Chapter 12: Forestry

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12 Forestry

12.1 Executive Summary

12.1.1 The forestry assessment includes felling and replanting for the Proposed Development. A total of 3.85 ha woodland loss is predicted.

12.1.2 The assessment includes the baseline conditions within parts of two individual but adjacent forests. The new and enhanced access includes coniferous plantation, which is classed as antiquity 1a, 2a and 3 in the Ancient Woodland Inventory (AWI). The area is also classed as Plantation on Ancient Woodland Sites (PAWS).

12.1.3 The replanting proposals and compensatory planting proposals take account of the disturbance of the AWI soils.

12.1.4 Felling for the two turbines on poorly performing conifer plantation offer the opportunity to restore peatland.

12.2 Introduction

12.2.1 This chapter considers the impacts on the forest and woodland areas affected by the construction and operation of the proposed Giant's Burn Wind Farm (the 'Proposed Development').

12.2.2 This chapter has been prepared by Neil McKay MICFor, Director of Neil McKay Forestry Consultant Limited, a professional member of the Institute of Chartered Foresters (ICF) since 1994 with more than 35 years' forestry practice in the public and private sectors throughout Scotland. Neil McKay has ten years' experience producing forestry inputs for EIA Reports for renewable energy and energy transmission infrastructure developments across Scotland.

12.2.3 Commercial forests are dynamic, and their structure continually undergoes change due to normal felling and restocking by the landowner; natural events, such as windblow, pests or diseases; and external factors, such as a wind farm development. Whilst forestry is not regarded as a receptor for the purposes of the EIA Report the effects associated with felling have been considered in the specialist assessments where relevant. This chapter provides details of felling that will be required for the construction and operation of the Proposed Development. The changes to the forest structure are also described, as well as any forestry waste generated. The forestry proposals are interlinked with environmental effects and this chapter which should be read in conjunction with the following EIA Report chapters 1, 2, 3, 6, 7, 8, 11 and 13.

12.2.4 Based on the baseline characterisation, the following receptors have been scoped out of the subsequent assessment. Survey of plants including fungi, lichens and bryophytes, which are considered within Chapter 6. Forest landscape is covered by Chapter 5.

12.3 Legislation, Policy and Guidelines

12.3.1 This chapter has been informed by consultation responses summarised in Table 1, information provided by the landowners' forestry agent and the following guidelines/policies:

Legislation

12.3.2 Relevant legislation and guidance documents have been reviewed and taken into account as part of this forestry assessment. Of particular relevance are:

- Forestry Commission Scotland (2019) Scottish Government's policy on Control of Woodland Removal: Implementation Guidance (CoWRP);
- Forestry Commission Scotland (2009) The Scottish Government's Policy on Control of Woodland Removal, Edinburgh; and
- Forestry Commission (2023) The UK Forestry Standard: The Government's Approach to Sustainable Forestry, 5th Edition, Forestry Commission, Edinburgh.

Planning Policy

12.3.3 Planning policies relevant to this chapter are detailed within the Planning Statement. This Chapter refers to the following policies:

- The Scottish Government (2019) Scotland's Forestry Strategy 2019-2029;
- The Scottish Government (2020) Scotland's Forestry Strategy Implementation Plan 2020-2022;
- Forestry and Land Management (Scotland) Act 2018;

- The Scottish Government (2021) Scottish Land Use Strategy;
- The Scottish Government (2023) Scotland's Fourth National Planning Framework (NPF4); and
- Argyll and Bute Woodland and Forestry Strategy 2011.

Guidance

12.3.4 Recognisance has been taken of the following best practice guidelines/guidance etc:

- Forestry Commission (2023) The UK Forestry Standard Practice Guides;
- Forestry Commission (2015) Deciding future management options for afforested deep peatland;
- SEPA (2017) SEPA Guidance Notes WST-G-027 Management of Forestry Waste;
- SEPA (2014) LUPS-GU27 Use of Trees Cleared to Facilitate Development of Afforested Land; and
- UKWAS (2017) The UK Woodland Assurance Standard, Fourth Edition, UKWAS.

12.4 Consultation

12.4.1 Details of who has been consulted and what information has been provided.

Table 12.1 – Consultation

Consultee and Date	Consultation Response	Applicant Response
SEPA 12 March 2024	If forestry is present on the site, we prefer a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with *Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS*.	– Forestry is present. – Felling and replanting are described in sections 12.9 and 12.10, and **Figure 12.3** illustrates the felling boundaries – No large scale felling is required for this Proposed Development.
NatureScot 29 March 2024	The overhead line (OHL) upgrade that is going to be implemented will result in the clear felling of large swathes of woodland in the area. Alongside this there are large sections of diseased larch in the area with action imminent to clear fell large swathes of woodland. These two landscape changes will have cumulative impacts but will also open views to the proposal that are not currently available. We would advise liaison with Scottish and Southern Electricity Network (SSEN) and Scottish Forestry (SF) to provide information of these changes to be reflected and included in the assessment.	– Information on the felling required for the OHL was not available at the time of drafting of the EIA Report. The Applicant is happy to have discussions with SSEN and SF when information is available. – Refer to LVIA Chapter 5.

12.5 Assessment Methodology and Significance Criteria

12.5.1 Forestry planning and operations within the United Kingdom are required to follow the UK Forestry Standards (UKFS).

12.5.2 Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation. They were established as an Executive Agency of the Scottish Government on 1 April 2019, following full devolution of forestry to the Scottish Parliament as a result of the Forestry and Land Management (Scotland) Act 2018 ('the Act'). The Act provides the legal basis for the regulation of forestry in Scotland and includes the requirement to be in possession of a Felling Permission to fell trees.

12.5.3 The Forestry (Exemptions) (Scotland) Regulations 2019 and The Felling (Scotland) Regulations 2019 include further detailed provisions about the operations of Felling Permission procedures. Included in these exceptions is where the felling is immediately required for the purposes of carrying out development granted by planning permission.

12.5.4 The Scottish Government's Policy on Control of Woodland Removal (2009) (CoWRP) defines woodland removal as the permanent removal of woodland for the conversion to another type of land use. This policy is supported by Scottish Government's policy on control of woodland removal: implementation guidance (2019).

12.5.5 The technical scope of the assessment has identified potential impacts and effects of the Proposed Development on the following likely sensitive forestry receptors during construction and operation:

- Coniferous plantation and broadleaved woodland;
- Ancient Woodland Inventory (AWI); and
- Native Woodland Survey Scotland (NWSS)

12.5.6 The likely environmental effects identified on the above receptors (coniferous and broadleaved woodlands which are also recorded within AWI and NWSS respectively), are included in the following:

- Loss of woodland / feature to facilitate the construction of the Proposed Development; and
- Permanent loss of woodland associated with the completed development stage of the Proposed Development.

12.5.7 The assessment also considered the requirement for replanting in situ and/ or for compensatory planting off-site.

12.5.8 This assessment does not include the socio-economic effects, and forest management resources, due to the areas of woodland to be lost being small in the broad forestry context.

12.5.9 There is no standard approach to the sensitivity of forestry. However, guidance has been taken from the CoWRP which states that there is a strong presumption against removing ancient semi-natural woodlands and woodlands listed as Plantations on Ancient Woodland Sites (PAWS), and NPF4 Policy 6, which states that development proposals should not be supported where they would result in any loss of ancient woodlands, ancient or veteran trees, or adverse impacts on their ecological condition or adverse impacts on native woodlands.

12.5.10 CoWRP implementation guidance states that "the removal of large areas of woodland will not be supported and all felling proposals must be compliant with the UKFS". UKFS guidance is such that felling is appropriate to the forest design and the forest landscape. As such the small-scale area of felling considered within this chapter does not contradict any UKFS guidance.

12.5.11 A differentiation between ancient semi-natural origin woodland antiquities is following NatureScot's guidance on understanding the Scottish AWI, where in Scotland, Ancient Woodland is defined as land that is currently wooded and has been continually wooded, at least since 1750 as outlined in Chapter 6.

12.5.12 Professional judgement has been applied, taking a precautionary approach.

12.5.13 The sensitivity of receptors has been classified as low, medium or high, in accordance with the criteria set out in **Table 12.2.**

Table 12.2 Receptor Sensitivity Criteria

Sensitivity	Criteria
Low	Woodlands not listed within AWI
Medium	Ancient semi-natural origin woodland ASNO1860 (2a and 2b)
High	Ancient semi-natural origin woodland (ASNO1750) (1a)

12.5.14 The guidance on magnitude has been defined by the CoWRP which states large scale felling will not be supported.

12.5.15 The minimum recorded woodland is 0.01 ha within the National Forest Inventory (NFI).

12.5.16 The magnitude of impact has been classified as low, medium or high, in accordance with the criteria set out in **Table 12.3**.

Table 12.3 Impact Magnitude Criteria

Magnitude of Impact	Criteria
Low	Native woodland between 0.01 and 0.5 ha
Medium	Felling scale which is UKFS compliant
High	Removal of large areas of woodland

12.5.17 Impacts have been assessed on the basis of the value / sensitivity of receptors against the magnitude of impact to determine the scale of effect as shown in **Table 12.4**.

Table 12.4 Significance Matrix (Significant Effects in Bold)

Sensitivity of Receptor	Magnitude of Change (Impact)		
	Low	Medium	High
Low	Negligible	Minor	Minor
Medium	Minor	**Moderate**	**Moderate**

High	Minor	**Major**	**Major**

12.5.18 Based on professional judgement, moderate and major effects are considered significant in EIA terms.

Study Area

12.5.19 The Site extends to both forested areas and land outside the forested areas. The impacts on forestry of the Proposed Development are limited to the forestry compartments within the Site.

12.5.20 The forestry study area includes the access through the forest areas included in the Sandbank Long Term Forest Plan (LTFP) and parts of the adjacent Auchamore Forest, which includes two turbine locations. **Figure 12.1** identifies the forest locations.

Desk Study

12.5.21 The Sandbank LTFP covers an area of 1012.4 ha. The LTFP area is made up of four commercial woodland properties; Ardnadam, Dalinlongart, Dunloskin and Glenkin. These forests are all under the same ownership and share mutual boundaries. According to the Scottish Forestry (SF) Web Viewer the LTFP was approved by Scottish Forestry Perth and Argyll Conservancy in December 2016 with an end date of December 2026. Access to the Proposed Development is taken through these forests and makes use of some of the existing forest tracks.

12.5.22 Auchamore Forest is a separate private forest under a separate ownership. Two turbines lie within the upper margin of this forest. The Web Viewer shows that no LTFP approved by SF is present for Auchamore Forest.

12.5.23 The forest data sets and associated sources can be summarised as follows:

- National Forest Inventory (NFI) 2021;
- Ancient Woodland Inventory (AWI) (Scotland) 2024;
- Native Woodland Survey of Scotland (NWSS) 2024; and
- Forest compartment data provided by the forest manager.

Site Visit

12.5.24 A forest walkover survey was carried out on 20th May 2025 to record the current woodland condition and how this related to the woodland designations attached to the Site. The survey included noting the tree species and woodland type against the forest compartment information, NFI conifer and broadleaved woodlands, AWI ancient (of semi natural origin) ASNO1750 and NWSS Plantations on Ancient Woodland Sites (PAWS).

12.5.25 The site visit also noted the age and height of the commercial crops with the purpose of assessing windblow.

Assessment of Potential Effect Significance

Methodology

12.5.26 The assessment was completed following CoWRP implementation guidance and applied only on the effects scoped in, based on the Scoping Report. The chapter considers effects on sensitive forestry features including:

- Coniferous plantation and broadleaved woodland;
- AWI (ancient (of semi-natural origin) ASNO1740 antiquity 1a and ASNO1860 antiquity 2a, other on Roy Maps antiquity 3; and
- NWSS PAWS, wet woodland and upland birchwood.

12.5.27 The sensitive forestry features identified within the field survey and desk study have been assigned a sensitivity rating using the guidance taken from CoWRP and NPF4 Policy 6 where the sensitivity of ancient woodlands is emphasised. The assessment has determined the magnitude of impact from the area of woodland required to be removed for the Proposed Development. The area to be felled was determined by the design construction requirements and reduced as far as practicable.

12.5.28 Mitigation and/or compensation will be proposed for all effects considered significant under the EIA Regulations. Residual effects are characterised as either Adverse (negative) or Beneficial (positive) and either **significant** or **not significant**, taking account of mitigation and/ or compensation proposals.

12.5.29 The assessment estimated the volume (in cubic metres (m^3)) of the timber harvested during the felling operations. The basic measurement methods follow Forestry Commission Booklet 49, Timber Measurement A Field Guide and the more detailed Forestry Commission Booklet 39 Forest Mensuration Handbook.

12.5.30 The receptors identified as sensitive to the Proposed Development, and which have been 'scoped-in' to the assessment are summarised in **Table 12.5.**

Table 12.5 Summary of Sensitive Receptors

Recptor(s)	Sensitivity
AWI Aniquity 1a Ancient (of semi-natural origin)	Medium
AWI Aniquity 2a Ancient (of semi-natural origin)	Medium
NWSS PAWS	Medium

Requirements for Mitigation

12.5.31 The Scottish Government's Control of Woodland Removal Policy (CoWRP) and other relevant guidance state that minimal woodland removal should be undertaken to facilitate new development. The CoWRP advises that the Proposed Development falls into the category of woodland removal with a need for compensatory planting.

12.5.32 Compensatory planting (CP) is calculated in accordance with Annex 5 of the Scottish Government's Policy on Control of Woodland Removal: implementation guidance February 2019.

12.5.33 Mitigation and / or compensation will be proposed for all effects considered significant under the EIA Regulations. Residual effects are characterised as either Adverse (negative) or Beneficial (positive) and either significant or not significant, taking account of mitigation and/ or compensation proposals.

Assessment of Residual Effect Significance

12.5.34 The assessment of residual effect is based against meeting the CoWRP implementation guidance.

Cumulative Assessment

12.5.35 Conifer plantations are based on rotational felling and replanting with review and restructuring to UKFS. In so doing there is no cumulative assessment for forestry.

Limitations to Assessment

12.5.36 The assessment has relied on the aforementioned open data. There are some minor digital spatial differences noted between NFI, AWI, Ordnance Survey backdrop used and web-based aerial imagery. The information provided by the forest manager is detailed for the Sandbank Forest but limited to the sub compartment data within the Site for Auchamore Forest. No assurance can be provided for third party data.

12.5.37 The digital geographic information provided by the forest manager is limited to within the Site and does not cover the full woodland area. As this assessment mainly covers the access for the Proposed Development this is a limited constraint on presentation.

12.6 Baseline Conditions

12.6.1 The forests described within the Sandbank LTFP, reference 15FGS03674, were planted between 1974 and 1981. Some retained trees were planted in the 1930s.

12.6.2 The main species is Sitka spruce (*Picea sitchensis*), with Scots pine (*Pinus sylvestris*), Norway spruce (Picea abies), lodgepole pine (*Pinus contorta*) and larch species (*Larix spp*). Other conifer species such as Douglas fir (*Pseudotsuga menziesii*), silver fir (*Abies alba*), western hemlock (*Tsuga heterophylla*) and western red cedar (*Thuja plicata*) are also present in smaller numbers. There are significant areas of broadleaved trees within the forest mainly located along the Glenkin Burn and the lower eastern slopes of the forest. A variety of broadleaf species are present in these areas and include birch (*Betula spp.*), oak (*Quercus spp.*), alder (*Alnus spp.*), willow (*Salix spp.*) and hazel (*Corylus avellana*).

12.6.3 There are 109.1 ha of ancient woodland sites present within Sandbank LTFP. Approximately 60 ha of these ancient woodland sites are currently classified as PAWS (refer to **Appendix 12.1** - **Plates 1 and 2**).

12.6.4 Auchamore Forest is a productive coniferous forest, the principal species being Sitka spruce planted in the 1970s with restocking following felling. The forest area includes NWSS upland birchwood outwith the Site.

12.6.5 Within the Site the sole species is Sitka spruce, with some retained poor growth and quality tree crop planted in 1971 and 1972 at the upper forest edge. Where the better crop has been felled this was replanted in 2020.

12.6.6 SF Web Viewer records no Forest Plans however Felling Licence Applications (FPA) reference 033/115/06-07 approved in April 2007 and reference 033/58/10-11 approved in July 2010 are shown.

12.6.7 **Figure 12.2** illustrates the baseline species within both forests.

Future Baseline

12.6.8 The Future Baseline for Sandbank Forest is in line with the current LTFP with minor changes in access tracks and the species change from productive conifer to native broadleaved within the felled and replanted area of AWI.

12.6.9 Auchamore Forest has a slight reduction in productive conifer resulting from the construction and operation of two turbines and a change from low quality conifer to restoring peatland. Otherwise, this forest would continue to be managed as rotational productive conifer plantation.

12.7 Embedded Mitigation

12.7.1 The principal mitigation would be compliance with CoWRP, Implementation Guidance in providing CP for the areas of woodland permanently removed for the Proposed Development. This CP would be undertaken on appropriate sites anywhere in Scotland that can deliver the equivalent woodland-related net public benefits to the woodland removed. Further embedded mitigation includes:

- All forestry works, felling and replanting, to be carried out in accordance with the relative UKFS guidelines; and
- Inclusion and implementation of the forestry operations as detailed in the CEMP.

12.8 Receptors Brought Forward for Assessment

12.8.1 Given that ancient semi-natural woodland is considered to be an irreplaceable resource and that parts of the woodland within the Site have ancient semi-natural characteristics, they should be afforded additional protection. However, for the most part the woodland will be managed as rotational forestry, to be clear felled and replanted over time. Surrounding forestry receptors would be of low sensitivity being similarly managed woodland.

AWI antiquity 1a/2a and PAWS (coniferous plantation)

12.8.2 The timber harvesting activity is of a very small scale (1.82 ha) (**medium** sensitivity), the magnitude of impact would therefore be medium.

12.8.3 Accordingly, construction timber harvesting on the AWI antiquity 1a/2a and PAWS receptor would be temporary **moderate adverse.** The effects would be short-term and therefore **significant**.

12.9 Potential Effects

12.9.1 The main infrastructure of the Proposed Development is outwith the forested areas however the requirements for the main access and two turbines will have an effect on the current forest structure.

Construction

12.9.2 The Proposed Development tree felling is shown in **Figure 12.3**. Tree felling is required for new access tracks, upgrading of existing forest tracks within Sandbank Forest (refer to **Appendix 12.1 - Plates 3, 4 and 5**).

12.9.3 Felling is also required for the two turbines within Auchamore Forest with the associated environmental bat stand-off from trees and the removal of poorly performing trees on peat for peatland restoration (refer to **Appendix 12.1 - Plates 6 and 7**).

12.9.4 Felling for the Proposed Development is categorised as either permanent (which is woodland lost for the permanent infrastructure and environmental buffers), temporary (which will be replanted in situ post construction), or Biodiversity Enhancement Strategy (BES) felling for peatland restoration in **Appendix 6.5**. The felling of poorly performing conifer woodland for peatland restoration is based on the guidance provided by the Forestry Commission Practice Guide '*Deciding future management options for afforested deep peatland'.*

12.9.5 The total areas to be felled are shown in **Table 12.5.** The total area of productive timber harvesting is 32.94 ha delivering an estimated 5,864 tonnes of roundwood to the wood processing industry. Given the age of the standing timber, it is assumed that more than 75% of the area would produce material which would meet market specifications including the biomass market. The remaining area contains small, recently planted trees, which can be left on-site to recycle nutrients to the forested areas.

Table 12.5 Felling for the Proposed Development

Type of Felling	**Area (ha)**
Permanent Felling	3.85
Temporary Felling	7.39
BES Felling for Peatland Restoration	21.68
Total area of Felling	**32.94 ha**

12.9.6 Part of the felling for new and upgraded tracks, listed above, is in areas listed as PAWS and as ancient semi-natural woodlands antiquity 1a and 2a with an area of antiquity 3. The plantation trees within this area all either first or second rotation non-native conifer. The species and age of these areas are shown in **Table 12.6.**

Table 12.6 Felling within AWI and PAWS (Coniferous Plantation)

Antiquity	Species	Planting Year	Area (ha)
1a (part 2a)	Sitka spruce	1979	0.60
1a	Sitka spruce and Norway spruce	2012	0.15
1a	Mixed conifer	1930	0.36
1a	Mixed conifer	2009	0.43
3	Mixed conifer	2009	0.28
Total Area Felling within AWI and PAWS			**1.82 ha**

12.9.7 As part of the Proposed Development, the area of woodland lost would be replanted off-site in accordance with the implementation guidance to CoWRP. The new woodland would be to at least the area of woodland lost resultant from the Proposed Development. The new woodland would meet the requirements of UKFS.

12.9.8 The Applicant is committed to providing suitable compensatory planting. The compensatory planting arrangements would be agreed with Scottish Forestry prior to commencement of the construction stage. **Table 12.7** outlines the approach to compensatory planting.

Table 12.7 Approach to Compensatory Planting

Type of Woodland Loss	Area (ha)	Compensatory Planting Ratio
AWI Woodland Loss	1.08	1:10
Non Designated Woodland Loss	2.77	1:1
BES Felling for Peatland Restoration	21.68	Not required as "forest to bog conversion"
Total area of Felling	**25.53**	

12.9.9 While the trees within the AWI areas are not themselves of any antiquity value, it is recognised that the soils which would be disturbed during construction are considered to be of ancient woodland merit and therefore an enhanced ratio of compensatory planting is provided.

12.9.10 The total area of compensatory planting off-site is therefore 13.57 ha.

Operation

12.9.11 No further felling would be undertaken during the Operational Phase. Replanting of the temporary felled areas would be carried out with subsequent maintenance as required until considered fully established at approximately year 7 after planting.

Decommissioning

12.9.12 No forestry activities would be required as a result of decommissioning.

12.10 Additional Mitigation

12.10.1 Enhancement of the AWI temporary felled areas is proposed with 0.74 ha restocking with native broadleaved trees rather than non-native conifers present on-site. The remaining temporary felling would be with productive conifers as proposed in the forest owners' LTFP. The replanting is shown on **Figure 12.4.**

12.11 Residual Effects

Construction

12.11.1 Felling of woodland has been minimised as far as possible through the design of the Proposed Development, however as felling of AWI antiquity 1a/2a and PAWS woodland is required the construction phase effects would be **Major, adverse and significant.**

Operation

12.11.2 With proposed replanting on-site (see 12.9.11), enhanced compensatory planting off-site (see 12.9.7) and restoring peatland the residual operational effects are **not significant.**

Decommissioning

12.11.3 There would be no residual effects to forestry on decommissioning.

12.12 Cumulative Assessment

12.12.1 Since plantation forests and woodlands are typically rotational, a cycle of felling and replanting would occur, as governed through the Forestry and Land Management (Scotland) Act 2018 and the Scottish Government's Policy on Control of Woodland Removal. Therefore, there is no net loss of woodland and as such cumulative effects have not been considered in this assessment.

12.12.2 Similarly, third party developments are governed through the same Forestry policies and legislation and where required compensatory planting would be provided and in the Scottish Context there is no net loss of woodland area.

12.12.3 Compensatory planting requires an area at least equal to the woodland loss and at least equal in net public benefits. Therefore, the quality as well as quantity of woodland is being compensated for in the replacement woodlands.

12.13 Summary

12.13.1 The forests within the Site consist of two separate ownerships and management arrangements.

12.13.2 Permanent felling of 3.85 ha is required for the construction and operation of the Proposed Development. A further 21.68 ha would be felled to restore peatland as part of the BES proposals.

12.13.3 Within the permanent woodland, loss of 1.08 ha is within AWI (coniferous plantation). The calculated area to be taken forward for compensatory planting complies with the Scottish Government's Control of Woodland Removal Policy which includes a 10:1 multiplier for the disturbance to soils for the woodland loss within the AWI.

12.13.4 The Applicant is committed to providing 13.57 ha of appropriate compensatory planting and is seeking locations both within and outwith the Site. The planting design will meet the requirements of UKFS guidance, and a detailed Planting Plan will be provided for approval by Scottish Forestry.

12.13.5 A further 7.39 ha is felled as good forest management practice in anticipation of windblow which will be considered as temporary felling and replanted in situ. Replanting within AWI would be with native broadleaved trees as enhancement.

12.14 References

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