

**Creag Dhubh to Dalmally 275kV Connection**  
**Environmental Impact Assessment**  
**Volume 4 | Appendix 6.3**

**Outline Habitat Management Plan**

**April 2022**



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## List of Abbreviations

6.1.1	ABC	Argyll and Bute Council
6.1.2	ECoW	Ecological Clerk of Works
6.1.3	EIAR	Environmental Impact Assessment Report
6.1.4	CEMP	Construction Environmental Management Plan
6.1.5	GEMP	General Environmental Management Plans
6.1.6	HMP	Habitat Management Plan
6.1.7	NS	NatureScot
6.1.8	OHMP	Outline Habitat Management Plan
6.1.9	PMP	Peat Management Plan
6.1.10	SEPA	Scottish Environment Protection Agency
6.1.11	SISI	Scottish Invasive Species Initiative
6.1.12	SNH	Scottish Natural Heritage
6.1.13	SPP	Species Protection Plan

## TECHNICAL APPENDIX 6.3: OUTLINE HABITAT MANAGEMENT PLAN

### 6.1 Introduction

- 6.1.1 This Outline Habitat Management Plan (OHMP) sets out the proposed measures for habitat restoration and enhancement within the field survey area and the Biodiversity Study Area. The field survey area<sup>1</sup> is shown on **Figure 6.2: Phase 1 Habitats (EIAR Volume 3a)**.
- 6.1.2 The field survey area is dominated by coniferous woodland plantation, wet modified bog and semi-improved acid grassland, as shown on **Figure 6.2: Phase 1 Habitats (EIAR Volume 3a)**. Significant effects are predicted on peatlands (particularly wet heath and flushes) from habitat loss and degradation as part of the Proposed Development. Mitigation is required to restore poor quality and inactive areas of peatland habitat, as discussed in **Chapter 6: Biodiversity (EIAR Volume 2)**. The conditions in the field survey area are favourable for the active regeneration of peatland habitats as most of the field survey area shows signs of past drainage and grazing, with the majority of peatland areas being drier and modified.
- 6.1.3 Compensatory woodland planting would also be required to mitigate for the loss of woodland, particularly Ancient Woodland, as detailed in **Chapter 6: Biodiversity** and **Chapter 11: Forestry (EIAR Volume 2)** and the associated Technical Appendices (TAs).
- 6.1.4 This OHMP will be considered and adapted in relation to Biodiversity Net Gain (BNG) calculations and requirements for the Proposed Development. The BNG assessment is being completed post submission of the s37 application. A final Habitat Management Plan (HMP), which would include specific prescriptions and confirmation of peatland restoration and compensatory woodland planting, would be agreed with Argyll and Bute Council (ABC), other relevant stakeholders and with landowners. Peatland restoration would be confirmed prior to the commencement of construction of the Proposed Development. Compensatory woodland planting would be addressed as part of the compensatory planting requirements detailed in **Technical Appendix (TA) 11.3: Compensatory Planting Management Strategy (EIAR Volume 4)**.

### 6.2 Objectives of Outline Habitat Management Plan

- 6.2.1 This OHMP has been completed following best practice guidance from NatureScot (NS)<sup>2</sup>. The outline proposals of the plan, which are subject to the necessary permissions and licences being in place, are:
- To restore and enhance a minimum of 9.26 ha of peatland habitat within the field survey area and/or suitable surrounding areas. This area (9.26 ha) includes the amount of wet heath and flushes being permanently and temporarily lost and degraded as a result of the Proposed Development (1.18 ha) and, as a good practice measure, it also includes the amount of blanket bog being temporarily lost and degraded and the area of wet modified bog being permanently and temporarily lost and degraded as a result of the Proposed Development (8.08 ha). The restoration and enhancement of a comparable area is intended to offset both the permanent and temporary loss or degradation and,

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<sup>1</sup> The field survey area extended to 250 m beyond the Proposed Development on each side and included the 200 m Limit of Deviation (LOD) of the proposed 275 kV Overhead Line (OHL) alignment (100 m on either side of the proposed OHL). Field surveys were also undertaken outwith this area where there was potential for an impact upon a feature to occur, e.g. up to 50 m on either side of access tracks.

<sup>2</sup> Scottish Natural Heritage (previously SNH, now NS) (2016), *Planning for Development: What to Consider and Include in Habitat Management Plans*. Available: <https://www.nature.scot/sites/default/files/2019-01/Guidance%20-%20Planning%20for%20development%20-%20-%20What%20to%20consider%20and%20include%20in%20Habitat%20Management%20Plans.pdf> [24th January 2022].

where possible, a larger area of peatland would be restored than the area lost or degraded. This would increase the quality and extent of an Annex I habitat<sup>3</sup> and compensate for habitat loss and modification incurred as a result of the Proposed Development.

- To compensate for woodland habitat loss through compensatory planting of a minimum of 18.17 ha of broadleaved woodland. This would compensate for the loss of semi-natural broadleaved woodland incurred as a result of the Proposed Development. This compensatory planting would also compensate for the area of Ancient Woodland lost as a result of the Proposed Development, though it would not replace it with a like-for-like habitat since Ancient Woodland is irreplaceable<sup>4</sup>.
- To seek to further enhance the field survey area, where possible, through the use of artificial pine marten *Martes martes* den boxes, the creation of artificial refugia for reptiles and amphibians, and the control of American mink *Neogale vison*.
- To seek to enhance the habitat within the operational corridor (OC) of the Proposed Development through the creation of wildflower-rich and scrub habitats, where possible, facilitating the connection of existing habitats as well as supporting insect pollinators and other wildlife. In addition, this would increase the biodiversity value of the habitat (within the OC) and contribute positively to Biodiversity Net Gain (BNG)<sup>5</sup>.

6.2.2 The implementation of the final HMP would also take into account the existing land management practices undertaken on the site and would work in tandem with these practices.

6.2.3 The design and implementation of the final HMP would be managed by the Applicant in consultation and agreement with landowners and statutory consultees. Detailed method statements would be developed for the specific measures of the final HMP.

### 6.3 Peatland Restoration

6.3.1 Suitable areas for peatland restoration comprise modified habitat containing eroding channels suitable for damming, infilling and reprofiling. Three potential habitat restoration areas have been identified within the wayleave of the Proposed Development that could be used for peatland habitat restoration, as shown on **Figure 10.2.1 (EIAR Volume 3a)** in **TA 10.2: Outline Peat Management Plan (EIAR Volume 4)**. The extent of the peatland restoration areas would be subject to refinement prior to completion of the final HMP but the area identified for restoration would aim to restore an area of at least the same size as the area lost and degraded as a result of the Proposed Development. Ideally, there would be an overall increase of improved peatland habitat in the field survey area.

6.3.2 Peat management and reinstatement during and following construction are detailed in the outline Construction Environmental Management Plan (CEMP) and the outline Peat Management Plan (PMP) in **TA 2.2** and **TA 10.2 (EIAR Volume 4)**, respectively.

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<sup>3</sup> EC Directive on the Conservation of Natural Habitats and Wild Flora and Fauna (1992):

[http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm) [17th August 2021].

<sup>4</sup> The complex biodiversity of ancient woods has accumulated over hundreds of years, and therefore cannot be replaced. Many species that thrive in Ancient Woodland are slow to colonise new areas. All Ancient Woodlands are unique, and are distinctive of their locality.

<sup>5</sup> This OHMP will be considered and adapted in relation to future BNG calculations and requirements for the Proposed Development.

## Management Prescriptions

6.3.3 The Applicant would intend to follow the approach and principles implemented in NS's Peatland Action<sup>6</sup> Project to deliver peatland restoration, albeit with site-specific measures to work with landowners in developing and delivering successful restoration actions. The following measures are likely to form part of a peatland restoration project to encourage the active regeneration of degraded peatland, with reference to **TA 10.2: Outline Peat Management Plan (EIAR Volume 4)** for peat and mineral soil handling methods:

- Raise the water table by blocking channels and gullies to prevent the drainage of water from bog areas. Peat excavated as a result of the Proposed Development could potentially be used where it is not required for reinstatement. Peat for restoration would need to be removed in such a way as to ensure that catotelmic (lower level, non-living layers of peat) and acrotelmic (surface living layer of peat) are removed and stored separately. A survey would be carried out prior to blocking to confirm the number, location and spacing of artificial dams required. Peatland restoration measures would be subject to refinement in consideration with current best practice techniques<sup>7</sup> and expert knowledge gathered from other projects. Restoration work would be undertaken in line with Species Protection Plans (SPPs) and General Environmental Management Plans (GEMPs), according to agreed methodologies and with guidance and supervision from a suitably experienced Ecological Clerk of Works (ECoW).
- Increase the abundance and distribution of bog-moss *Sphagnum sp.* and other bog species. If suitable habitat conditions are recreated, this should occur through natural regeneration. However, active measures would be considered in the unlikely event that natural regeneration is unsuccessful.
- Increase the abundance and distribution of other bog species, such as cottongrass *Eriophorum sp.* and cross-leaved heath *Erica tetralix*. If suitable habitat conditions are recreated, this should occur through natural regeneration. However, active measures would be considered in the unlikely event that natural regeneration is unsuccessful.
- Manage grazing pressure in restored areas through fencing and/or a reduction in deer or sheep/cattle numbers, as agreed with the landowners.

## 6.4 Compensatory Woodland Planting

6.4.1 All compensatory woodland planting would be undertaken as discussed in **TA 11.3: Compensatory Planting Management Strategy (EIAR Volume 4)**. The extent of these planting areas would be subject to refinement prior to completion of the final HMP but the area identified for restoration would be no less than 18.17 ha<sup>8</sup>, which is the area of Ancient Woodland and semi-natural broadleaved woodland to be felled as a result of the Proposed Development, as discussed in **Chapter 6: Biodiversity** and **Chapter 11: Forestry (EIAR Volume 2)**. Compensatory planting for the area of coniferous woodland felled (49.49 ha) is not included within this OHMP but is detailed in **Chapter 11: Forestry (EIAR Volume 2)** and

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<sup>6</sup> NS (2022), *Peatland ACTION – Project Resources*. Available at: <https://www.nature.scot/climate-change/nature-based-solutions/peatland-action/peatland-action-project-resources> [25th April 2022].

<sup>7</sup> SNH (2019), *Peatland ACTION Guidance for Land Managers: Dam Installation Techniques – Peat and Plastic Dams*. Available: <https://www.nature.scot/sites/default/files/2019-03/Guidance-Peatland-Action-installing-peat-dams.pdf> [24th January 2022].

<sup>8</sup> Chapter 11: Forestry only considers the direct loss of Ancient Woodland, whereas Chapter 6: Biodiversity considers direct and indirect loss of Ancient Woodland but also the direct and indirect loss of non-designated broadleaved woodland. This has resulted in a compensatory planting area that is higher than the area of woodland loss considered in the forestry chapter (18.17 ha compared to 10.36 ha). The biodiversity chapter incorporates the worst-case scenario of all Ancient Woodland and non-designated broadleaved woodland loss.

**TA 11.3: Compensatory Planting Management Strategy (EIAR Volume 4).** Planting would aim to restore an area of at least the same size as the area lost as a result of the Proposed Development. Ideally, there would be an overall gain of improved woodland habitat in the Biodiversity Study Area.

## Management Prescriptions

6.4.2 The following measures would be undertaken to compensate for the woodland lost as a result of the Proposed Development in order to provide woodland that is of a higher ecological value than the woodland removed from the field survey area:

- Where possible, replanting areas would incorporate semi-natural broadleaved woodland and mixed woodland, instead of coniferous woodland plantation. Broadleaved woodland would include species such as sessile oak *Quercus petraea*, silver birch *Betula pendula*, downy birch *B. pubescens* and alder *Alnus glutinosa*, which were recorded in the field survey area. Where possible, mixed areas would be planted and include the aforementioned broadleaved species plus species such as Scots pine *Pinus sylvestris*.
- Woodland creation, excluding riparian planting, would follow Forestry Commission Scotland Bulletin Guidance<sup>9</sup>. Planting densities would be between 200 and 400 stems per hectare in blocks rather than narrow strips. Individual tree species should be planted in groups, with trees planted a minimum of 2 m apart. However, these planting guidelines would be dictated by the character of the site and can be used flexibly. Woodland planting would take place in agreement with landowners. Planting would not take place in frozen or waterlogged ground. Where possible, new woodland would be planted next to an existing woodland, particularly other areas of Ancient Woodland, as larger areas support more species and the existing woodland would provide a source for the natural colonisation of ground flora in the new woodland. New woodland should contain equal proportions of trees and shrubs, such as hawthorn *Crataegus monogyna*, willow *Salix sp.* and elder *Sambucus nigra*, to provide a diverse habitat structure and increase the ecological value. If the new woodland area is larger than 2 ha, approximately 20-30% of the area would be left unplanted to form open glades and rides within the woodland. Rides should be at least as wide as the height of the surrounding trees once they reach maturity. Tree shelters/guards or fencing would be used to protect immature trees from grazing.
- The applicant would seek to gain landowner agreements to undertake riparian planting (e.g. of birch, alder and willow species, such as goat willow *Salix caprea* and eared willow *S. aurita*) along watercourses, such as the Cladich River, Allt Fearnna and Teatle water, and their tributaries. This would have the added benefit of providing shelter for fish, aquatic invertebrates and otter *Lutra lutra*. Riparian woodland acts as corridors to enhance connectivity by creating links within and between woodland habitats, providing routes for dispersing or migrating mammals, such as otter as well as foraging or commuting bats. Trees help prevent bank erosion and give shelter and shade for salmonid fish. Riparian vegetation also increases biodiversity and provides habitat for water vole *Arvicola amphibius*. The creation and management of riparian vegetation would follow the Scottish Environment Protection Agency (SEPA) good practice guide<sup>10</sup>.

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<sup>9</sup> Rodwell, J.S. and Patterson, G.S. (1994), *Creating New Native Woodlands*. Forestry Commission Bulletin 112. Her Majesty's Stationary Office, London.

<sup>10</sup> SEPA (2009), *Engineering in the Water Environment Good Practice Guide: Riparian Vegetation Management*. Second edition. WAT-SG-44.

## 6.5 Enhancement Measures

### Pine Marten

6.5.1 Pine marten are often forced to build dens in man-made structures or in marginal habitats, such as scrub and heath, in response to a lack of other denning opportunities in the human-influenced landscape<sup>11</sup>. In the short-term, the use of artificial den boxes may mitigate the main source of human conflict with this species and encourage breeding success in areas where pine martens are known to be present. A moderate level of pine marten activity was recorded in the field survey area through the presence of potential dens, shelters and scat. As such, an opportunity for enhancement exists through the deployment of den boxes within the coniferous woodland plantation in the field survey area.

#### *Management Prescriptions*

6.5.2 The following measures would be undertaken to enhance the coniferous woodland plantation for use by pine marten:

- The Applicant would explore opportunities with landowners to identify suitable locations to erect pine marten boxes and would seek to install at least four den boxes. Installation would follow good practice guidance<sup>12</sup>, with the boxes installed in areas of long-term woodland retention away from public roads. Each box would be fitted to a tree at a minimum height of 4 m to avoid disturbance.

### Reptiles and Amphibians

6.5.3 Common lizard *Zootoca vivipara*, common frog *Rana temporaria* and common toad *Bufo bufo* were all recorded in the field survey area. Tree felling for the Proposed Development is also likely to provide more open habitats for these species. As a result, an opportunity for enhancement exists through the creation of artificial refugia from the brash present after felling.

#### *Management Prescriptions*

6.5.4 The following measures would be undertaken within the OC, subject to landowner and other stakeholder agreement, to encourage the use of suitable habitats by reptiles and amphibians:

- The Applicant would seek to create five rock piles in peatland habitat and felled areas to attract common lizard by providing shelter and an area for basking. The piles would be scattered throughout the habitat and created using a variety of rock sizes, including larger flat rocks for basking. They would be placed in open, sunny locations.
- The Applicant would seek to create six artificial refugia for amphibians and invertebrates by building small piles of deadwood from the brash created by felling. The refugia would be a minimum of 1 m wide and 50 cm high.

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<sup>11</sup> Twining, J.P., Montgomery, W.I., Reid, N., Marks, N., Tosh, D.G. and Scantlebury, D.M. (2020), *All Forests are not Equal: Population Demographics and Denning Behaviour of a Recovering Small Carnivore in Human Modified Landscapes*. Wildlife Biology (4).

<sup>12</sup> Croose, E., Birks, J.D.S and Martin, J. (2016), *Den Boxes as a Tool for Pine Marten Martes martes Conservation and Population Monitoring in a Commercial Forest in Scotland*. Conservation Evidence (13), pp. 57-61.



## American Mink

- 6.5.5 American mink are a non-native invasive species that first became established in the UK in the 1930s when animals escaped from fur farms<sup>13</sup>. The species is an introduced predator that has an adverse effect on native wildlife, particularly water vole and ground-nesting birds. American mink may also result in salmonid mortality in some river systems<sup>14</sup>.
- 6.5.6 American mink scat was recorded on a tributary of the River Cladich and on the Allt Fearnna. As a result, an opportunity for enhancement exists through mink control to encourage water vole population expansion with the removal of this introduced predator.

### *Management Prescriptions*

- 6.5.7 The Applicant would investigate the feasibility of undertaking American mink control activities and, where possible, the following measures would be undertaken to control American mink and encourage water vole on the tributaries of the River Cladich and the Allt Fearnna:
- The installation of a mink monitoring raft on the tributaries of the River Cladich and the Allt Fearnna, such as those provided by the Scottish Invasive Species Initiative (SISI)<sup>15</sup>. The rafts would be deployed on the edge of the tributaries so they float close to the banks. The rafts can be installed anywhere on the tributaries where they occur within the field survey area. The rafts are used to confirm the presence of mink with a wooden tunnel containing a clay pad to capture footprints.
  - As soon as American mink are confirmed to be present from mink footprints in the clay pad, a live capture trap would be installed in the rafts' tunnels, replacing the clay pads<sup>16</sup>. Any mink captured in the live traps would be culled humanly. This would be done by a suitably qualified person. Any other species captured in the trap, such as voles or mice, would be released unharmed.

## Wildflower and Scrub Corridor

- 6.5.8 An opportunity exists to enhance the habitat within the OC of the Proposed Development through the creation of wildflower-rich and scrub habitats, facilitating the connection of existing habitats as well as supporting insect pollinators and other wildlife. All wildflower and scrub planting would be undertaken at locations to be confirmed post-consent and in discussion with the landowner. The extent of these planting areas would be subject to refinement prior to completion of the final HMP. The confirmed planting areas would be shown on a figure in the final HMP.

### *Management Prescriptions*

- 6.5.9 The following measures would be undertaken to enhance the OC where felling and vegetation clearance has occurred as part of the Proposed Development:
- The species of scrub and wildflower to be planted, any required ground preparation and maintenance, and the suitability of the OC would be determined by further ground investigation in year 1 of the implementation of the final HMP. Scrub species to be planted would include species already present

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<sup>13</sup> NS (2020), *American Mink*. Available: <https://www.nature.scot/plants-animals-and-fungi/mammals/land-mammals/american-mink> [25th January 2022].

<sup>14</sup> *Ibid.*

<sup>15</sup> SISI (2020), *Mink Control Project*. Available: <https://www.invasivespecies.scot/mink-control-project> [25th January 2022].

<sup>16</sup> SISI (2020), *Mink Control Project*. Available: <https://www.invasivespecies.scot/mink-control-project> [25th January 2022].

in the field survey area, such as downy birch, rowan *Sorbus aucuparia*, eared willow, grey willow *Salix cinerea* and goat willow, supplemented by further species such as elder and hawthorn. Scrub planting would take place in agreement with the landowner and where it would not affect the safe operation and maintenance of the overhead line. Where possible, species would be sourced locally. Scrub creation would follow Forestry Commission Scotland Bulletin Guidance<sup>17</sup> and would aim to provide habitat connectivity between areas of unfelled woodland across the OC.

- Seeding of the OC with a native wildflower seed mix in areas of scrub planting would also occur to provide an additional foraging resource for pollinating bees and other insects. Seeding would be undertaken in autumn as winter conditions are a requisite for seed germination. Suitable native seed would be obtained from a local supplier that can supply species of local provenance, where possible. Species to be seeded would include species already present in the field survey area, such as meadow buttercup *Ranunculus acris*, tormentil *Potentilla erecta*, heath bedstraw *Galium saxatile*, bluebell *Hyacinthoides non-scripta*, white clover *Trifolium repens*, common bird's-foot-trefoil *Lotus corniculatus*, thyme-leaved speedwell *Veronica serpyllifolia*, cuckoo flower *Cardamine pratensis* and bugle *Ajuga reptans*.

## 6.6 Work Programme

- 6.6.1 A detailed HMP delivery programme would be developed in consultation with ABC and the landowners as part of the development of the final HMP.

## 6.7 Funding and Duration

- 6.7.1 The final HMP and implementation would be funded by the Applicant and the duration of the HMP would be confirmed in consultation with ABC and NS. Management agreements for habitat enhancement would be established with landowners and other stakeholders in line with best practice.

## 6.8 Monitoring

### Peatland Restoration

- 6.8.1 Monitoring activities would be undertaken using a similar approach to that used for NS's Peatland Action programme<sup>18</sup>. Vegetation surveys would be undertaken by suitably qualified ecologists to monitor the success of peatland restoration and highlight the need for any further management measures. Surveys would collect data on the structure and composition of the vegetation, and plant species abundance and diversity from permanent quadrats in the restored areas. A site-specific monitoring schedule would be established as part of the peatland restoration project.

### Compensatory Woodland Planting

- 6.8.2 New areas of woodland would require monitoring and management, particularly in the first 2-3 years when immature trees are establishing. New trees would be inspected once a year to ensure they are not being choked by other vegetation, such as grass species, until tree shelters/guards are removed. Tree guards

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<sup>17</sup> Rodwell, J.S. and Patterson, G.S. (1994), *Creating New Native Woodlands*. Forestry Commission Bulletin 112. Her Majesty's Stationary Office, London.

<sup>18</sup> NS (2022), *Peatland ACTION – Project Resources*. Available at: <https://www.nature.scot/climate-change/nature-based-solutions/peatland-action/peatland-action-project-resources> [25th April 2022].

would be removed when the base of the tree reaches 7-10 cm in diameter, typically 3-5 years after planting. If more than 25% of planted trees in an area of new woodland have failed, additional planting would be required.

- 6.8.3 Long-term management of new woodland areas would be undertaken by landowners in consultation with the relevant statutory authority, where required. Management may include deer control, selective thinning, replanting, rotational mowing to maintain open rides and glades, and the control of invasive non-native species, such as rhododendron *Rhododendron ponticum*.

### Pine Marten Den Boxes

- 6.8.4 A monitoring programme will be developed in consultation with relevant stakeholders for Pine marten den boxes as part of the final HMP. Monitoring activities would be undertaken by a suitably qualified ecological professional under licence from NS. Monitoring is advised to occur in once per year in May, when breeding females are occupying natal den sites with their dependent kits. Boxes would initially be checked for signs of use by observing them from a distance using binoculars. Following an initial inspection, a licensed surveyor would access the box using a ladder.

### American Mink

- 6.8.5 As part of investigating the feasibility of undertaking American mink control, a monitoring programme would be developed that would apply similar methods as undertaken by existing projects (e.g. SISI<sup>19</sup>). These would be expected to include; checking for American mink footprints (via monitoring rafts) every one to two weeks, for the first year post-construction. If signs of mink are found, a live capture trap is installed, the rafts would be checked daily for captured mink.

### Wildflower and Scrub Corridor

- 6.8.6 Vegetation surveys undertaken by suitably qualified ecological professionals would monitor the success of the wildflower and scrub corridor and highlight the need for any further management measures. Surveys would collect data on the structure and composition of the vegetation, and plant species abundance and diversity from permanent quadrats in the enhanced areas. The success or failure of scrub planting would be noted during each survey. If more than 25% of new scrub has failed, additional planting would be required. Monitoring would commence in summer of year 1 of the implementation of the final HMP (during the first year of operation of the Proposed Development) and would be repeated up to 5 years, after which new woodland/scrub habitats are considered to become established.

### Summary

- 6.8.7 The methodology and reporting timeframes for all monitoring surveys would be detailed in the final HMP. Reports would highlight the management measures completed to date, the results of the surveys and any measures proposed for the next reporting period. The results would be regularly reviewed by the HMP management team, in consultation with the landowners, to ensure the HMP objectives are being met and to determine any appropriate amendments, where practicable.

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<sup>19</sup> <https://www.invasivespecies.scot/?msckid=abc3c1c1c63d11ec84ee1b324473487e>

## 6.9 Amendments

- 6.9.1 The final HMP would be a live document and would be updated following monitoring results, unexpected events or changes in guidance.