

RHU & SHANDON COMMUNITY COUNCIL

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Re: Commercial Forest creation at Letrault and Stuckenduff farms

Following the breach of regulations by Scottish Woodlands (SW) under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 for the new forest road works at Letrault Stuckenduff woodland creation, Rhu and Shandon Community Council (R&SCC) would like to express additional concerns with regard to the road and the wider woodland creation.

SW have ignored regulations from the outset; early building of road, not adhering to best practice guidance for new forest development (vertical linear cultivation on the slope) and preventing public access to the land. It is therefore only reasonable that the Community Council would now like to check the information that SF relied upon to make their decision with regard to the scope of the EIA Screening processes for the environmental impact of both the forest road and the new commercial forest development.

We have 4 key areas of concern:-

1. Archaeological Report lacking in essential detail

Issue: Previous archaeological reports from R&SCC have provided more detail on the history and archaeology of the sites yet this has not been incorporated into the EIA Screening Opinion. We realise that a further archaeological survey has been completed,

2. Water Run off - Has sufficient attention been given to the risk of downstream flooding? None of the EIA Screening Opinion Requests (decision in relation to the woodland creation scheme and the enforcement notice in relation to the roadbuild) make adequate mention of the impact of these schemes on downstream flood risk.

It should be noted that the lack of silt traps and the consequent silting of Rhu Burn occurred during SW's upgrading of the adjacent Highlandman's and Torr forest roads. Later when felling was taking place in the Highlandman's and Torr forests, R&SCC had to contact SEPA with regard to brash being dumped in Glennan Burn. This effectively created dams and caused major silting issues with flooding of the riparian zone and erosion, which led to heavy silt burdens further down the burn in Helensburgh. **SW's track record on water management is demonstrably poor so we have justifiable concerns.**

Issue: The burns and infrastructure already struggle to cope with current water levels. Any increase in water run-off from the hill will significantly increase the likelihood of flood

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damage to residential property, floods and road blockage of A814 and flooding, landslides gravel run off onto West Highland Railway line.

Key Points to consider:

a) The unauthorised road build runs diagonally up the slope across multiple tributaries which merge into the Aldownick burn at the bottom (SE) downhill corner. The majority of roadside ditches channel water in this direction. The course of the road is across ground which usually has high water storage capacity. Below the road is a steep slope with poor water retention and fast run-off.

b) Below the wood there are three key features which significantly increase flood risk; the West Highland Railway line, a disused railway embankment, and the raised bund of the coastal road. As a result, natural soakage to the sea from the hill to the sea is restricted and channelled into three key burns and a few culverts (Chapel burn, Aldownick burn, Linn burn).

c) Current 4WD tracks at Stuckenduff farm (starting just below the new forestry site) already cause issues with increased run off. These tracks mean that any additional water can very quickly run into existing watercourses. Argyll and Bute have issued an enforcement notice on a landowner because of excessive water runoff from his land which sits between Highlandman's forest and the railway line.

d) In recent years there has been a well-documented body of evidence to show the increasing frequency and severity of these flood events. Local residents have resorted to using kayaks to exit their properties! Recent issues with water run-off include damage to residential properties, road blockage and closure on the A814, and flooding, landslides and gravel run-off onto the West Highland Railway line.

e) Mention is made in the EIA Screening Opinion Request Form that monitoring of the watercourses will be adhered to by SW. This is only loosely defined as "ongoing monitoring of the property, roads and silt traps will be carried out as part of routine maintenance, i.e. inspecting and clearing silt traps etc where/when required." The reservoirs are now visibly cloudy, possibly from silt and the worry for the future is the leaching of chemicals or pesticides into water that is used recreationally. Certain forestry insecticides are known to be toxic to aquatic life. Document "SWL Guide 6.04 Monitoring Water Quality" is referenced but R&SCC do not know what this document contains.

f) Despite the UK Forestry Standard best practice guide for "Designing and managing forests and woodlands to reduce flood risks, SW are in the first phase of ground preparation and planting on the steep slope with poor water retention using long, vertical cultivation channels over a large area and the deployment of heavy machinery. The destruction of the peat layer on the upper slopes will reduce the water storage capacity above the lower slopes with lower volume water retention.

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3. **Movement of forestry vehicles, construction materials and timber.** The EIA Screening Opinion Request Form submitted by SW fails to present an accurate picture of the impact on the local population.

Key Points:

- a) The “agreed” TTMP with restrictions remains very contentious with the local population. R&SCC continue to form and present the case for discontinuance of the route through the steep slopes and narrow roads of Rhu village. These arguments were well versed for the single issue of timber extraction from the neighbouring Highlandman’s wood.
- b) Adding a new planted 202.29ha forestry scheme alongside the replanting scheme in Highlandman’s wood very significantly changes the nature of this debate. SW argues in mitigation that they will adhere to the existing TTMP. This is a completely inadequate way to address these pre-existing issues. It is simply not acceptable to add this amount of haulage to an agreed TTMP without more detailed mitigation in place.

4. **Trees Species Selection**

New native tree planting in coastal west central Scotland should be an opportunity to tackle natural loss by creating biodiverse habitats which expand and protect existing mature native & ancient woodland and waterways. A far more diverse pallet of native broadleaf trees species is needed at Letrault and Stuckenduff including oak, dieback resistant ash, alder, birch, sweet chestnut, lime, maple, hazel, rowan, hawthorn, blackthorn, alder, crab apple, cherry, black poplar, aspen, yew, willow, juniper, holly. All of these trees are growing in Aldownick Glen or in nearby woods. SF has been warning for years that sitka spruce is highly invasive, and is one of the top five threats to the natural world. The current plan calls for 57.88% of the planted areas in Letrault and Stuckenduff to be sitka spruce. Self-seeding/wilding from invasive non-native (INNS) plantation conifers are “pollution” and “a menace” according to a SF officer.

Gresham House and SW are leaving themselves wide open to future legal action by not factoring in existing evidence from scientific studies in the UK and around the world that Invasive Non-Native Species conifer monocultures are a major threat to indigenous biodiversity and communities.

Requested Next Steps

- 1. **R&SCC request that the decision that no EIA be required for the new forest development be revisited in light of the above.**
- 2. **The reason for the Enforcement Notice should be widened.** The lack of, and accuracy of, any archaeological report needs addressed. The failure, by SW, to accurately assess or mitigate against the wider environmental impact on the local community calls into question the validity of both EIA Screening Option processes.
- 3. **Delay further work until there is a safe entry and extraction route.** SW have applied for a Preparatory Project Grant to fund a detailed exploration of an alternative haulage route for both forest schemes. Reference to this should be included and permission to build the current road scheme should only be given once the

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discussions with SF and the Strategic Timber Transport Scheme is complete (approval and funding). If the current haulage route is to be used, there will need to be a renegotiated set of restrictions applied and agreed with the local community.

4. **When work is ongoing, SW to confirm in writing with follow up audit by SF that the scheme will follow the UK Forest Standard best practice guide for “Designing and managing forests and woodlands to reduce flood risks”**

Specifically, but not exclusively

Key measures to minimise the risk of increasing flood flows when cultivating soils within catchments draining to nearby communities or assets at risk of flooding are:

- Avoid large-scale use of cultivation techniques that create linear channels, particularly sloughing,
- For small-scale use, limit lengths of linear cultivation channels by installing regular 2-5m wide breaks, for example every 40m on moderate (11-18 degree) slopes and 70m on gentle (6-11 degree) slopes.
- Follow good cultivation practice as described by the UKFS and supporting guidance.”

5. **Regular measurement of flow rates and water quality prior to, during and after road building and planting.**

- Confirm that the synthetic pyrethroid insecticides alpha-Cypermethrin and Cypermethrin will not be used.
- Define what parameters will be used to ensure adequate monitoring of the water quality, silt levels and flow rates at peak times, in the reservoirs and the named burns.
- Provide access to data log books to reassure the population affected.
- Notify RSCC prior to the application of any chemicals insecticides or pesticides to the land and the nature and timing of the application.
- Provide a copy of the document "SWL Guide 6.04 Monitoring Water Quality"

6. **Explain what mitigation works are being undertaken in the light of the Archaeology Reports provided by R&SCC and North Clyde Archaeology Society.**

The new forest road, built without authorisation, has already impacted on archaeological remains highlighted to SF and SW with no mitigation in place. This raises further concerns that the other archaeological sites identified in the unsatisfactory Guard survey report, may also be damaged or destroyed.

Jean Cook.

Jean Cook
Secretary, Rhu & Shandon Community Council

Copied by email to

Members of the Rhu & Shandon CC

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