



MacArthur  
Green

# Blair Hill Wind Farm

## Outline Biodiversity Enhancement Management Plan

### Technical Appendix 8.6

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**Tel:** 0141 342 5404

**Web:** [www.macarthurgreen.com](http://www.macarthurgreen.com)

**Address:** 93 South Woodside Road | Glasgow | G20 6NT

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## CONTENTS

1	INTRODUCTION .....	1
1.1	Target Habitats and Species.....	1
1.2	Finalisation of the BEMP and Reporting.....	1
2	EXISTING CONDITIONS & SUMMARY OF ECOLOGICAL IMPACT ASSESSMENT.....	2
3	BIODIVERSITY NET GAIN .....	3
4	BIODIVERSITY ENHANCEMENT AREA .....	4
4.1	Overview .....	4
4.2	Unit A – Peatland Restoration/Enhancement .....	5
4.3	Unit B – Peatland Restoration/Enhancement & Acid Grassland Restoration.....	6
4.4	Unit C – Acid Grassland Restoration .....	6
4.5	Unit D – Riparian Broadleaved Woodland Creation.....	7
4.6	Unit E – Native Broadleaved Woodland Creation (Conifer Replacement) .....	7
4.7	Unit F – Living Green Roof.....	8
5	AIMS, OBJECTIVES AND MANAGEMENT PRESCRIPTIONS.....	8
5.1	Aim 1: Restore & enhance peatland habitat and improve bog and wet heath condition (Units A & B).....	8
5.2	Aim 2: Restore acid grassland habitats (Units B and C).....	10
5.3	Aim 3: Create and expand native broadleaved woodland cover (Units D and E) .....	10
5.4	Aim 4: Living Green Roof Creation (Unit F) .....	11
6	BIODIVERSITY NET GAIN ASSESSMENT.....	11
6.1	Overview .....	11
6.2	BNG Assessment Results.....	12
7	MONITORING .....	15
7.1	Aim 1: Restore & enhance peatland habitat and improve bog and wet heath condition (Units A & B).....	15
7.2	Aim 2: Restore acid grassland habitats (Units B and C).....	16
7.3	Aim 3: Create and expand native broadleaved woodland cover (Units D and E) .....	16
7.4	Aim 4: Green Roof Creation (Unit F) .....	16
8	REPORTING & BEMP REVIEW.....	17
9	OFF-SITE FINANCIAL CONTRIBUTION TO BIODIVERSITY ENHANCEMENT .....	17
10	CONCLUSION .....	17
	ANNEX A. MANAGEMENT AND MONITORING TIMETABLE.....	18

### LIST OF TABLES

Table 6-1: Biodiversity Unit Change at each Stage of Development .....	14
Table A-1 Indicative Management and Monitoring Timetable .....	18

### LIST OF FIGURES

Figure 8.16: Outline Biodiversity Enhancement Management Plan Area	
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## 1 INTRODUCTION

This Outline Biodiversity Enhancement Management Plan (OBEMP) describes the proposed habitat and conservation management measures in relation to Blair Hill Wind Farm (hereafter referred to as the 'Proposed Development').

This OBEMP is set out in the following sections:

- Existing Conditions & Summary of the Ecological Impact Assessment;
- Biodiversity Net Gain (BNG);
- Biodiversity Enhancement Area;
- Aims, Objectives and Management Prescriptions;
- BNG Assessment;
- Monitoring;
- Reporting and BEMP Review; and
- Management and Monitoring Timetable.

### 1.1 Target Habitats and Species

The management recommendations within this OBEMP are informed by baseline ecological surveys undertaken for the Proposed Development and the findings of **Chapter 8: Ecology** of the Environmental Impact Assessment Report (EIAR) completed for the Proposed Development. The main habitats considered in this OBEMP are peatland habitats (including blanket bog/modified bog and wet heath), broadleaved woodland, and acid grassland. The habitat enhancements proposed within this OBEMP would also generally have beneficial effects for the local bird assemblage (details of the bird assemblage are provided in **Chapter 9: Ornithology**).

The measures detailed within this OBEMP aim to achieve significant biodiversity enhancement at the Site, in line with objectives outlined in National Planning Framework 4 (NPF4) Policy 3<sup>1</sup>. A BNG metric is utilised to demonstrate that the measures proposed for the creation and restoration/enhancement of habitats at the Proposed Development would fully compensate for predicted habitat and biodiversity losses, and provide further enhancement that would result in an increase and net gain for biodiversity of **+29%** over and above the baseline and pre-development value of the Site post-construction and following implementation of the OBEMP.

### 1.2 Finalisation of the BEMP and Reporting

This OBEMP is based on several identified land parcels or 'Units' (Units A - F; see **Figure 8.16**) for each respective habitat management and biodiversity enhancement proposal. These Units were identified through discussions with the Applicant, landowners, and relevant technical specialists to create and enhance habitats of biodiversity value. The Units may be refined following further specialist surveys and feedback from relevant consultees, and other biodiversity enhancement

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<sup>1</sup> Scottish Government (2023). National Planning Framework 4. Available at: <https://www.gov.scot/publications/national-planning-framework-4/> [Accessed September 2024].

search areas and/or proposals may also be considered; however, the Applicant remains committed to delivering significant biodiversity enhancement at the Proposed Development.

The OBEMP will be refined and developed into a final BEMP post-consent. The final BEMP will confirm the overarching Biodiversity Enhancement Area (BEA) encompassing all habitat management proposals, and any finalised management units (i.e., the refined Units for specific habitat management proposals) therein, where the aims, objectives and management prescriptions will apply. The final BEMP will be agreed with Dumfries and Galloway Council (DGC) in consultation with NatureScot prior to the commencement of construction of the Proposed Development.

A Biodiversity Management Group (BMG) will oversee and monitor the implementation of the agreed BEMP. The BMG should include representatives from DGC, NatureScot and the wind farm owner.

A BEMP report (initially for operational Years 1, 3 and 5) will be submitted by the wind farm owner to the BMG detailing the tasks (management and monitoring) completed over the last year(s) and those planned for the year(s) ahead, including relevant monitoring results, analysis and discussion (see **Section 8**).

Management prescriptions in the BEMP may be amended following consideration of monitoring results to ensure progress towards the stated aims and objectives of the plan.

## **2 EXISTING CONDITIONS & SUMMARY OF ECOLOGICAL IMPACT ASSESSMENT**

The Site is set within a mixed landscape of upland rough pasture farmland, fragmented moorland and commercial conifer plantation forestry. The most common and prevalent habitat types within the Site are conifer plantation woodland, marshy grassland, wet modified bog, and wet heath (see **Appendix 8.1** and **Figure 8.3** of the EIAR).

The north of the Site is primarily agricultural, predominantly used for rough grazing for livestock. The grazing pattern is usually from first week of January with approximately 235 ewes put out; in late February that is reduced to approximately 135 ewes, then at the start of March the numbers are reduced further to approximately 20 ewes. In late March approximately 160 hoggs are put out for the whole summer, ewes and single lambs go back out mid-May (approximately 80 to 100). 30 cows and followers, plus one bull, are usually out from July until mid-September and then brought off. Ewes with twins (approximately 120) are put out late July and are back off mid-August to wean lambs. 235 ewes are then put back out until 10th of November when they then come in for tugging time until end of December, there is no stock on the hill at this point.

As per **Chapter 8: Ecology**, important ecological features (IEFs) scoped in to the ecological impact assessment comprise blanket bog/wet modified bog and commuting/foraging bats; no significant effects are predicted.

The Proposed Development could potentially directly impact up to 2.37 hectares (ha) of blanket bog/wet modified bog (1.56 ha of permanent direct loss and 0.81 ha of temporary direct loss) and potentially indirectly affect up to 2.72 ha of blanket bog/wet modified bog using indirect drainage assumptions (see **Chapter 8: Ecology**).

This OBEMP proposes measures that provide appropriate compensation and enhancement in cognisance of NatureScot guidance<sup>2</sup> with respect to the predicted effects on blanket bog/wet modified bog habitats, as well as other proposals to provide wider biodiversity enhancement in general.

Potential collision risk impacts to bats will be mitigated in accordance with the proposals detailed in **Chapter 8: Ecology**; however, several measures in this OBEMP will also create and enhance habitats and corridors for bats commuting and foraging (including creation of native woodland), and in the long-term potentially provide roost features.

The local bird assemblage is described in **Chapter 9: Ornithology**. Ornithological species scoped into the assessment comprise black grouse (*Tetrao tetrix*); no significant effects are predicted. Measures contained within this OBEMP will have secondary benefits for the local bird assemblage, including black grouse, through increasing available habitat and its suitability for nesting and foraging.

### 3 BIODIVERSITY NET GAIN

Biodiversity Net Gain (BNG) is a process which follows the principal of biodiversity enhancement and leaves nature in a better condition than before development work started. No Scotland-specific biodiversity metric is yet in existence, although one is proposed for development by the Scottish Government and NatureScot. However, as per below, the Scottish & Southern Energy Renewables (SSER) BNG Metric has been used here as an interim measure as it is considered the most appropriate available metric in the Scottish context.

SSER has developed a BNG toolkit<sup>3</sup> for use in Scotland based upon a version of the Natural England Biodiversity Metric<sup>4</sup> which aims to quantify biodiversity based upon the value of habitats for nature. It is a method for demonstrating whether development projects have been able to maintain or increase the biodiversity value of a development site after construction works. The SSER BNG toolkit has been utilised to undertake a preliminary BNG assessment for the Proposed Development and the measures proposed within this OBEMP.

The scope of the BNG assessment is to quantify the overall potential adverse and beneficial biodiversity impacts associated with the Proposed Development; this includes a biodiversity baseline assessment, analysis of habitat losses due to temporary works and permanent structures (e.g., tracks and hardstandings), and analysis of biodiversity gains following reinstatement of habitats in areas of temporary construction work and additional habitat enhancement and creation (whether onsite and/or offsite).

It is important to note that within the SSER, and other BNG metrics, that habitats negatively impacted and considered as ‘irreplaceable’ will require bespoke compensation and should be compensated for following national legislation, policy, and guidelines<sup>5</sup>. However, as per SSER guidance<sup>5</sup>, irreplaceable habitats, and compensation for them, should be included within the

<sup>2</sup> <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>

<sup>3</sup> <https://www.sserenewables.com/sustainability/biodiversity-net-gain/> [Accessed January 2025]

<sup>4</sup> Natural England (2022) The Biodiversity Metric 3.1.

<https://nepubprod.appspot.com/publication/5850908674228224>

<sup>5</sup> [https://www.sserenewables.com/media/izzjbehn/sser-bng-toolkit-user-guide\\_v2-2.pdf](https://www.sserenewables.com/media/izzjbehn/sser-bng-toolkit-user-guide_v2-2.pdf)

biodiversity unit calculations and included within the respective biodiversity toolkit. Inclusion of these areas within the BNG calculations and toolkit is required to provide a complete picture of all habitats present on-site. In line with SSER guidance<sup>5</sup>, for the Proposed Development, irreplaceable habitats comprise areas of active blanket bog in good condition. Compensation and enhancement relating to blanket bog habitats on-site is considered in cognisance of NatureScot guidance<sup>2</sup>.

The BNG assessment is based upon National Vegetation Classification (NVC) and habitat surveys (converted to Phase 1 habitat types for the purposes of the BNG toolkit) undertaken to inform the EIAR (**Appendix 8.1** and **Figure 8.3**).

## 4 BIODIVERSITY ENHANCEMENT AREA

### 4.1 Overview

This OBEMP proposes a BEA covering 248.66 ha, comprising six overarching Units (Units A – F; see **Figure 8.16**), each generally focussing on a particular habitat or feature type, within which management and monitoring works would be implemented. Habitat and biodiversity management and monitoring works would be undertaken within these respective Units. Details of each Unit are provided in **Sections 4.2 - 4.7** below.

The overall goal of the BEMP is to restore, enhance and create habitats of ecological value in these Units, which in turn will benefit existing flora and fauna as well as increase biodiversity in general.

This OBEMP also proposes and includes peatland restoration and enhancement measures. NatureScot guidance<sup>2</sup> suggests that effects on priority peatland habitats should be compensated in the order of 1:10 (lost:restored) with a further 10% restoration of the Site baseline extent of priority peatland habitats to deliver additional enhancement. As noted in **Section 2**, the Proposed Development could directly impact up to 2.37 ha of blanket bog/wet modified bog and potentially indirectly affect up to 2.72 ha of blanket bog/wet modified bog. Using NatureScot guidance<sup>2</sup> the compensation and enhancement requirements for priority peatland at the Proposed Development would be in the region of 63.19 ha if accounting for the full predicted and potential direct and indirect effects stated<sup>6</sup>. As discussed in **Chapter 8: Ecology**, indirect drainage effects are not certain, and if they do occur, are unlikely to be fully realised for various reasons. Consequently, it is considered that the 1:10 ratio should be more appropriately applied to the known direct permanent and temporary losses (N.B. current Scottish Government guidance<sup>7</sup> does not specify any ratios, instead taking a more holistic view regards biodiversity and a project/sites specific characteristics or circumstances). In this regard, the compensation and enhancement requirements for priority peatland at the Proposed Development would be in the region of 35.99 ha<sup>8</sup>.

Moorland and peatland restoration and enhancement measures below that will be applied to priority peatland habitats (i.e., M2, M17, M19, M20, and M25a on peat over 0.5 m in depth) in Units A and B cover up to approximately 84.81 ha, these same measures will also benefit up to a further

<sup>6</sup> i.e., 1:10 ratio: (2.37 ha + 2.72 ha) x 10 = 50.90 ha, plus 10% enhancement on the priority peatland baseline extent within the Site, which is 122.85 ha x 10% = 12.29 ha (122.85 ha being the baseline extent of blanket bog and wet modified bog within the Site – see **Chapter 8: Ecology, Table 8.11**).

<sup>7</sup> Scottish Government (2023). Biodiversity: draft planning guidance. <https://www.gov.scot/publications/scottish-government-draft-planning-guidance-biodiversity/pages/1/>

<sup>8</sup> i.e., (2.37 ha x 10) + 12.29 ha.



54.65 ha of non-priority peatland habitats (i.e., M15 and M25 on shallower peat); note the restoration/enhancement area values stated have excluded the areas of direct land take predicted for permanent and temporary infrastructure within Units A and B. Therefore, for predicted direct losses for permanent and temporary infrastructure, and potential indirect losses/modification, peatland restoration/enhancement proposals at the Proposed Development would be in exceedance of the 1:10 compensation ratio plus 10% enhancement in the order of 21.62 ha (or by 48.82 ha if only direct effects are considered).

The precise objectives and detailed management prescriptions for the finalised management units will depend on the current condition of the habitat and the existing factors acting upon it or contributing to current condition. In order to further inform the objectives and detail appropriate management prescriptions, further specific surveys and desk-based assessment may be required to develop the final BEMP. These surveys may include, but are not limited to, the following:

- Joint Nature Conservation Committee (JNCC) Common Standards Monitoring of Upland Habitats<sup>9</sup> or habitat condition assessments utilising the latest Biodiversity Metric<sup>10</sup> condition assessment pro-forma and methodology;
- Hydrology/ecology walkover to identify opportunities and specific locations for self-seeded non-native conifer removal, drain blocking, erosion feature restoration/reprofiling, and restoration of the peatland water table;
- Herbivore Impact Assessment (HIA); and
- GIS mapping exercises (e.g., density mapping of self-seeded non-native conifers).

#### 4.2 Unit A – Peatland Restoration/Enhancement

Unit A is 87.40 ha in area and is comprised of predominantly blanket bog (NVC communities M2, M17 and M19) and wet modified bog (NVC community M20) habitats, collectively covering 75.18 ha<sup>11</sup> (86%) of the Unit. The remainder of the area contains a mix of peaty-soil habitats (e.g. M15 wet heath and M6 flushes) and small patches of non-peaty-soil habitats, such as acid grassland.

Within Unit A, the aim is to enhance the existing and degraded peatland habitat. This aim would likely be fulfilled through stock exclusion/management, peat hagg reprofiling, drain blocking, and removal of self-seeding conifer trees. The largest impact on the peatland here is the long history of livestock grazing pressure (see results of the Peatland Condition Assessment (PCA) contained within **Technical Appendix 8.1** and **Figure 8.7**).

Unit A is centred around the area of Benailsa in the north of the Site and contains much of the Class 1 Peatland<sup>12</sup> within the Site (c.f. **Figure 8.2**). This area has been selected as a suitable candidate area for restoration and enhancement due to the presence of some peat erosional features and the evident negative impacts from livestock grazing highlighted by the predominance of NVC

<sup>9</sup> <https://jncc.gov.uk/our-work/common-standards-monitoring>

<sup>10</sup> <https://publications.naturalengland.org.uk/publication/6049804846366720>

<sup>11</sup> 72.88 ha when Proposed Development infrastructure is accounted for.

<sup>12</sup> <https://soils.environment.gov.scot/maps/thematic-maps/carbon-and-peatland-2016-map/>

community M20 (see **Technical Appendix 8.1** and associated PCA, and **Figure 8.3** and **Figure 8.7**). Following further assessment, other management prescriptions would be incorporated as appropriate and necessary, for example there are likely to be encroaching and invading self-seeded conifer trees due to the nearby forestry plantation seed sources. This OBEMP provides for the removal of self-seeded conifer trees from the Unit.

Peatlands are important for preventing and mitigating the effects of climate change, preserving biodiversity and minimising flood risk. The improvement of these habitats will also be of benefit to local flora and fauna, including the upland bird assemblage.

#### 4.3 Unit B – Peatland Restoration/Enhancement & Acid Grassland Restoration

Unit B is 101.39 ha in size and covers the land parcel of open ground in the south of the Site (**Figure 8.16**). The habitats here are a complex upland habitat mosaic, with much of the area comprised of dense U20 bracken, M15 wet heath, M25 marshy grassland, M25a^ wet modified bog and smaller more scattered areas of other typical habitats such as blanket bog, acid grassland and flushes. M15 and M25 on shallower peatland accounts for approximately 53.73 ha (53%) of Unit B, whereas bracken accounts for 27.45 ha (27%) of Unit B.

Proposed management measures in Unit B have two-fold aims. The first aim is the further restoration and enhancement of both priority and non-priority peatland habitats, in this regard the largest single management measure will be an extensive scheme of self-seeded conifer removal. The area contains a high density of self-seeded conifers of varying ages which are encroaching upon the open upland habitats from the nearby plantation areas (see **Technical Appendix 8.1** and **Figure 8.6** for further details and photographs).

The second aim within Unit B is acid grassland restoration through bracken removal and management. There are currently large areas of dense and continuous bracken within Unit B (**Figure 8.3**) that covers approximately 26.95 ha; dense bracken habitats are of negligible conservation value. The aim with respect to bracken areas will be to remove and control the bracken in order to allow the local acid grassland habitats to naturally regenerate and maintain this throughout the lifetime of the Proposed Development. The control of bracken will extend the amount of grassland present and improve the floral diversity of the area and increase wildflower cover for insects and pollinators, the replacement of tall dense bracken with open grassland habitats here may also create further lekking site opportunities for black grouse that are present locally (see **Figure 9.8**).

#### 4.4 Unit C – Acid Grassland Restoration

Unit C covers 23.32 ha of dense and continuous bracken. As above, these types of dense bracken habitats are generally of negligible conservation value. The aim within Unit C will be to remove and control the bracken in order to allow the local acid grassland habitats to naturally regenerate and maintain this throughout the lifetime of the Proposed Development. The control of bracken will improve the floral diversity of the area and increase wildflower cover for insects and pollinators.

#### 4.5 Unit D – Riparian Broadleaved Woodland Creation

Unit D covers 4.71 ha and is a riparian area along the Cordorcan Burn, comprising primarily of low conservation value marshy grassland, acid grassland and bracken habitats extending to around 3.69 ha, which are suitable for tree planting.

The aim within Unit D is to create a riparian area of semi-natural appearing broadleaved woodland in the long-term. The proposals in Unit D would generally involve management of bracken areas and the planting and establishment of a range of broadleaved species in non-uniform patterns and densities across all suitable habitats. The woodland and planting will largely aim to reflect the canopy composition of W4/W7/W11 NVC woodland types depending on the character and respective soil conditions throughout the Unit. There are no sensitive potential groundwater dependent terrestrial ecosystems (GWDTEs)<sup>13</sup> within Unit D, and as such it would generally all be suitable for planting; however, any small and localised patches of heath or bog habitat (covering approximately 1.02 ha) would not be planted and remain as retained open ground.

The creation of woodland has multiple beneficial biodiversity effects such as creating structure and new breeding, shelter and foraging habitats for a range of species, from terrestrial and aquatic invertebrates to birds, bats and fish. There are also many secondary benefits of woodland creation, such as natural flood attenuation, shade, carbon sequestration and helping to mitigate the effects of climate change.

Specifically, riparian planting would also improve the ecological quality of watercourses (e.g., through allochthonous material inputs, thermoregulation, erosion reduction), create shelter opportunities (e.g., for otter), establish improved habitat corridors (e.g., for bats) and provide shading to watercourses and a source of nutrient inputs and aiding in temperature regulation and cover for fish. The planting proposals across various Units would also benefit black grouse through enhanced shelter and foraging habitats and the connectivity of these locally.

#### 4.6 Unit E – Native Broadleaved Woodland Creation (Conifer Replacement)

Unit E is 36.73 ha in area and is split over two areas of commercial conifer plantation with some small patches of open ground and a waterbody (**Figure 8.16**). Conifer plantation accounts for approximately 33.41 ha (91%) of Unit E. The southern of these two areas borders the headwaters of the Glenshalloch Burn and also includes a mature pond. The pond contains fish and the combination of woodland edges with the pond was an area of high bat foraging activity (see **Technical Appendix 8.3** and **Figures 8.11 - 8.13**). The likely plantable area in Unit E extends to 33.20 ha (i.e., accounting for proposed infrastructure and higher conservation value habitats to be retained as open ground).

The aim within Unit E will be to replace the monoculture conifer plantations with more diverse and semi-natural broadleaved woodland to be retained long-term. The woodland and planting will largely aim to reflect the canopy composition of W4/W7/W11/W17 NVC woodland types depending on the character and respective soil conditions throughout the Unit; however, depending on the respective soil conditions present, other target NVC types may also be considered.

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<sup>13</sup> <https://forestry.gov.scot/publications/117-briefing-note-18-publication-of-gwdte-practice-guide>

The replacement of conifer plantation with native broadleaved woodland has beneficial biodiversity effects, through increasing species diversity, allowing light to penetrate the field layer and providing more natural and diverse breeding, shelter and foraging habitats for a range of species (from terrestrial invertebrates to birds and various mammal species). The proposals here and around the existing pond will also enhance the habitat for bats that use this area frequently. The planting proposals may also benefit black grouse which are present on the Site and locally through enhanced shelter and increased foraging resources.

#### 4.7 Unit F – Living Green Roof

Unit F will comprise the respective roofs of the control and welfare buildings within the substation compound. The incorporation of living green roofs here is in cognisance of NatureScot's Developing with Nature guidance<sup>14</sup>. The respective area of living green roof in total is indicatively 0.02 ha (or 191.4 m<sup>2</sup>) based on current design assumptions.

The living green roofs will provide a growing substrate in which a diverse mix of native grasses and wildflowers would be sown. Planting with a wide range of native species to support the greatest diversity of species will maximise the green roofs biodiversity potential. Living green roofs may be used by birds; however, their key benefit is increasing local floral diversity and providing key habitat for invertebrates and pollinators.

## 5 AIMS, OBJECTIVES AND MANAGEMENT PRESCRIPTIONS

The aims define the general BEMP goals, and the related objectives further define the aims into quantifiable targets. The management techniques and prescriptions outline the likely indicative management works to be implemented to achieve these aims and objectives. **Annex A** provides an indicative timetable for the implementation of the associated prescriptions.

As discussed in **Section 4.1**, detailed appropriate objectives and prescriptions will be developed post-survey for the final BEMP based on additional survey findings, consultation and in accordance with best practice. However, the experience gained from providing and delivering plans for similar sites and habitats would suggest that as an outline, the aims, objectives, techniques and prescriptions would likely include or be similar to the below.

### 5.1 Aim 1: Restore & enhance peatland habitat and improve bog and wet heath condition (Units A & B)

- |               |   |
|---------------|---|
| Objective 1.1 | Increase the abundance and distribution of major peat forming species, including <i>Sphagna</i> in bog areas.   |
| Objective 1.2 | Increase the abundance and structural diversity of dwarf shrubs such as <i>Calluna vulgaris</i> , <i>Erica tetralix</i> and <i>Vaccinium</i> spp. in line with local reference blanket bog and wet heath. |
| Objective 1.3 | Improve Moderate condition blanket bog to Good within 15 years and improve Poor condition modified bog to Moderate within 20 years.   |
| Objective 1.4 | Achieve Moderate condition wet heath within 15 years (Unit B only).   |

<sup>14</sup> <https://www.nature.scot/doc/developing-nature-guidance>

- Prescription 1.1 Following a review of livestock numbers and impacts during the pre-construction phase, periodically exclude livestock and/or manage livestock numbers and grazing regime via livestock fencing, stocking density manipulation, and timing of grazing within Unit A in agreement with the landowner to achieve Objectives 1.1 – 1.3.
- Prescription 1.2 Remove invading self-seeded conifer trees from Units A and B annually until a time that monitoring shows that regeneration is no longer an issue, or the frequency of intervention can be reduced.
- Prescription 1.3 Dam, reprofile, or wave dam/zipper any active drains<sup>15</sup> in Unit A (even if vegetated) as appropriate for the location specific drain in order that the water level is raised sufficiently and to restore natural flow paths to create conditions suitable for a range of blanket bog species, including the species mentioned within Objective 1.1. This should be carried out under the supervision of a suitably qualified Ecological Clerk of Works (ECoW). Methods as detailed within relevant guidance<sup>15, 16, 17</sup>.
- Prescription 1.4 Undertake peat hagg and gully restoration and peat surface re-profiling where appropriate in Unit A with a low-pressure excavator and in line with relevant guidance<sup>15, 17</sup>.
- Prescription 1.5 The following activities would be prohibited within Units A and B:
- clearing out of existing ditches;
  - supplementary feeding of livestock;
  - application of any insecticides, fungicides or molluscicides;
  - application of lime or any other substance to alter the soil acidity;
  - cutting or topping of vegetation except to control injurious weed species or to improve the biodiversity of the habitat;
  - burning of vegetation or other materials;
  - use of roll or chain-harrow;
  - planting trees;
  - carrying out any earth moving activities;
  - use of off-road vehicle activities with the exception of use of low scale agricultural vehicle movements (e.g., quad bike);
  - construction of tracks, roads, yards, hardstandings or any new structures (not associated with the Proposed Development); and
  - storage of materials or machinery.

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<sup>15</sup> According to methodology detailed in: Peatland Action (2024) Technical Compendium. Available at:

<https://www.nature.scot/doc/peatland-action-technical-compendium>

<sup>16</sup> NatureScot (2019). Peatland Action - Guidance for land managers - installing peat and plastic dams (<https://www.nature.scot/doc/peatland-action-guidance-land-managers-installing-peat-and-plastic-dams>)

<sup>17</sup> Thom, T., Hanlon, A., Lindsay, R., Richards, J., Stoneman, R. & Brooks, S. (2019). Conserving Bogs: The Management Handbook. (2nd Edition). (<https://www.iucn-uk-peatlandprogramme.org/resources/restoration-practice/conservation-handbook>)

## 5.2 Aim 2: Restore acid grassland habitats (Units B and C)

- Objective 2.1 Remove bracken coverage and halt further bracken establishment within Units B and C.
- Objective 2.2 Restore the grassland habitats within Units B and C to locally comparable acid grassland.
- Prescription 2.1 Mechanised and/or manual control and management of bracken following best practice<sup>18</sup>, with ongoing and repeated control where this is necessary.
- Prescription 2.2 Prohibited activities noted in Prescription 1.5 above apply.

## 5.3 Aim 3: Create and expand native broadleaved woodland cover (Units D and E)

- Objective 3.1 Create areas of native broadleaved woodland and increase tree diversity within and around the Site through the planting of up to 36.89 ha of new woodland (3.69 ha in Unit D and 33.20 ha in Unit E).
- Objective 3.2 Increase and enhance faunal diversity within and around the Site by providing more habitat structure and new breeding, shelter and foraging habitats for a range of birds, bats and other small mammals, and invertebrates.
- Prescription 3.1 Undertake new native riparian broadleaved woodland planting within Unit D and undertake the felling of the areas of conifer plantation within Unit E and replant with a diverse mix of native broadleaved species.
- Planting will be in non-uniform patterns and of variable densities and may include areas of retained open ground on advice from a professional forester to avoid woodland homogeneity. Planting in Unit E may be staggered to take account of felling plans. Planting will utilise low impact ground preparation techniques such as screening or inverted mounding<sup>19</sup>.
- Given the location, soils and prevailing baseline habitats of the proposed planting areas, and to reflect the character and structure of the existing broadleaved woodlands locally, it is anticipated that the species mixes here would primarily contain oak (*Quercus* spp.), birch (*Betula* spp.) and rowan (*Sorbus aucuparia*). However, it is proposed to increase diversity by also including smaller proportions of species such as aspen (*Populus tremula*), goat willow (*Salix caprea*), hawthorn (*Crataegus monogyna*), hazel (*Corylus avellana*), bird and/or wild cherry (*Prunus* spp.), crab apple (*Malus sylvestris*), small-leaved lime (*Tilia cordata*), wych elm (*Ulmus glabra*) and holly (*Ilex aquifolium*). Where there are damper soils the species mix would also include alder (*Alnus glutinosa*) and grey willow (*Salix cinerea*).
- Proportions of species and their planting locations would be determined by a forester, in agreement with a suitably qualified ecologist, during preparation of the final BEMP.
- Tree planting would be carried out between the months of November and March when trees are dormant and more likely to establish successfully. Days

<sup>18</sup> [Bracken Control - A Guide to Best Practice | NatureScot \(webarchive.org.uk\)](https://www.nature.scot/bracken-control-a-guide-to-best-practice)

<sup>19</sup> Scottish Forestry. (2021). Cultivation for upland productive woodland creation sites: applicants' guidance. <https://forestry.gov.scot/publications/1032-cultivation-for-upland-productive-woodland-creation-sites-applicant-s-guidance>



when the ground is frozen or when snow or excessive surface water is present are to be avoided.

- Prescription 3.2 Fencing of some planting areas may be required to protect new trees from deer and livestock browsing during the establishment phase. Any new fencing within 1 km of the known black grouse leks would follow guidelines in Trout & Kortland (2012)<sup>20</sup> to minimise collision risk for black grouse. Trees will be planted in 1 m - 1.2 m tree tubes to further protect from browsing damage in areas that are unfenced, or where deer or livestock may breach fenced areas. Tree tubes will be removed after approximately 10 years or after adequate establishment of the trees.
- Prescription 3.3 Manage deer densities, if required, to allow woodland establishment. Subsequently use the results of vegetation and tree monitoring to determine whether ongoing deer management and culling requires to be reviewed to allow successful establishment of the trees planted.
- Prescription 3.4 Prohibited activities noted in Prescription 1.5 above apply (with the exception of planting trees).

#### 5.4 Aim 4: Living Green Roof Creation (Unit F)

- Objective 4.1 Create native wildflower-rich green roofs to increase floral diversity and provide more flower-rich habitat that benefits insects and pollinators.
- Prescription 4.1 Create suitable green roof infrastructure on the two control and welfare buildings sited within the substation compound. This will involve the integration of a suitable growing medium with subsequent sowing of an appropriate native wildflower seed mix at the correct time of year. The wildflower seed mix will be confirmed within the final BEMP.
- Prescription 4.2 Undertake green roof maintenance or supplementary sowing if required and in line with any relevant best practice and guidance information.
- Prescription 4.3 No supplementary chemical fertilisers or organic manures to be applied for the lifetime of the BEMP.
- Prescription 4.4 Weed species such as docks, ragwort and creeping thistle will be controlled where they impact negatively on the overall area. Weeds can be chemically spot treated.

## 6 BIODIVERSITY NET GAIN ASSESSMENT

### 6.1 Overview

The SSER biodiversity toolkit<sup>3</sup> was used to quantify the biodiversity value of the Site based upon the habitats present and to demonstrate the project would achieve biodiversity enhancements in line with NPF4 Policy 3 requirements. This includes:

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<sup>20</sup> Trout, R. and Kortland, K. (2012). Fence marking to reduce grouse collisions. Forestry Commission Technical Note.

- Quantitative assessment to determine the biodiversity baseline prior to development based on the habitats data collected for the Proposed Development (**Appendix 8.1** and **Figure 8.3**);
- Assessing the loss of habitat during construction; and
- Analysis of the biodiversity value following works, with retention and creation/restoration/enhancement of habitats on-site and off-site.

Habitat quality (distinctiveness, condition, strategic significance and connectivity) was determined for each Phase 1 habitat type by reviewing the habitat survey data and surveyor experience, and referring to the following guidance:

- SSER BNG Toolkit User Guide<sup>3</sup>;
- Natural England Biodiversity Metric 4.0<sup>21</sup> – User Guide, Technical Supplements, and Habitat Condition Assessment; and
- JNCC Common Standards Monitoring (CSM) criteria<sup>9</sup> (used to aid some habitat condition assessments).

In line with SSER guidance<sup>22</sup>, the boundary for the baseline biodiversity assessment equates to the habitats within the Site boundary affected by the Proposed Development (i.e., areas of permanent and temporary land take), including any buffer effects, where appropriate (e.g., indirect drainage effects on relevant wetland habitats), along with any areas identified for biodiversity enhancements (i.e., the proposed OBEMP Units).

## 6.2 BNG Assessment Results

### 6.2.1 Biodiversity Baseline

The biodiversity baseline for the Proposed Development therefore covers 279.11 ha and is based upon the habitat quality scores (distinctiveness, condition, strategic significance and connectivity), the area of the habitats directly and indirectly affected by the Proposed Development<sup>23</sup>, the area of OBEMP units A – F, and the resulting number of Biodiversity Units (BU) or Irreplaceable (IRR) habitat units each area and type of habitat contributes. Habitat types of less than 0.01 ha are under the minimum mappable unit (MMU) and were not included in line with SSER metric guidance<sup>3</sup>, as they are not large enough to be considered a viable habitat and be effectively managed to increase overall biodiversity.

Using the SSER BNG toolkit, the biodiversity value of the baseline BNG assessment area was calculated to be 1901.04 BU, with zero IRR<sup>24</sup>.

<sup>21</sup> <https://publications.naturalengland.org.uk/publication/6049804846366720>

<sup>22</sup> <https://www.sserenewables.com/media/vgsdoav3/sser-biodiversity-net-gain-report-nov-2022-final.pdf> and SSER BNG representative Pers. Comm 05 September 2024.

<sup>23</sup> The predicted and potential habitat losses and modifications associated with Proposed Development for each habitat type are detailed in **Chapter 8: Ecology, Table 8-11**.

<sup>24</sup> No irreplaceable habitats (as detailed within SSER guidance) are predicted to be lost as a result of the Proposed Development.



### 6.2.2 Biodiversity Change during Construction

During the construction of the Proposed Development, habitats will be lost, either temporarily or permanently, to provide construction compounds, access tracks, and the turbine/hardstandings infrastructure footprints. The majority of habitat, and biodiversity, under the infrastructure footprint areas is therefore lost during works. There may also be some indirect drainage effects on relevant wetland habitats, with a 10 m indirect drainage buffer assumed, as discussed further in **Chapter 8: Ecology**. The relevant habitats in this buffer are not lost and are retained, however in line with SSER BNG guidance for affected habitats, it is assumed that the indirect effects result in a drop in habitat condition category.

The BU that will be removed to accommodate the Proposed Development are summarised in **Table 6-1** below. The assessment results, as shown in **Chapter 8: Ecology, Table 8-11**, predict a 14.31 ha loss of habitat for permanent infrastructure. The SSER BNG Metric user guide<sup>3</sup> states that in situations where habitats will be temporarily impacted by any works and will be fully restored to its baseline condition (or improved) within two years, it can be considered as retained habitat within the toolkit. Therefore, temporary working areas in habitats such as bracken and certain grasslands are considered to fall within this category (here covering approximately 6.66 ha). However, certain habitat types temporarily impacted at the Proposed Development will likely take more than two years to recover to their previous condition and therefore this cannot be considered a ‘temporary’ loss and must be recorded in the BNG calculation tool as having been permanently lost. Resultantly, a further 2.99 ha loss of habitat for temporary working areas in habitats such as acid and marshy grasslands, wet and dry heath, blanket bog, wet modified bog, and flush is predicted, and these have been considered a loss in the BNG toolkit. Potential indirect modifications to certain sensitive wetland habitats cover a further 6.36 ha, with drop in habitat condition and associated BU assumed in the BNG toolkit.

At the end of the construction phase, any temporary working areas will be restored following best practice methods and guidance. It is assumed that in general and where feasible and practicable, reinstated habitats in the temporary works areas will be ‘like for like, or better’, compared to the baseline habitat and in line with guidance principles.

Overall, this equates to a loss of 62.98 BU at the end the construction phase.

### 6.2.3 Post Development Biodiversity Enhancement

Biodiversity enhancement and an increase in BU would be delivered through the enhancement/restoration and creation of habitat types following the construction of the Proposed Development, as proposed for the habitat types and Units A - F as outlined in Section 4 above and shown in **Figure 8.16**.

The proposals within this OBEMP would result in:

- the restoration and enhancement of 84.81 ha of priority peatland blanket bog and modified bog habitats across Units A and B;
- improvements in the condition of approximately 54.65 ha of non-priority shallow peatland habitats such as wet heath across Units A and B;
- the removal and control of 50.27 ha of dense bracken across Units B and C for acid grassland restoration;

- the creation of up to 3.69 ha of riparian native broadleaved woodland in Unit D;
- the replacement of up to 33.20 ha of conifer plantation with new native broadleaved woodland in Unit E; and
- the creation of 0.02 ha of living green roofs (Unit F).

All of the proposals above will enhance biodiversity at and around the Proposed Development on top of the retained baseline habitats.

The value of these habitats in terms of BU, and the increased BU produced due to the enhancement and creation of habitats is summarised in **Table 6-1**.

#### 6.2.4 Summary of Overall Biodiversity Change

**Table 6-1** summarises the change in BU from the baseline, during works (lost and retained habitats and Site reinstatement), and enhancement and creation of habitats following completion of construction and as set out within this OBEMP.

Following construction and Site reinstatement the Proposed Development would result in the loss of 62.98 BU. Following implementation of the BEMP as outlined here, the Proposed Development would result in the creation of an additional 613.39 BU. These BU created through the OBEMP would fully compensate for the BU lost during construction (i.e., -62.98 BU) and then provide significant net biodiversity enhancement over and above the pre-development baseline values of +550.40 BU (a net gain of 29%).

**Table 6-1: Biodiversity Unit Change at each Stage of Development**

Stage	Biodiversity Units (BU)	BU Gained/Lost from Baseline
Baseline	1901.04	N/A
Construction phase and following Site reinstatement of temporary working areas	1838.06	-62.98 (-3.30%)
Post Development: OBEMP – habitat enhancement/creation	2451.45	+550.40 (+29%)

#### 6.2.5 Limitations to the BNG Assessment

The post development biodiversity unit calculations are based on the difficulty to create habitats (delivery risk) and the time (in years) to reach their target condition (temporal risk) which are based on published guidance<sup>10</sup> and previous project experience, these are generally average values and as such there may be natural variation around the time to reach target condition.

The BNG assessment has been undertaken on the data currently available, the infrastructure layout and proposals for construction of the Proposed Development as set out in **Chapter 2: Proposed Development**, and the biodiversity enhancement proposals outlined within this OBEMP. Should any of these elements change then there may be a change in the BNG calculations for the Proposed Development. Therefore, the BNG toolkit and assessment would be refined/updated and detailed in the final BEMP post-consent/pre-construction, in line with the most up to date proposals for the

Proposed Development, consultation feedback, and the final agreed BEA, management units and associated proposed enhancement measures.

## 7 MONITORING

Monitoring will establish whether the proposed management prescriptions are achieving the various aims and objectives, and in turn will inform adaptive management to ensure the aims and objectives are achieved through the life of the BEMP.

The sections below outline the likely monitoring required for the proposals detailed above, however the detailed monitoring proposals will be provided in the final BEMP to be submitted post-consent and pre-construction when the BEA, management units and associated proposed enhancement measures have been finalised. An indicative monitoring timetable is provided in **Annex A**.

### 7.1 Aim 1: Restore & enhance peatland habitat and improve bog and wet heath condition (Units A & B)

The following monitoring would be undertaken to evaluate the success of this aim:

- Habitat/vegetation monitoring would evaluate the success of restoration and enhancement of peatland habitats. This would be achieved by recording changes to the structure and composition of the vegetation and species abundance, evenness and diversity. Recording of impacts from deer/livestock would also be included in the monitoring programme, in order to inform any adjustments to the grazing regime specifically in Unit A.
- A representative sample of permanent quadrats or line transects would be established within Units A and B to gather sufficient data to inform future management and assess the trajectory of plant species and habitats. The respective monitoring surveys would be carried out at the most appropriate times of year (e.g., flora surveys versus browsing impact surveys). Repeat surveys would be carried out in the same month in each monitoring year (Years 1, 3, 5, 10, 15) to gather comparable data. Photographs would also be taken of each sample quadrat/line transect, as well as overview photographs of the Units.
- In addition, as it is proposed to fence off Unit A and manage the grazing regime, a number of quadrats/line transect monitoring locations would also be set up outwith the enclosed Unit A and in nearby and similar habitat in order to allow a temporal comparison of the habitats inside and outside the enclosure over the lifetime of the BEMP.
- Blanket bog and wet heath condition assessments utilising i) the latest Biodiversity Metric<sup>10</sup> condition assessment pro-forma and methodology, and/or ii) a CSM<sup>9</sup> blanket bog site condition survey, at representative locations within Units A and B.
- Any peat hagg, gully, or surface reprofiling works, and any installed dams or drain blocking, would be monitored to ensure works are successful over the first three years after works are completed. Remedial measures would be undertaken if restoration works have failed.
- The presence of regenerating and encroaching self-seeded conifer trees and the success or removal measures would be monitored.

## 7.2 Aim 2: Restore acid grassland habitats (Units B and C)

Monitoring in Unit C and the relevant parts of Unit B would likely include:

- Bracken monitoring, such as walkover surveys and mapping extent and change over time.
- Grassland monitoring through the establishment of a representative sample of permanent quadrats/line transects to record changes to the composition of the vegetation and species abundance, evenness and diversity. The respective monitoring surveys would be carried out at the most appropriate times of year. Repeat surveys would be carried out in the same month in each monitoring year (Years 1, 3, 5, 7, 10, 15) to gather comparable data. Photographs would also be taken of each sample quadrat, as well as overview photographs of the Units.
- A relevant grassland condition assessment utilising i) the latest Biodiversity Metric<sup>10</sup> condition assessment pro-forma and methodology, and/or ii) a CSM<sup>9</sup> grassland site condition survey, at representative locations within Units B and C.

## 7.3 Aim 3: Create and expand native broadleaved woodland cover (Units D and E)

Monitoring would be undertaken in Units D and E to ensure the establishment of the broadleaved woodland.

A professional forester would monitor the planted areas in Years 1 - 5 following planting to ensure successful establishment, specifically looking for evidence of damage (e.g., browsing) or disease. Failed specimens should be replaced in the consecutive winter (i.e., between November and March). The forester would also advise on whether any further management or maintenance is required to ensure the establishment of the trees. Any additional measures would be discussed and agreed within the BMG.

These areas would be monitored again by a professional forester in operational Year 10 to ensure that there are no issues with disease or invasive species and to determine if any thinning at this stage would benefit woodland establishment. Monitoring would be undertaken again in operational Year 20 when some thinning operations may be required in woodland in order to encourage growth of better trees and create more open woodland, further new enhancement/enrichment planting may also be considered at this stage. This would aid regeneration of seedlings and begin the process of establishing a mixed age structure.

Unit D and E respective target habitat type and target condition category would also be assessed and monitored using the latest Biodiversity Metric<sup>10</sup> condition assessment pro-forma and methodology, or suitable equivalent, in operational Year 5, and every 5 years thereafter.

## 7.4 Aim 4: Green Roof Creation (Unit F)

Monitoring of Unit F, due to its size and location, would likely include fixed point photography and the collection of qualitative target notes only (Years 1, 3, 5, 7, 10, 15).

## **8 REPORTING & BEMP REVIEW**

A report would be submitted by the wind farm owner to the BMG in Years 1, 3 and 5 of operation, the frequency of reporting after Year 5 would be agreed by the BMG. This report will detail:

- Management undertaken in the past year(s);
- Monitoring undertaken, results and discussion of results; and
- Management and monitoring proposed for the following year(s).

The BMG may meet periodically to discuss the reports and management of the Site, if this is considered necessary by the members of the BMG.

Where monitoring indicates any management objectives are not met, further management prescriptions or interventions would be agreed by the BMG.

The requirement for the measures, monitoring and reporting following year 15 of the operational phase would be dependent on the results of the monitoring which would be discussed and agreed within the BMG in year 15, or as agreed in writing with the BMG.

In addition, the BEMP would be reviewed by the BMG every five years from its commencement, or earlier if the BMG consider it necessary. The purpose of the review will be to assess the effectiveness of the proposed management prescriptions at achieving the aims and objectives of the BEMP. If necessary, such measures may be amended by the BMG at any time.

## **9 OFF-SITE FINANCIAL CONTRIBUTION TO BIODIVERSITY ENHANCEMENT**

The Applicant has engaged with the local River Cree Hatchery & Habitat Trust and intends to make a financial contribution to support their work and biodiversity enhancement within respective catchments, further details will be provided within the final BEMP.

## **10 CONCLUSION**

The OBEMP for the Proposed Development, as outlined above, proposes an extensive suite of habitat and biodiversity compensation and enhancement measures, for a variety of habitat types and which will benefit local flora and fauna and result in significant net gains for biodiversity (as also indicated via the BNG metric results).

## ANNEX A. MANAGEMENT AND MONITORING TIMETABLE

Table A-1 Indicative Management and Monitoring Timetable

Year	0*	1**	2	3	4	5	6	7	8	9	10	11	12	13	14	15...	
Work Item	Year of Implementation																
<b>Management Prescriptions</b>																	
Livestock fencing of Unit A	✓	✓															
Livestock exclusion/management of grazing regime (Unit A)		Throughout lifetime of BEMP, as necessary and informed by BEMP monitoring															
Peat hagg reprofiling and drain blocking (Unit A)	✓	✓															
Conifer encroachment/regeneration removal (Units A & B)		✓	✓	✓	✓	✓	Throughout lifetime of BEMP, as necessary and informed by BEMP monitoring										
Excluded activities as per Prescription 1.5 (Units A - E)		Throughout lifetime of BEMP															
Bracken control & management for grassland restoration (Units B & C)		✓	✓	✓	Throughout lifetime of BEMP, as necessary and informed by BEMP monitoring												
Livestock/deer exclusion fencing (Units D & E)	As required for Unit D establishment and following felling and replanting in Unit E																
Deer management, if required (Units D & E)		Throughout lifetime of BEMP, as necessary and informed by BEMP monitoring															
Creation of living green roof and seeding (Unit F)	✓	✓															
Removal of tree tubes (Units D & E)											✓ <sup>25</sup>						
Injurious weed control (Unit F)		Throughout lifetime of BEMP, as necessary and informed by BEMP monitoring															
<b>Monitoring</b>																	
Inspection of peat hagg reprofiling and drain blocking/peat dams (Unit A)		✓	✓	✓													
Vegetation monitoring and bog/wet heath condition assessments (Units A & B)		✓		✓		✓					✓						✓
Self-seeded non-native conifer extent mapping/monitoring (Units A & B)		✓		✓		✓		✓		✓	✓						✓

<sup>25</sup> Fast growing species may require the removal of trees guards before Year 10, to prevent damage. This would be informed by forestry monitoring surveys.

Year	0*	1**	2	3	4	5	6	7	8	9	10	11	12	13	14	15...
Vegetation monitoring and grassland condition assessments (Units B & C)		✓		✓		✓		✓			✓					✓
Bracken extent mapping/monitoring (Units B & C)		✓		✓		✓	Throughout lifetime of BEMP, as necessary and informed by BEMP monitoring									
Broadleaved woodland establishment/growth monitoring – (Units D & E <sup>26</sup> )		✓	✓	✓	✓	✓	As required and informed by BEMP monitoring									
Broadleaved woodland condition assessment (Units D & E)						✓					✓					✓
Fixed photography monitoring and target notes (Unit F)		✓		✓		✓		✓			✓					✓
<b>Reporting / Reviews</b>																
BEMP Report		✓		✓		✓	Reporting schedule after Year 5 to be agreed by the BMG									
BMG 5-year review of BEMP						✓					✓					✓

\* Construction Phase

\*\*First year after final commissioning of the Proposed Development / Operational Year 1.

<sup>26</sup> Following initial planting, any failed specimens recorded during forestry monitoring surveys would be replaced during a ‘beating up’ second planting period to be determined.