction
Aviation Lighting	The MoD has requested that aviation lighting be fitted to some wind farms in this area because of their location within the Tactical Training Area, including the Consented Development at the site. In the expectation that the MoD will make the same request for aviation lighting, this will be provided in accordance with their specified requirements.	Construction and Operation
Shadow Flicker		
Mitigation during operation	In order to ensure that potential shadow flicker effects do not exceed acceptable limits at any property, the Applicant proposes that prior to the erection of the first turbine a written scheme (known as the 'Wind Farm Shadow Flicker Protocol') shall be submitted to and approved in writing by SLC. This would set out mitigation measures to alleviate shadow flicker attributable to the Revised Development if required, as well as a protocol for addressing any complaints received from receptors within the study	Pre-Operation

Environmental Subject Area	Environmental Commitment	Timing
	area. Operation of the turbines would require to take place in accordance with the approved Shadow Flicker Protocol and any mitigation measures that have been agreed through the protocol would require to be implemented as appropriate.	

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