

LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

Rhu and Shandon Community Council Preliminary Consultation Response. 6 April 2020

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LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

SITE LOCATION MAP Posted Separately

LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

Letrault and Stuckenduff planting boundary map: Posted Separately

Introduction

Barry Harper of Scottish Woodlands contacted Rhu and Shandon Community Council in July 2019 seeking the Community Council's preliminary view on the proposed afforestation of Letrault and Stuckenduff farms. Scottish Woodlands propose planting 82.72 ha at Stuckenduff Farm and 201.4 ha at Letrault Farm on the slopes of Tom na h-Airigh as shown on the attached maps.(posted)

The enquiry from Scottish Woodlands is in the email reproduced in Appendix 2 and is:

“A pre-consultation enquiry that will be used to inform Scottish Woodlands of any concerns the Community Council may have on the proposal and will influence the final design before moving forward to more official consultation through Forest & Land Scotland.’

The proposed start date for creation of the new forestry scheme is October 2020.

The proposal is for commercial forestry based primarily on Sitka spruce but will also include areas of other conifers, native broadleaves and open ground to create a mixed woodland. This extension of the Highlandman's and Torr plantation would provide additional access for the public. While the proposal will include a deer fence around the perimeter, we will be adding gates, stile's etc. to ensure access for the public. Any current routes will be identified with access maintained. ‘

The initial email enquiry seeking the CC's preliminary view noted the following EIA (Environmental Impact Assessment) had undertaken the following studies:

- Archaeology:
 - 6 locations within the proposed planting areas that require buffering from planting
 - Consultation will be sought from the local council as to extent of buffer required.
- Birds:
 - Surveys for breeding birds, Raptors and Black Grouse has been carried out with lek sites within the planting boundary located.
 - Concern was raised over Hen Harrier and Merlin however none have been found on site with habitat identified as being unsuitable on the whole for these species
 - Black Grouse lek's will be located, buffered and discussed with RSPB to ensure protection.
 - No other concerns were raised from bird surveys.
- Vegetation:
 - A survey was carried out to identify any areas of important habitats and vegetation including assessment of their condition & conservation status.
 - Findings revealed areas of M6d acid flush & M23a marshy grassland are present of moderate species-richness, evenness & distinctiveness.
 - GWDTE (Ground Water Dependent Terrestrial Ecosystems) are present but of low species-richness, evenness & distinctiveness
 - As a result the findings do not pose a constraint to tree planting.
- Peat:
 - A survey covering the whole site for peat has been undertaken with areas of >50cm depth removed from the planting scheme.
 - Deep peat poses a constraint to tree-planting and is generally limited to the uppermost parts of the site.

We have also consulted the Forestry Commission, or Scottish Forestry as they are now, who are generally in favour of planting this site so long as due diligence is carried out. This includes both the

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survey work highlighted above along with consultation with the local community and council to gauge opinion.

From the start of this I am aware the main concern with regards this proposal is the future extraction of timber from the site as the current haulage route is the existing access out through Highlandman, and as such Rhu village which has proved controversial despite all operations going as planned. With this in mind we have been in discussion with the neighbouring estate to discuss a possible access route to the east eventually emerging on the A818 north of Helensburgh, a route previously put together to service a proposed wind farm that failed to get approval.

Discussions have been held with the estate and we are hopeful this will be agreed as it would not only facilitate this proposal but also future harvesting from Highlandman which would remove haulage from through Rhu in the future. Currently this is only under discussion however I would hope this will progress and if the route can be agreed, this will be put in place prior to any future harvesting at Highlandman. “

The consultants' reports on the above topics were supplied to the CC in October 2019.

The Community Council has also been supplied with the pre-application response from Barry Blackwood of Scottish Forestry dated 29 July 2019 on 30 October 2019. See Appendix 2.

General Comments

Background

The Community Council must reflect on their learned experience of forestry operations in the village of Rhu during 2017-2019 and the Phase 1 felling of Highlandman's Wood. Obviously our comments and concerns on the proposed afforestation of Letrault and Stuckenduff are influenced by the actual experience of this forestry felling and replanting operation.

Highlandman's and Torr Plantations

The Community Council were consulted on the felling operations proposed for Highlandman's Wood in December 2016 and provided a comprehensive response in a letter dated 22 March 2017. This letter recommended a community information / consultation event and identified possible problems that might arise. No community consultation or information was circulated and many of the problems identified by the CC did in fact arise. The timber extraction at Highlandman's Wood caused a great deal of upset in the village and in general the timber extraction and transport was not carried out to the standards the community expected.

The main issues arising were:

- Lack of community engagement
- Timber transport
- Watercourse pollution
- Damage to Historic Environment features
- Blockage of core recreational paths

These issues led to formal complaints to Scottish Forestry, SEPA, Argyll and Bute Council and local residents also complained to the Local Government Ombudsman.

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The Community Council expect that their comments and recommendations regarding the proposed afforestation of Letrault and Stuckenduff will be accorded considerably more attention and consideration than was given to our representation on the Highlandman's Wood felling operation.

Letrault and Stuckenduff

All comments are preliminary comments based on the CC's assessment of the information provided. The CC have a statutory responsibility to reflect the views of our community and accordingly all comments made here are preliminary and will be finalised following public consultation. The CC are not in principle opposed to afforestation of the Letrault and Stuckenduff hill land. However, we expect to see our comments given here addressed in the final proposal and until the final proposal is produced and a public consultation event has taken place and the Community Council has received comments from residents our general approach of not objecting in principle should not be interpreted as support for the proposal.

The CC consider the afforestation of current grass pasture on the lower slopes of Letrault unacceptable. The afforestation should be restricted to the unimproved moorland grazing on the upper slope.

The CC are not able to support a proposal that utilises Station Road and Pier Road Rhu for timber extraction or afforestation activities that involve frequent movement of heavy plant and lorries.

The CC support the use of rail for timber extraction.

The CC support the creation of a new access track across Luss Estates land to join the A818 on the Blackhill above Helensburgh but note that this proposed track would require additional pre-development survey. This area is a designed landscape dating to 1732 and any development must ensure any impact on the historic environment features are mitigated.

Watercourse management and flood risks need to be addressed as part of the project planning.

Visual impact, amenity and community benefit need to be addressed and detailed information provided.

Planting Area

The planting area is split into two parcels. Letrault covers 201.4 ha and extends from the West Highland Railway line at approximately the 70m contour line to the top of Tam na h'Airigh. The Stuckenduff parcel is 82.72 ha and extends for the 200m contour to the top of the hill.

The Stuckenduff planting parcel encompasses unimproved hill land currently used for 4 x 4 off-roading. The Letrault parcel encompasses all the improved pasture fields immediately above the railway line bordering Aldonwick Glen on the east side and includes the old reservoirs. It also includes at least seven watercourses.

The hill is well used for recreation. The CC is of the view that planting all the way to the railway line would be visually oppressive and remove recreational facilities, and general amenity including varied landscape views from the wider area. The lower lying pasture is improved land and suitable for agriculture.

The planting area also includes the old reservoirs, which are associated with dams, sluices and tracks. This is a popular local walk which would be unavailable if planted with trees and the views out over the Gareloch, northwest to the Arrochar Alps and south across the peninsula to Arran etc would all be lost once the conifer forest was mature. This would be a loss of amenity for local residents.

The area is looked out on from the Rosneath Peninsula and the forestry will be a visually prominent feature.

The **Argyll and Bute Council. Woodland and Forestry Strategy. April 2011** zones Argyll and Bute by how suitable the land might be for afforestation. It is noted that the lower lying improved land above the railway line on the Letrault parcel is considered *Sensitive*. The unimproved moorland at the top of the hill is zoned as *Preferred* although deep blanket bog peat, which requires protection, will restrict planting in this area.

Argyll and Bute Council. Woodland and Forestry Strategy. April 2011

HELENSBURGH, GARELOCH AND THE ROSNEATH PENINSULA

3.63. This comparatively small zone, sandwiched between the sea and the Loch Lomond and Trossachs National Park, presents a number of opportunities for positive woodland management. Although there is potential for expansion, the presence of an extensive band of settlement running from Helensburgh to Garelochhead would require sensitive planning and handling of amenity, visual and environmental issues. Proximity of woodlands to urban populations means that access and recreation is a fundamental issue – and a major opportunity for community engagement. Initiatives such as those involved in the management of the Duchess Woods LNR in Helensburgh and the Kilmahew Woodlands at Cardross are key mechanisms for promoting interest and buy-in to woodlands. Similarly, active management and enhancement of existing farm and riparian woodlands will be important for the development of habitat networks linking the upland areas with the coastline and connecting isolated stands of trees.

Preferred: land that offers the greatest scope to accommodate future expansion of a range of woodland types, and hence, to deliver on a very wide range of objectives. Sensitivities are limited and it should be possible to address any site-specific issues within well-designed proposals that meet the UK Forestry Standard and associated guidelines.

Sensitive: areas where the nature or combination of sensitivities restricts the scope to accommodate woodland expansion or removal. Limited expansion is only likely to be possible where proposals are

of a scale and character which can be accommodated without significant negative impacts, and/or where it would positively enhance features of interest

The Community Council would like to see some visualisations of how the views to and from the proposed forest will appear.

Archaeology and Historic Environment

Stuckenduff/Letrault, Argyll & Bute

Walkover Survey, (Project 4952 and 5265) by GUARD Archaeology. May 2019.

This report has been reviewed by Rhu and Shandon Community Council member and professional archaeologist Fiona Baker (BA Hons Archaeology (Dunelm), FSA Scot).

The survey report states in 5.1 that the whole site area, 284.10 ha or 2.84 sq km, was walked by archaeologists spaced 20m apart and included a 100m buffer zone on all sides of the site boundaries. The survey took place 23 – 28 May 2019, late May is not the optimum time for field survey as the vegetation is up, as noted in the ecologist's report.

Had this methodology been employed the bomb crater located at the south side of the reservoirs and the filter house remains at NS 27094 85147 should have been recorded. The chapel site on Chapel Burn might also have been mentioned and investigated. A glaring omission within the survey area is the square enclosure and structure at NS 27041 85302, (map assessment suggests it is a sheep fank) a site which should be preserved.

The field interpretation and suggested dating of recorded features is very basic. For example Site CHS07 is described as a level grassy area with three cairns. No explanation is given for the difference in vegetation, grassy areas in upland heath located close to watercourses are often shieling sites (Tom na h'Airigh does mean 'Hill of the Shielings') and the description of the central C shaped stone cairn, along with the topography, suggests it might actually be a burnt mound (usually Bronze Age). Site CHS08 should also be considered as a potential burnt mound. No field boundaries, dykes or tracks are recorded although these exist within the survey area including a major head dyke and infield and outfield boundaries. As these boundary features have not been recorded or assessed for date no mitigation is currently recommended.

There is no mention of Letrault or Stuckenduff appearing in medieval charters and no landscape interpretation or discussion of agricultural improvement or previous land use.

The 'Discovery and Excavation in Scotland' entry record the structural remains at CHS03 (Croy) as being called 'Ladyacre' but this is not referenced in the written description and it is not shown or named on the First Edition OS map or earlier maps. The source of this information is required.

In conclusion the archaeological report is basic and lacking in interpretation. The mitigation strategy is generic. 5m is often not an adequate buffer zone that would allow a visitor to understand or interpret an archaeological site. The overall impression is the survey was carried out by inexperienced field archaeologists with limited funding. The failure to record significant field boundaries and provide landscape interpretation does not instil confidence that this is an adequate assessment.

Detailed mitigation proposals are required including for the unrecorded stone dykes. The unrecorded square enclosure should also be preserved.

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Should no further archaeological field survey be undertaken in advance of determination of a planting licence it would be beneficial for a walkover survey to be undertaken after forestry ploughing to ensure buried and unrecognised sites are identified and preserved by record.

No assessment has been made of the proposed new track route across Luss Estates land to the east of Highlandman's Wood. This area is a designed landscape dating to 1732. This would be required and a mitigation strategy agreed before any development could take place.

Raptors, Black Grouse and birds

Tetrix Ecology undertook two desk based studies and field surveys:

1. PROPOSED WOODLAND PLANTING AT LETRAULT AND STUCKENDUFF, ARGYLL AND BUTE Scarce Breeding Raptor Survey during March- July 2019.

and

2. PROPOSED WOODLAND PLANTING AT LETRAULT AND STUCKENDUFF, ARGYLL AND BUTE Black Grouse Lek Survey during March- May 2019.

These reports have been reviewed by Rhu and Shandon Community Council member John Clark.

Review of the Tetrix Bird Surveys

1. Letrault & Stuckenduff Black Grouse Lek Survey – 28 July 2019
2. Letrault & Stuckenduff Scarce Breeding Raptor Survey - 28 August 2019

Introduction

Because of my ornithological experience as a member of the Central Scotland Raptor Study Group and the fact I carry out surveys for BTO, WeBS & RSPB including Black Grouse Lek counts in the adjacent area I have been asked to review the above reports.

Black Grouse Lek Survey

The survey was carried out to the recommended methodology. The findings are in line with my experience. If the mitigation and recommendations are carried out in line with the report and the enhancement of incorporating native trees is incorporated I think that the impact will be minimised.

Scarce Breeding Raptor Survey

As previously the survey was carried out to the recommended methodology.

The observations are reflective of our observations in 2019. My only comment is whether a single year's survey is adequate to give a true picture. 2019 was a particularly bad year in the local area for Hen Harrier, Short-eared Owl, Kestrel and Barn Owl probably due to food supply and weather.

With regard to Merlin the study confirms my observations that Merlin is only present in passage even though pockets of suitable habitat exist.

The proposed woodland may provide some reasonable habitat in the first few years.

John Clark

Habitat, Vegetation, Ground Water Dependent Terrestrial Ecosystems and Peat

A field survey and assessment of the Letrault parcel was undertaken by Dr Andy McMullen of Botanaeco in June 2019.

No member of the CC is professionally qualified to comment on this report.

We note there is Class 1 peatland above the 330m contour and Class 2 peatland between the 220m and 330m contours. Class 1 & 2 peatland define "nationally important carbon-rich soils, deep peat and priority peatland habitat". They are distinguished by Class 1 being of "high conservation value" and Class 2 being of "potentially high conservation value and restoration potential"

We note there are two Ancient Woodland Inventory sites.

We note there is broadleaf semi native woodland adjacent to the water courses on the lower slopes and around the old reservoirs.

No similar report has been produced for the Stuckenduff parcel, this is required in advance of any further comment and decision as to whether a planting licence may be granted.

We note there are several areas and pockets of semi-natural woodland and we would prefer to see native broadleaf planting linking these areas and creation of wildlife pathways.

Water management and flood risks

The design and implementation of afforestation will require considerable care due to existing flood risks to the houses below the West Highland Railway line. In the Stuckenduff section there have been major flooding incidents involving two of the 4 burns which pass through this area; Kirk Brae some 26 years ago and currently major flooding problems from Chapel Burn. The hillside has been damaged extensively with the creation of a pond, 'The Blue Lagoon', and by the extensive series of tracks which are used for 4 wheel drive vehicles. These activities have contributed to the gravel, soils and other debris coming down into Chapel burn. The culverts under the West Highland Line and a disused line into Faslane became blocked and ultimately fractured and the damage to the hillside and properties is extensive. Work is supposed to start in April 2020 to repair this (Network Rail and MOD).

Before any planting can be considered all watercourses must be surveyed and repair / mitigation work undertaken where it is needed.

The 4x4 tracks above Stuckenduff are not 'constructed' and do not have proper drainage. If they are to be maintained, they will need to be upgraded with adequate drainage that complies with SEPA guidelines

Afforestation has the potential to alter natural drainage patterns. Given the Community Council's experience of the poor watercourse management during the Phase 1 felling at Highlandman's Wood, eventually resulting in SEPA issuing notices requiring remedial action, we have serious concerns about water management issues.

It might be appropriate for Scottish Woodlands to confirm compensation agreements with households adjacent to the water courses.

Timber transport

At this stage the concern is access of heavy plant but the extraction of the timber in the future must be considered from the outset. The only currently available option is through Rhu on Station Road and Pier Road. This is not an acceptable option to the residents of Rhu who have made their feelings on this matter very clear during the first phase of the Highlandman's Wood timber extraction.

The CC cannot support any proposal that does not include an alternative arrangement of the extraction of timber. The CC suggest rail may be an option or the proposed new track linking to the A818 above Helensburgh.

Access, Public Access and Community Benefit

No information has been provided on how the new plantation would link to Highlandman's and Tor plantation. This is required. Details of how the hill will be accessed for planting and timber extraction is required. It has already been that Pier Road and Station Road in Rhu is not an acceptable access route.

No detailed information on public access has been provided with regard to forest walks or mountain bike trails. The consultation request email says the afforestation would be 'adding gates, stile's etc. to ensure access for the public. Any current routes will be identified with access maintained. '

Consideration should be given to linking new paths in the plantation area to existing path networks including core paths and informal paths.

The preservation of the existing semi-native woodland provides an opportunity for mixed native species broadleaf planting linking the existing pockets of woodland and creating a wildlife corridor. Such a corridor could also contain a forest walk, mountain bike trail and horse riding trial. Increased recreational facilities and consideration for wildlife pathways (note Red Squirrels are moving south into the area) would go some way towards mitigating the impact of planting the hill in dense monoculture conifers. The provision of such a wildlife corridor and walking / active travel route would also benefit the local economy as it would provide improved amenity and tourism facilities.

Consideration should also be given to viewpoints within the plantation.

Public consultation and information

A public consultation on the proposals is required in accordance with the CONFOR guidelines on stakeholder engagement.

Information on traffic movements and timetables of work should be provided to the community. This can be achieved through local media.

Summary Comments

Rhu and Shandon Community Council would hope to see the following points addressed in the proposal brought forward for public consultation. **The Community Council expect the community consultation to take place before the final application for planting is submitted to Scottish Forestry and for it to reflect the views of the community.** This document is our preliminary assessment of the information provided thus far (four EIA reports) and other matters on which no detailed information has been provided.

The Community Council does not object in principle to the afforestation proposals but will object if certain matters such as transport, flooding and issues mentioned below are not satisfactorily addressed and mitigated. At the present time the Community Council neither supports nor objects to the proposals. The Community Council's final view will be forthcoming following the community consultation exercise when we have received the comments from residents and when the issues identified on which further information is required has been received.

1. Public consultation by Scottish Woodlands in accordance with CONFOR guidelines in advance of submission of final afforestation proposal.
2. Additional environmental impact assessment (all disciplines) is required for the proposed new access track of Drumfad Farm / Luss Estates land from Highlandman's Road to the A818.
3. Pier Road and Station Road, Rhu are not acceptable as access or exit routes for afforestation or timber extraction.
4. A field survey and report on Habitat, Vegetation, Ground Water Dependent Terrestrial Ecosystems and Peat is required for the Stuckenduff parcel.
5. Proposed afforestation area should be reduced and improved grass pasture on the lower slopes on Letrault Farm (deemed 'sensitive' in the A&B C Woodland and Forestry Strategy) should not be planted along with the unimproved land on the lower slopes. Further, that planting to the railway line would be oppressive and an adverse impact on general amenity. The CC are of the view the forestry planting should be restricted to unimproved moorland. Afforestation should be restricted to above the main head dyke at 200m on line with the west boundary of the Stuckenduff parcel.

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6. Scarce Breeding Raptor Survey – our independent review suggests a single year of observation may be insufficient to reach a valid conclusion.
7. Planting plan showing areas of native broadleaf and new tracks / forest walks and mountain bike trails and community benefits is required, including details for public access.
8. Proposal for the new track across Luss Estates land and the 18th century designed landscape and impact on Highlandman’s Road and the Three Lochs Way (core paths) is required.
9. Has consideration been given to using the railway for future extraction of timber? Could the Strategic Timber Transport Scheme (SSTS) provide funding to support this?
<https://forestry.gov.scot/forestry-business/timber-transport/strategic-timber-transport-scheme>
10. The forest would be visually prominent from Rosneath and the forest would also impact views from Rhu and Shandon and the views currently enjoyed from the hill. Visualisations of the forest and the visual impact are requested.
11. The CC would like to see the existing pockets of semi-native woodland and vegetation linked together by new diverse broadleaf planting and the creation of wildlife corridors within the monoculture of conifer plantation. All stands of native / semi native woodland should be preserved and all large areas of native bluebells preserved. Details of the planting plans are required.
12. The archaeological survey is incomplete and should include all field boundaries (excluding modern fences) and identify suitable crossing areas where the boundaries are already degraded. Additional survey may be required to record features that were missed. More detailed archaeological mitigation proposals are required. This information should be included in the revised proposal for public consultation.
13. Watercourse management and flooding further downhill needs to be assessed and a report with mitigation measures produced.

Contact Addresses

Scottish Forestry	Tom Davies Senior Operations Manager Perth and Argyll Conservancy Upper Battleby Redgorton Perth PH1 3EN Tom.davies@forestry.gov.scot Tel 0300 067 6005 (direct 75332) Mobile: 07879 662 101	Woodland Officer Barry Blackwood Barry.blackwood@forestry.gov.scot Mobile 07867 156 621
Scottish Woodlands	Barry Harper Senior Forest Manager Sandpiper House Inveralmond Industrial Estate Ruthvenfield Road Perth PH1 3EE Barry.Harper@scottishwoodlands.co.uk Tel 01738 448 584 Mobile: 07717 216 883	Jamie Reith Business Development Manager Tel: 01738 625 128 M: 07768 546 275 jamie.reith@scottishwoodlands.co.uk

Appendix 1 – Forestry Advice and Guidelines

<https://forestry.gov.scot/publications/373-scotland-s-forestry-strategy-2019-2029/viewdocument>

<https://www.confor.org.uk/media/79616/ukforestry-standard.pdf>

<https://www.confor.org.uk/media/246576/stakeholder-engagement-guidance-note-dec-2015.pdf>

<https://forestry.gov.scot/publications/104-environmental-impact-assessment-for-forestry-projects/viewdocument>

<https://forestry.gov.scot/publications/191-environmental-impact-assessment-report-content/viewdocument>

<https://forestry.gov.scot/publications/support-and-regulations/109-woodland-creation-application-guidance>

<https://forestry.gov.scot/publications/352-managing-woodland-access-and-forest-operations-in-scotland/viewdocument>

<https://forestry.gov.scot/publications/17-developing-native-woodland-habitat-networks/viewdocument>

<https://forestry.gov.scot/publications/30-forest-operations-and-birds-in-scottish-forests/viewdocument>

<https://forestry.gov.scot/publications/29-forest-operations-and-wildlife-in-scottish-forests/viewdocument>

<https://forestry.gov.scot/publications/68-forests-and-historic-environment-information-and-advice/viewdocument>

<https://forestry.gov.scot/publications/72-historic-environment-resource-guide-for-forest-and-woodland-managers-in-scotland/viewdocument>

<https://forestry.gov.scot/publications/71-identifying-the-historic-environment-in-scotland-s-forests-and-woodlands/viewdocument>

<https://forestry.gov.scot/publications/69-scotland-s-woodlands-and-the-historic-environment/viewdocument>

<https://forestry.gov.scot/publications/559-case-study-why-plant-trees-on-farms/viewdocument>

<https://forestry.gov.scot/publications/189-woodland-creation-processing-agreement-information-note/viewdocument>

<https://forestry.gov.scot/publications/662-template-woodland-creation-processing-agreement/download>

<https://forestry.gov.scot/publications/188-selection-criteria-for-screening-forestry-projects/viewdocument>

<https://www.argyll-bute.gov.uk/woodland>

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CONFOR Stakeholder Engagement Advice Posted Separately

Appendix 2 – Email correspondence

Wed 30/10/2019 11:46

Barry.Blackwood@forestry.gov.scot

RE: Woodland Creation – Rhu

To: Barry.Harper@scottishwoodlands.co.uk

cc:Stuart.Watson@argyll-bute.gov.uk;iain.quercus@btinternet.com;
secretary@rhuandshandoncommunity.org;Tom.Davies@forestry.gov.scot;
firatachaeology@googlemail.com; convener@rhuandshandoncommunity.org

Hi Barry,

When Jean Cook responded to your email from July, we have noted a line within your original email which we did not originally pick up on but we feel we should take a few minutes to clarify.

“We have also consulted the Forestry Commission, or Scottish Forestry as they are now, who are generally in favour of planting this site so long as due diligence is carried out. This includes both the survey work highlighted above along with consultation with the local community and council to gauge opinion”.

While I think that this was not necessarily intended by you as endorsement by Scottish Forestry and instead is simply a matter of the interpretation of your wording, we feel there is a potential for this to be misunderstood.

I would just like to highlight to those within this email that our approach to any woodland creation enquiry of this type which we receive is to simply outline the potential for woodland creation based on an initial desk based assessment of site sensitivities and forestry policy. This is our standard approach for pre-application consultation responses where we aim to provide any clear constraints and opportunities which the site might hold. We do not aim to provide assurances or endorsement but depending on what the site opportunities or constraints are our response could be considered in more positive or negative light. This proposal is still at the very first stage of due diligence and would be subject to screening under Environmental Impact Assessment (EIA) regulations before it could proceed.

In case anyone is not aware, ‘Due Diligence’ is the term we use for assessing a site for afforestation and is the responsibility of the applicant. This includes site assessment and data gathering, ensuring UKFS compliance and engaging with Scottish Forestry, neighbours and consultees. This process should inform whether a site is appropriate for afforestation and if so what type of woodland would be best suited. This is a relatively new approach (since 2018) and is outlined in our [Woodland Creation Application Guidance](#). The key intention of this is to ensure consultees and neighbours are informed of proposals and involved in the discussions from the very beginning rather than only becoming aware during the Statutory consultation period where the design is quite far on.

So that there is complete transparency for those involved, I have taken an unusual approach and attached my pre-application response.

Kind Regards

Barry

Barry Blackwood
Woodlands Officer
Scottish Forestry
Upper Battleby, Redgarton, Perth, PH1 3EN
Direct: 0131 370 5289 Mobile: 07867 156 621 Website: forestry.gov.scot

Mon 29/07/2019 13:39

Barry.Blackwood@forestry.gov.scot

RE: Woodland Creation – Rhu

To: Barry.Harper@scottishwoodlands.co.uk

Hi Barry,

Please find my pre-application response for the enquiry above Rhu below:

Summary

While the site has potential for woodland creation, this is not necessarily at the extent outlined on your location map as **a significant proportion of the site is identified as ‘Sensitive’ within the local forestry strategy**. Any design must be sensitive to amenity, visual and environmental issues. At this point I would encourage you to continue with Stage 1.2 Due Diligence as outlined in the Woodland Creation Application Guidance. Immediate investigation should be made into why a significant proportion of the scheme is sensitive within the local forestry strategy.

There is good opportunity within a landscape context to extend Highlandman’s Wood with conifer along the higher ground. The lower ground appears to be reasonably fertile which should provide opportunity to deliver mixed benefits within the scheme as a whole. Given the proximity of the scheme to Rhu and Helensburgh there is an opportunity for the scheme to be designed with a multi-use forestry approach in mind. A balanced scheme which delivers multiple objectives will be likely better received and supported by the community.

Finally I would encourage you to speak to all stakeholders and neighbours during the Due Diligence stage and add their comments to the Issues Log which forms part of the Woodland Creation Operational Plan Template. Please seek to engage more people, communities and businesses than previous as a Priority Action under the new Scottish Forestry Strategy.

Local Forest Strategy

The site lies within the Helensburgh, Gareloch & Roseneath Landscape Zone of the Argyll & Bute Council Woodland & Forest Strategy (2011). The strategy indicates that the site is split within a ‘Preferred’ and a ‘Sensitive’ area for woodland expansion. You should identify why areas are listed as sensitive, it appears that some of this corresponds to archaeology but a good place to start would be with the local authority to identify the sensitivity and potential for a sensitively designed woodland creation scheme at this location. You can view the split in more detail on the interactive map available at: <https://argyll-bute.maps.arcgis.com/apps/webappviewer/index.html?id=a4ef5fe5bae1479b85f4c2d8fbc63b4a>

The strategy discusses that the type of woodland appropriate in this locale should be well designed and sensitive to amenity, visual and environmental issues. It further states that opportunities should be taken to develop habitat networks linking the site with the native woodland rising up from the shoreline seeking to incorporate any fragmented pockets of native woodland.

The proposal is in close proximity of Helensburgh and Rhu and thus would require sensitive planning and handling of amenity, landscape and environmental issues. The proximity of woodlands to urban populations means that access and recreation are fundamental issues and provide a major opportunity for community engagement.

National Forest Strategy

Scotland’s Forestry Strategy lists six priorities for actions. Those relevant for to this proposal are ‘Expanding the area of forests and woodlands, recognising wider land-use objectives’ and ‘Engaging more people, communities and businesses in the creation, management and use of forests and woodlands’.

Ornithology

Consultation with RSPB and ARSG should help identify local ornithological sensitivities. In regards to RSPB, Allison Phillips has relocated to Inverness and the contact is currently Andy Robinson. Initial consultation is important to identify local site sensitivities, it would be useful to follow this up with a planting design and proposed mitigation regarding any issues raised for further feedback.

Priority Habitats

The proposal will require an Extended Phase 1 Habitat Survey with targeted NVC types. This should include target notes which identify areas of Priority Habitat and provide an assessment of their condition and importance with recommendations based on their value. Any areas of Priority Habitat should then be excluded from the planting area.

Soils

Contiguous areas of deep peat greater than 50cm in depth and greater than 0.25(ha) should be identified on a map as OL. Smaller pockets under 0.25 should be acknowledged in the Ops Plan, buffered on the ground and density increased within eligible planting areas to account for the lost ground. The site should also be surveyed for soil type, to identify what tree species would be suitable.

Archaeology

I identified three unscheduled monuments within the boundary of the site and 1 on the edge. Please consult with WOSAS to identify potential features of interest. An archaeological walkover survey by a trained professional is likely to be required for a proposal of this scale in an upland setting.

Landscape

The design should be a good fit with landform and sensitive to visual impacts as outlined within the local forest strategy. Shape and scale of design should reflect topography, existing woodland and provide cohesion with adjacent design plans. The scheme will be prominent from the Rosneath Peninsula, please agree viewpoints as visualisations will be required. I think there is an opportunity for a well-designed scheme to contribute to the landscape by tying into Highlandman Wood which currently sits quite isolated but not uncomfortably on the hillside.

Timber Transport Routes

It will be important to demonstrate a reasonable means of access. An alternative to proposing hauling through Rhu would be a benefit and it will be interesting to discussions on this develop.

Kind regards

Barry

Barry Blackwood

Woodland Officer

Scottish Forestry

□ Upper Battleby | Redgorton | Perth | PH1 3EN

□ Direct: 0131-370-5289

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Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

From: Barry Harper <Barry.Harper@scottishwoodlands.co.uk>

Sent: 05 July 2019 15:13

To: 'Fiona Baker' <firataarchaeology@googlemail.com>; Peter Knox <peter.knox@btinternet.com>; 'Jim Duncan' <convener@rhuandshandoncommunity.org>

Cc: Watson, Stuart <Stuart.Watson@argyll-bute.gov.uk>; 'Iain Catterwell' <iain.quercus@btinternet.com>; Jean Cook <secretary@rhuandshandoncommunity.org>;

Blackwood B (Barry) <Barry.Blackwood@forestry.gov.scot>

Subject: Woodland Creation - Rhu

Good afternoon,

Over the passed few months we have been working with our client at Highlandman Plantation, just outside Rhu, on the prospect of extending the woodland out to the west over ground on both Letrault & Stuckenduff farms. This would be a commercial proposal being based primarily on Sitka spruce but will also include areas of other conifers, native broadleaves and open ground to create a mixed woodland with multiple benefits.

As is evident from Highlandman, the opportunities over timber are easily evident, with many people enjoying the benefits the woodland provides and any extension would provide additional access for the public. While the proposal will include a deer fence around the perimeter, we will be adding gates, stile's etc. to ensure access for the public. Any current routes will be identified with access maintained.

To date we have carried out a number of surveys including Archaeology, Bird, Vegetation and Peat surveys over the site with a brief description of findings below:

- Archaeology:
 - 6 locations within the proposed planting areas that require buffering from planting
 - Consultation will be sought from the local council as to extent of buffer required.
- Birds:
 - Surveys for breeding birds, Raptors and Black Grouse has been carried out with lek sites within the planting boundary located.
 - Concern was raised over Hen Harrier and Merlin however none have been found on site with habitat identified as being unsuitable on the whole for these species
 - Black Grouse lek's will be located, buffered and discussed with RSPB to ensure protection.
 - No other concerns were raised from bird surveys.
- Vegetation:
 - A survey was carried out to identify any areas of important habitats and vegetation including assessment of their condition & conservation status.
 - Findings revealed areas of M6d acid flush & M23a marshy grassland are present of moderate species-richness, evenness & distinctiveness.
 - GWDTE (Ground Water Dependent Terrestrial Ecosystems) are present but of low species-richness, evenness & distinctiveness
 - As a result the findings do not pose a constraint to tree planting.
- Peat:
 - A survey covering the whole site for peat has been undertaken with areas of >50cm depth removed from the planting scheme.

LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

- Deep peat poses a constraint to tree-planting and is generally limited to the uppermost parts of the site.

We have also consulted the Forestry Commission, or Scottish Forestry as they are now, **who are generally in favour of planting this site so long as due diligence is carried out. This includes both the survey work highlighted above along with consultation with the local community and council to gauge opinion.**

From the start of this I am aware the main concern with regards this proposal is the future extraction of timber from the site as the current haulage route is the existing access out through Highlandman, and as such Rhu village which has proved controversial despite all operations going as planned. With this in mind we have been in discussion with the neighbouring estate to discuss a possible access route to the east eventually emerging on the A818 north of Helensburgh, a route previously put together to service a proposed wind farm that failed to get approval.

Discussions have been held with the estate and we are hopeful this will be agreed as it would not only facilitate this proposal but also future harvesting from Highlandman which would remove haulage from through Rhu in the future. Currently this is only under discussion however I would hope this will progress and if the route can be agreed, this will be put in place prior to any future harvesting at Highlandman.

Watch this space on this one but if this can be arranged it will benefit all concerned.

In the meantime I would be grateful if you can get back to me with comments regarding the proposal in general.

Kind regards,

Barry

Barry Harper | Senior Forest Manager

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LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

Tue 29/10/2019 01:10

Fiona Baker fiona@scottish-archaeology.com

To: 'Barry Harper' <Barry.Harper@scottishwoodlands.co.uk>; 'Fiona Baker' <firataarchaeology@googlemail.com>; 'Jim Duncan' <convener@rhuandshandoncommunity.org>

CC: 'Watson, Stuart' <Stuart.Watson@argyll-bute.gov.uk>; 'Iain Catterwell' <iain.quercus@btinternet.com>; 'Jean Cook' <secretary@rhuandshandoncommunity.org>; barry.blackwood@forestry.gov.scot

Dear Barry

Further to our recent meeting thank you for sending the full EIA reports for Stuckenduff and Letrault through. These will be assessed by the members of the Community Council with the most relevant knowledge but they will of course not be circulated outside the CC. However, in due course we expect there to be a broader community consultation on these proposals as per the CONFOR guidelines.

I am sure we have all learned from the Phase 1 Highlandman's Wood felling operation that clear communication, community consultation and liaison from all parties from the outset regarding the Letrault and Stuckenduff proposals and further phases of work at Highlandman's will ensure that many of the difficulties we have experience can be avoided.

We note that this correspondence is a preliminary notification seeking the CC's initial view to the proposed afforestation of Tom na h- Airidh at Stuckenduff and Letrault as shown on the supplied map. The CC are not in principle opposed to afforestation of the Letrault and Stuckenduff hill land but we will require some time to study the documents you have provided and must of course hear the views of the communities we represent, via a public information and consultation event, before reaching a formal view and response.

The main immediate area of concern to residents is, as you are aware, the movement of timber lorries through the village on Pier and Station Roads. While we are aware that there is currently no other option and the timber lorries have the same legal right to use the roads as anyone else, it is the CC's view that these roads are unsuitable. Whilst the CC appreciates the economic and other benefits of commercial forestry, and the limited opportunities for hill farms, the CC would not be able to support a proposal that utilises Station Road and Pier Road for timber extraction. The residents that we represent have made this very clear and it is essential that an alternative solution is found.

We welcome the indication that an alternative route across Luss Estates land might be possible. We understand the suggestion is to use the proposed windfarm route. Please note that this area is a designed landscape dating to 1732. It is possible to route a track across it but care would need to be taken to avoid the banks and utilise already existing breaches so as to preserve them as best as possible. You already have some information and maps relating to the designed landscape from our initial response letter to the Highlandman's Wood felling. We can provide further information but careful design of any track across this area is required.

We would also be interested to know what other options have been explored for extraction of the timber. As mentioned at our meeting the CC would like to know if rail has been considered for timber extraction with funding from the Strategic Timber Transport Scheme (STTS). You indicated that it is highly unlikely that this could be achieved but we would be grateful if you could give us a detailed response on this as considering the Letrault scheme borders the West Highland Railway line on paper it looks like a good solution.

LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

We would note that if the land is planted we would wish to see recreational walking paths linked to existing formal and informal paths included in the design as this would increase community benefit. We note you have commented on recreational access below.

Following on from our recent meeting at Highlandman's please could you provide a timetable and information on the current and future works on the hill regarding brash clearance, replanting and timescales including the next proposed felling phase. The CC would also like an update on what mitigation measures have been undertaken regarding the notified water courses, historic environment and path access issues.

Regards

Fiona

Fiona Baker

For Rhu and Shandon Community Council

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Tel: 01436 820 334
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LETRAULT and STUCKENDUFF AFFORESTATION PRELIMINARY COMMENTS

From: Barry Harper [<mailto:Barry.Harper@scottishwoodlands.co.uk>]

Sent: 21 October 2019 08:47

To: 'Fiona Baker' <firataarchaeology@googlemail.com>; Peter Knox <peter.knox@btinternet.com>; 'Jim Duncan' <convener@rhuandshandoncommunity.org>

Cc: Watson, Stuart <Stuart.Watson@argyll-bute.gov.uk>; 'Iain Catterwell' <iain.quercus@btinternet.com>; Jean Cook <secretary@rhuandshandoncommunity.org>; barry.blackwood@forestry.gov.scot

Subject: RE: Woodland Creation - Rhu

Good morning,

Following on from our meeting at Highlandman, where we discussed the delay in a response from the community council with regards the proposal at both Letrault & Stuckenduff, I realise you may have been under the impression this email might have been your only chance to respond to the proposal and that you felt you weren't given enough information to make an informed response. I can confirm that this email is a pre-consultation enquiry that will be used to inform us of any concerns you may have on the proposal and will influence the final design before moving forward to more official consultation through Forest & Land Scotland.

I also note from our consultation that you would like to see the reports regarding the site and while I have no concern forwarding these can I just make clear that these reports are not for wider distribution and should not be passed further without prior consent from Scottish Woodlands.

As I mentioned to Fiona at our meeting at Highlandman, we are looking to move forward on this and if this goes forward we would likely be starting work this time next year.

Do let me know any question in the meantime and I look forward to hearing back in due course.

Kind regards,

Barry

Barry Harper | Senior Forest Manager

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