

RHU & SHANDON COMMUNITY COUNCIL

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14th February 2024

RE: Commercial Forest Creation at Letrault and Stuckenduff Farms

Dear Emma

Thank you for your email of 21st December 2023 responding to the letter from RSCC of 17th December 2023. Your assistance with answering our concerns regarding the new woodland developments at Letrault and Stuckenduff farms is much appreciated. Regarding your response we have a number of comments and follow up points:-

- 1) **Public Access:** The Woodland Creation Operational Plan (WCOP v11 June 2021, Ref 163 948) refers to "both field and self-closing gates will be added to facilitate access, not only for management works but also to allow the local community to enjoy outdoor recreation". The topic has been discussed extensively with Mike Page of Scottish Woodlands. The concerns raised were
 - a) pedestrian gates had not been put in (next to the vehicle gates).
 - b) Vehicle gates on boundary with Stuckenduff farm were locked with no alternative means of access provided.
 - c) Not all the gates had been built in the fence per plans (only 5 of 7 built).
 - d) There were no access points at the top of the forestry into the Loch Lomond National Park.

Mike Page / Gresham House agreed with David Lang who lives at Ardchapel, Shandon the following next steps:

To work to get the two planned gates on Stuckenduff farm boundary reinstated (built for future use),

To work to get an additional 4 access points put on NW & NE boundary fences. Final position to be agreed.

To write to all neighbouring landowners explaining the principles underlying the placing of padlocks on Scottish Woodland property.

As of today, none of these agreed improvements have been implemented.

RSCC request that SF make note of the fact that SW have yet to implement the agreed changes to improve local access. RSCC request that SF include these points in any future assessment of SW's implementation of the WCOP

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2) Archaeology –

It is excellent that SF is satisfied that all archaeological features have now been identified and appropriately buffered to protect them from operations. However, your reply does not adequately address the concerns raised by RSCC. There are a number of different archaeological reports and it is not clear to RSCC which features are being protected.

Please can you provide:

- a. A list of these features for our records and to ensure completeness**
- b. Details of the mitigation steps SF have requested SW to put in place for each feature.**

3) Water – flood risk –

The WCOP (v11 June 2021, Ref 163 948) acknowledges that “as the railway is sited directly below the proposal, care will have to be carried out to ensure any change in the drainage on site does not impact this network.” The WCOP states that “drainage will be required, both to assist in tree establishment, and to provide a dry surface for maintenance and access purposes.” Not taken into consideration in the WCOP or the EIA SO application/decision is the existing frequent flooding from this land, affecting the local population. Local residents are all too aware of the flood risk from this land to their properties and road network. Although SF is satisfied that the establishment of the woodland site will not bring about an increased risk of flooding, the communities along the urban strip who are impacted by the current flood risk remain very concerned. The design and development of this woodland and road infrastructure so close to a community already seriously affected by frequent flooding is bound to increase flood risk at certain phases of the woodland’s life time and at times of peak rainfall. RSCC is not reassured by your assertions that “in general there is some evidence that woodlands may provide natural flood management”.

They would ask that a more thorough and professional assessment take place. This needs to consider existing issues and take into consideration recent flood levels and frequency.

RSCC also request that SF acknowledge and document our concerns about the risk posed by this woodland creation to flooding in the urban strip immediately below.

4) Water Pollution

RSCC welcomes your site visit and visual inspection of the water flowing into and adjacent to the 3 reservoirs on Letrault farm. They agree that at times of low flow these waterways appear clear. However, during and immediately after periods of peak heavy rainfall the waters are cloudy and appear to contain silt.

RSCC would therefore like an assessment to take place during and immediately after peak rainfall and high water levels.

What monitoring of water quality in this burn and associated reservoirs is proposed?

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5) Peatland –

RSCC is delighted to hear that SF will check on the peatland assessment as the ground preparation works progress. SF determined on 28/7/2021 that the woodland creation did not require EIA consent. SF stated that the peat survey accurately identified areas of deep peat. RSCC has only been provided with the map of the peat survey which is insufficient information upon which to determine the accuracy of this statement from SF. As mentioned, RSCC believe the extent of peat >50cm in depth across the site is likely to be underestimated on the peat survey maps that have been provided. There are areas with deep peat within the areas of ground already prepared for planting (a simple check was done by members of RSCC using probes which identified areas of peat >50cms in land prepared for planting). RSCC also has concerns that the area in the northeast of Letrault designated for broadleaf woodland planting is largely over 50cms in peat depth. **RSCC requests access to the methodology and raw data obtained by the peat survey in order to better determine the accuracy of the survey used in the determination that EIA consent is not required.**

6) Insecticide

RSCC was pleased to hear from SF that insecticide isn't used in new woodland creation as there isn't a weevil presence on the ground to protect against. RSCC is concerned about insecticide use on this site due to the adjacent deforestation / replanting scheme in Highlandman's wood where insecticides have been used extensively. Pine weevil is capable of translocating 2Km or more. RSCC notes that SF did not confirm that insecticides, chemicals or other pesticides will not be used during the life of the woodland. Large quantities of fertilisers have already been delivered to the site. Some of these are specific for the broadleaf planting which will take place within the riparian zones and the Aldownick Glen in particular.

We have received no information or reassurance that the new woodland creation will not lead to chemical pollution or acidification of the waterways draining from the site, and the Local Nature Conservation area of Aldownick Glen in particular.

Given that the reservoirs are used for swimming by local residents RSCC wishes to have a more in depth understanding of the monitoring of water quality to be undertaken by SW or SF.

- a. **Will there be a need to advise people against using the reservoirs and will signage be required?**
- b. **RSCC also requested a copy of the "SWL Guide 6.04 Monitoring Water Quality" but did not receive this from SF. We repeat this request.**
- c. **Can we have an assurance that insecticides will not be used throughout the life cycle of this woodland, including any re-planting after deforestation?**

7) Timber Transport

SF and SW continue to state that "adherence to the agreed TTMP will ensure that there is no significant effect **on** the local population / community who use the public access road". These comments are misleading and disingenuous when the minutes of the meeting on 6th September 2022 show that SF, SW and ATTG all agreed that, and we quote;

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“RSCC and the local community have legitimate concerns with the current haulage route and every effort will be made to secure a new route that does not make use of village roads”.

As a result of this agreement a successful application was made, on behalf of Gresham House, to the Strategic Timber Transport Scheme for a Preparatory Project Grant to undertake initial planning, negotiations and outline costings for an alternate logging route to the A818.

RSCC requests that SF & SW cease to refer to Pier and Station Road as an agreed route .and in any future documents always reference the RSCC viewpoint that this consultation route is unsafe and not agreed with the local community.

8) Tree Species Selection, Local Nature Conservation Area and Invasive Commercial Conifers

WCOP (v11 June 2021, Ref 163 948) states L&S is subject to a 'Higher Target (planting) Rate' of invasive non-native species (esp Sitka Spruce and Norway Spruce). According to Scottish Forestry's Guidance on Managing Invasive and Non-Native Species (INNS), self-seeding of SS 'can be profuse and early intervention is needed'. NS is also described as problematic. The WCOP excludes vital information on how INNS conifers will be managed to ensure damage to our hill and local environment will be contained within the boundaries of the plantation.

RSCC has a number of questions about the tree selection and environmental impact of the planting.

- 1. What is Scottish Woodlands (plus indeed all future owners and site managers) required to do to ensure INNS conifers and the diseases associated with them do not infest or degrade the neighbouring designated Local Nature Conservation Area at Aldownick Glen - one of the last culturally and environmentally precious fragments of Scotland's historic natural identity that remains in our community - or the deep peat within the plantation itself?**
- 2. Why does the species selected for the fringes of NBL not reflect the full diversity of trees and shrubs present in the area? Is there scope to add species, especially Blackthorn?**
- 3. What is the accepted rate of failure of NBLs?**
- 4. How will Scottish Woodlands ensure NBLs survive droughts and other damaging weather events?**
- 5. What steps are Scottish Woodland taking to ensure the chemicals and fertilisers associated with commercial forestry operations in perpetuity (especially at planting, felling, restocking) do not leach into Aldownick Glen Burn along with the run-off from the new roads? The burn is used almost daily by children from Blairvadach Outdoor Centre.**

9. Birds

WCOP (v11 June 2021, Ref 163 948) states “It is recommended however that all

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works in support of the proposal are carried outside of the breeding raptor season as per the following: Hen harrier (late February to August / September; and Merlin (late March – August inclusive).”

SF confirmed these conditions apply to the woodland creation as per the EIA SO determination that an EIA consent is not required.

However, in an email from Mike Page dated 5 th February it is stated “Planting at L&S has started- the lower fields above Letrault Farm are planted and the ground preparation on the rest of the site continues apace. All work on the site should be completed by late spring.”

SW are therefore planning to undertake ground works during the first 3 months of the breeding season.

1.RSCC requests that SF confirm with SW and RSCC that works should cease by the end of February as per the EIA SO decision.

2.Why have amber listed Short Eared Owls (often seen by locals nesting on the site, and reported to SF) been missed from the list of birds to be protected on the site?

Jean Cook.

Jean Cook
Secretary, Rhu & Shandon Community Council

Copied by
email to Members of the Rhu & Shandon CC
Councillors Maurice Corry, Iain Shonny Paterson, Mark Irvine.