

RHU & SHANDON COMMUNITY COUNCIL

Ewan Young,
Woodland Officer,
Scottish Forestry,
Perth & Argyll Conservancy,
Upper Battleby,
Redgorton,
Perth, PH1 3EN



secretary@rhuandshandoncommunity.org

1/11/2024

Forest Plan Name: Luss Estates South
Forest Plan Reference: 23FGS73874

Dear Mr Young,

Thank you for your letter via email of 27th September 2024 requesting consultee comments for the above long term forest plan and attached maps. Thank you also for extending the time period for our response as Appendices 10 – 19 were submitted later.

Rhu & Shandon Community Council (R&SCC) were sent a consultation letter by Chris Dacre of RDS Forestry on 18 October 2023 and attached is a copy of our reply dated 22 November 2023. In broad terms the main points of our letter are covered in section A.4 Stakeholder engagement. Concerns regarding Ancient Woodland Inventory and protection of woodland and woodland floor should be included in this list and referenced within the document. Similarly, concerns regarding species selection should be included in the main points covered by scoping with stakeholders.

R&SCC would like to acknowledge the helpful nature of communications with Chris Dacre of RDS Forestry. Replies to enquiries have been prompt, clear and helpful. Overall, the content of the LTPF meets with many of the points of concern that we previously raised in our letter of 22 November 2023. We would like to take this opportunity to reinforce a few of these points as well as raising some more specific comments in relation to forest management and its regulation now that we have access to the submitted LTFP documentation.

Abbreviations

A general point is a difficulty we have experienced as a result of the use of abbreviations within the plan and in particular on the attached maps. Despite extensive searching of your guidance for use of abbreviations within forestry we have been unable to identify some that have been included. We refer to appendix 3 <https://www.forestry.gov.scot/publications/132-long-term-forest-plans-applicant-s-guidance/viewdocument/132>

and

<https://www.forestry.gov.scot/publications/185-species-abbreviation-list/viewdocument/185>

In order to be able to understand all aspects of what is proposed in the plan it would be helpful to have a complete list of the abbreviations used.

Long-term Vision for LTFP

Section A.5 describes the long-term vision of Luss Estates and RDS Forestry for the LTFP. The statement that the main vision is “to produce a high-quality commercial woodland” is felt to be too restrictive. As over 50% of the woodland area is listed for retention and most of this is NBL trees it would be preferable to prioritise a long-term vision that includes conservation, enhancement and protection. Also, a long-term aim might be to better identify and catalogue the Ancient Woodland Inventory with protection of this AWI and its forest floor.

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Hydrology and Pollution Concerns

Sections A.6.4 Hydrology, B.1. Constraints and Opportunities, C.2.1. Felling, C.2.5. Restocking Proposals, and C.2.17 Other – Private Water Supplies (PWS), all make mention of the importance of the private water supplies, the multiple tributaries within Glen Fruin, Fruin Water, and the drainage into Loch Lomond. Despite this, there is little mention of the need to assess, protect and enhance the biodiversity of aquatic life within the area covered by the LTFP. The mentioned protection of the PWS is mainly linked to graduated felling phases and increased buffer zones with protection of infrastructure. We welcome the commitment to apply greater than standard precautions and protections against potential contamination of water courses as stated in C.2.1. However, there is no mention of the need or measures for prevention of contamination of water from the use of fertilisers, insecticides or pesticides. Indeed, in section C.2.6 Protection there is mention of the need for control of weevil at the restructuring phase without any mention of what chemicals or methods will be deployed. We have serious concerns about the impact of the use of chemicals, even when applied within UKFS guidance. Particularly concerning is the impact of those used for weevil control on water quality and aquatic biodiversity. There are well known adverse links between these chemicals used in the forestry industry and the health of humans, unborn fetuses, birds, deer, butterflies, bees, insects, amphibians, shellfish and fish. This is an operational matter of such importance to us that we request the inclusion of a detailed chemical, insecticide and pesticide operational plan within the LTFP.

Salmon Scotland's "wild fisheries fund" is restoring 12 sites along the Fruin Water with £23000 grant funding for Loch Lomond Angling Improvement Association. As well as chemical pollution, forestry has the potential for adversely affecting the aquatic environment by well documented changes in water run-off times, heightened peak river flows and acidification of the water. It would be a pity to witness all their efforts undone by the impact commercial forestry has on water quality and aquatic biodiversity. R&SCC wonders if the importance of this work could be valued, supported and referenced in the LTFP.

In light of the recent oil line leakage in Glen Fruin, R&SCC is particularly concerned about the potential for contamination of PWS for human consumption within the corridor of Glen Fruin. We seek confirmation that none of the pyrethroid or neonicotinoid chemicals will be used on any reforestation / restocking within the LTFP for Luss Estate South. We request that the specific measures to be deployed for control of pine weevil are included within this LTFP. This should include adhering to the Hylobius Management Support System as well as adhering to the latest research. Specifically, we additionally seek assurance that acetamiprid is also not used within any potential catchment area for drinking water supplies i.e., anywhere within Glen Fruin. Please add an appendix listing and detailing deployment methods and weather conditions restrictions for timing of application, for all chemicals to be used within the remit of this LTFP. R&SCC will request a similar approach be taken for the Blairnairn NWC scheme as a large part of this is restocking previously felled woodland. We seek assurance that SEPA will be notified in advance of the application of any chemicals to land whose drainage has the potential to affect PWS.

R&SCC requests that the relevant sections of the LTFP detail these measures within the LTFP as the commitment in the LTFP is to go above and beyond UKFS guidance.

References:

Moore, R. 2018: *Hylobius Management Support System (MSS)*

<https://www.forestresearch.gov.uk/tools-and-resources/tree-health-and-protection-services/hylobius-management-support-system/>.

Willoughby, IH. et al 2020. Forestry: An international Journal of Forest Research Vol 93, Issue 5, Oct 2020 p694-712. Are there viable chemical and non-chemical alternatives to the use of conventional insecticides for the protection of young trees from damage by the large pine weevil *Hylobius abietis* L. in UK forestry?

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Species Selection- Sitka Spruce

Section C.2.5. deals with restocking proposals and Table 5 lists restocking proposals for the first 10 years. Commercial conifer restocking is almost exclusively with Sitka Spruce and of all restocking, 85% is with Sitka Spruce. SS crop rotation is 45 – 50 years minimum and we are now at a critical point in time for SS planting in Scotland due to the emerging threat from *Ips Typographus* (8-toothed spruce bark beetle). We refer to two recent government press releases:

a) Landowners urged to be on the lookout for signs of the eight-toothed spruce bark beetle (3 October 2024) and

b) New restrictions to limit impact of *Ips Typographus* tree pest (8 October 2024). No new SS is allowed to be planted in the south east of England. *Ips Typographus* has recently also been identified in Wales and in Scotland at Grangemouth. This very recent press release confirms *Ips Typographus* has been found in Scotland: <https://www.forestry.gov.scot/news-releases/blog-scottish-climate-week-special-ips-typographus>. There is rationale for restricting SS planting, both with the economic interest of the landowner in mind and the wider public interest as when *Ips Typographus* arrives in Scotland it will seriously impact the SS component of this LTFP. Plant Health Centre Scotland (PHCS) publication, "Impact of climate change on the spread of pests and diseases in Scotland" indicates the extent of these economic losses that could occur when the pest arrives. The PHCS is about to publish this report: "Assessing the long-term resilience of Scottish Sitka Spruce forests to climate change and novel pests. A bark-beetle case study". Changes are therefore required to planting and management strategies for both the LTFP and planned NWC schemes of Luss Estates in order to minimise the threat from climate change and *Ips Typographus*.

Timber Haulage Routes

We welcome the comments in Section C.2.9. Public Access. R&SCC members are acutely aware of the problems caused by the approval and use of unsafe Timber Haulage Routes. The LTFP acknowledges that there will be a requirement to use the Severely Restricted Route (SRR) involving the minor Glen Fruin roads. R&SCC welcomes the commitment given to consult us prior to any use and we hope that any input from RSCC will be incorporated into planning the use of these unsuitable routes.

Biodiversity of Woodland Floor

C.2.11 Biodiversity. R&SCC would like to see referenced the need and measures proposed to protect and enhance the aquatic, amphibious and insect biodiversity within the LTFP. Reference should be made to measures to be taken to protect and enhance woodland floor biodiversity within the LTFP, particularly in the AWI and NBL woodland areas.

Invasive Species

A.4. Stakeholder Engagement incorrectly refers to LTFP reference C.2.11 which should be referenced as C.2.13. for the issue of INNS. The commitment to take steps to control Rhododendron and Sitka Spruce is welcome. We would like to see included identification and control of invasion by knotweed and other commercial conifers such as Western hemlock, Lodgepole pine and Norway Spruce. Riparian zones of NBL should be included in the priority areas for the control and removal of invasive species.

Archaeology

The archaeological report has been examined by a professional archaeologist who is a member of R&SCC. We consider the archaeological survey report and mitigation measures of a 5m buffer zone around all identified archaeological sites to be an adequate and satisfactory level of pre-forestation assessment and appropriate mitigation. Pre-forestation survey can only identify surface remains. Whilst there is no immediate requirement for further archaeological survey, following ploughing or mounding ground disturbance we suggest the North Clyde Archaeological Society are invited to undertake further walk over survey on a voluntary non-commercial basis.

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Such walk over surveys of land prepared for afforestation frequently identify traces of buried prehistoric activity which make a valuable contribution to our understanding of the historic environment and prehistoric settlement patterns.

Thank you for taking into consideration the points we raise above. R&SCC requests that we are provided with the opportunity to review and comment on any revised draft LTFP before it is finalised and agreed between Scottish Forestry and the landowners / RDS Forestry.



Jean Cook
Secretary, Rhu & Shandon Community Council

Copied by email to:

Members of the Rhu & Shandon CC
Lomond North Councillors: Maurice Corry, Iain Paterson, Mark Irvine
Helensburgh Community Council,
Argyll & Bute Council (Planning, Access, Roads) Argyll TTG,
SEPA,
Scottish Water,
RDS Forestry, Chris Dacre
Gareth Bourhill, Secretary, Loch Lomond Angling Improvement Association

Enclosed: RSCC letter to RDS Forestry: 22 November 2023