

Perth & Argyll Conservancy

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Conservator
Cameron Maxwell

By email

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Dear Stuart

Acha-Bheinn WC - Forestry (EIA) (Scotland) Regulations 2017

We refer to your application for our screening opinion as to whether the forestry project you have proposed at Acha-Bheinn, by Barmolloch, Argyll is an EIA forestry project (is likely to have significant effects on the environment by virtue of factors such as its nature, size or location) and therefore requires our consent under regulations 3 and 7.

In making this screening determination under regulation 11, we have taken into account the relevant selection criteria set out in schedule 2 of the regulations, available results of any relevant assessment of the effects of the forestry project proposed and the information you have provided under regulation 12 (request for a screening opinion).

We can confirm that the work you propose is an EIA forestry project and requires our consent. In Annex 1 of this letter, we have set out the statement of reasons for our decision under regulation 11(3). This determination will be made publicly available.

Please contact us if you wish to take this project to the scoping stage.

Yours sincerely



Cameron Maxwell
Conservator

Statement of reasons

In this case the relevant criteria in schedule 2 are:

- Size and design of the forestry project
- Cumulation with other existing forestry projects
- The sensitivity of the area with regard to biodiversity.

Although the potential for cumulative impact is recognised in the EIA determination request, no real attempt has been made to consider the cumulative impact of the loss of open ground habitat and species by the preceding three Barmolloch schemes and the current proposal.

There is no explanation as to how the Acha-Bheinn proposal has been designed to complement or fit with Barmolloch 1, 2 and 3.

From the ornithological report, the site seems to be important for black grouse with four blackcock seen leking in the spring. The operational plan seems to contradict this and no mitigation is suggested for the lek on the site (the lek was not identified on the maps) or for general black grouse use of the proposal area.

The ornithological report concludes that the scheme may result in neutral impact to black grouse but notes an element of uncertainty that the current number of cocks could be supported long term. This raises a question which doesn't seem to have been answered in the scheme design. There is no consideration of the effects of fences in the plan.

Open habitat management is necessary to maintain the low / grazed type sward black grouse need to maintain a presence in the landscape. Bird movement, and activity at leks, is traditionally highly mobile across these types of landscape and some displacement would seem highly likely. The SNH Species Action Framework advocates moorland management, new native woodland creation and predator control as key prescriptions for black grouse management. These three actions could be considered as potential mitigation.

The cumulative impact of the current and preceding three woodland creation schemes on black grouse has not been considered. There is reference to the importance of black grouse in the documentation for the previous three schemes and a reference to a commitment by Scottish Woodlands to monitor the populations.

The ornithological report flags up significant concerns over the loss of red listed scrub/moorland songbirds and identifies a cumulative impact caused by the current proposal, other current proposals and the previous Barmolloch schemes. Although our internal advice suggests that the red listed songbirds identified are not in decline in Argyll, it is concerning that the issue identified in the report has not been addressed by the proposal.

The impacts on black grouse, on a site and cumulative impact basis, have not been adequately addressed or mitigated in the proposal and are likely to have significant effects on the environment.

Separately, there are a number of aspects of the proposal which would have to be addressed in order to meet the UK Forestry Standard:

- The design of any woodland in and around the higher, craggier areas within the proposal area likely to be of use to golden eagle should follow good practice on golden eagles and forestry.

- A significant area (9 hectares) of new native woodland placed at the highest part of the scheme could (at least in part) have been used to strengthen habitat networks within the forest.
- It will be important to check site suitability for the establishment of native woodland at the highest parts of the scheme.
- It's not clear how the 18 hectares of potential ground water dependant habitats (GWDTE), the marshy grassland identified in the vegetation survey, have been considered in light of the recent guidance on GWDTEs.
- There has been some attempt at creating habitat networks on the site but this is limited and more should be done to enhance and buffer the existing native woodlands and remnant mature trees and to connect to open space provided by the deep peat and high number of archaeological features.
- The ornithological report mentions calcareous grasslands and it would be useful to note how these are being mitigated and to cross-reference these with the vegetation survey.
- The operational plan does not identify how the habitats identified as being of conservation importance in the habitat survey will be mitigated.
- We would want to take a look at the area (7.5 hectares) of shallow and occasionally deep peat to confirm that it is appropriate for planting.