

Feedback Log

Issues in bold with a * against them, are one of the top 5 issues raised.

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Population and Human Health

1. Likes the proposed walking routes and that the current routes will be maintained.

We appreciate that some respondents like that the old paths will be maintained and the routes that are being proposed.

2. <u>Retention of current paths to the summit</u>

Current path routes will be maintained alongside proposed new rides and will provide more varied routes to the summit of Warb Law.

3. <u>Will the paths be maintained?</u>

Following operations, all rides/roads within the scheme area will be reinstated to their previous condition, where required. Furthermore, all rides will be maintained twice annually via strimming of vegetation.

At year 10, if the grant is still available, there is the potential to apply for the Woodlands In and Around Town (WIAT) grant. This will allow further upgrades to the rides to be made if necessary, and the allocation of benches.

4. Loss of Waymarked Walks, particularly 4 of the 14 Langholm Walks

Route 4 of the Langholm Walks – Potholm & Castle Hill sits to the north of Langholm and has been included in the map showing the wider current and proposed access provision. There is no impact on access to this route however the proposed woodland creation at Warblaw will be visible from the walking route. The views will be similar to those from Whita Hill where photomontages showing the site now, the woodland at 5 years old and 25 years old have been produced.

5. <u>Limited access for the public to the hill, with all walks through 'barren' Sitka spruce</u> <u>forest.</u>

In line with the Scottish outdoor access code (Land Reform (Scotland) Act 2003), members of the public have 'reasonable access throughout the area' (Scottish Outdoor Access Code, 2005). To help facilitate this a system of paths are being proposed as part of the application. This will amount to at least 10 new paths providing various circular routes suitable for walkers, bikers and horse riders. The proposed paths will be open, grass rides between crop boundaries and will not be surfaced. Where the proposed path cuts over wet ground we may lay short sections of type 1 substrate and improve drainage.

This is in line with the responsibilities outlined for land managers in the Scottish Access Code, as it demonstrates that:

- Access rights have been taken into account when planning any major land use change.
- Paths and tracks are being used so that access is integrated with land management.
- Respecting rights of way or customary access across the land.



(Scottish Outdoor access code, 2005)

Furthermore, whilst the public will be able to walk through the Sitka spruce, the proposed paths are located within areas of native broadleaves (which will include species such as wild cherry, goat willow, silver birch and juniper), Scots pine, Norway spruce, Douglas fir and open ground.

For information relating to the biodiversity potential of the woodland, please consult points 25 & 26.

6. <u>Meet with interested local groups to discuss access routes.</u>

Following receiving feedback from Scottish Forestry as to what is written here, and once updates to the proposed woodland design have been finalised, it is our intention to meet with local groups, such as Save Warblaw Action Group (SWAG) and the Langholm Alliance to discuss the design changes.

The routes as outlined at the consultation obtained were through looking at the local Langholm Walking groups site which has 14 walks, walking the site and identifying desired routes, and meeting with a local representative of a local jogging group who pointed out the routes with the highest usage.

7. <u>Mountain bike trails</u>

Whilst no signage will be erected to specify mountain bike trails exclusively, both the proposed rides and the current ones will be able to be used by mountain bikers, alongside walkers and horse riders. Furthermore, under the Scottish Outdoor Access code, we cannot limit access to one group of people (Scottish Outdoor Access Code, 2005).

8. <u>Lack of proper engagement with the community.</u>

Altogether, four consultation events have been held. In 2023, two events were organised, one in Canonbie and one in Langholm on the 3rd and 4th of May where we consulted on our concept map showing the management zones for the site. In 2024 a further two events were held in Langholm on the 5th and 20th of August. Across all four events members of the local community, the local council and statutory bodies were invited to provide feedback. The Langholm Initiative attend the drop-in sessions as did The Langholm Alliance. A meeting was held with a representative of the Muckle Toon Joggers however following pressure from the local community they have not engaged further.

9. <u>Further consultation with the local community to make the proposal mutually</u> <u>beneficial.</u>

It is stated in UKFS 5 that an 'appropriate' balance between social, environmental and economic objectives is to be achieved (UKFS5, p13, 2023). The objectives of this woodland creation are aiming to achieve the correct proportions of the above aspirations by aiming to:

- Create sustainable timber production
- Protect and enhance biodiversity within the boundary of the site
- Protect cultural heritage remains



- Facilitate public access
- Create an attractive and diverse woodland
- Safeguard water quality and soils
- Carbon Sequestration

Furthermore, because of the consultations held with the community, revisions to the woodland design are in development, such as redesigning the area around the cemetery and the sale of land around Middleholm. The revised design will be sent to consultees with a summary of the changes made.

For further information, please see point 6 and 8.

10. Proximity of Woodland Creation to Langholm

The proximity of woodland creation schemes to settlements is not unusual. Woods In and Around Towns (WIAT) is a Scottish Forestry scheme which aims to support the creation of woodlands within 1km of settlements with a population of over 2,000 people. This framework argues that such woodlands can help to provide good and accessible woodlands close to where people live and work. It is our intention to apply for this scheme if the woodland is approved/ if the grant is still available, and once it is 10 years old, as it will allow for public access to be improved/upgraded.

11. What are the benefits to the local community?

It is foreseen that benefits to the local community include:

- The creation of designated path routes within the woodland will facilitate access for all. These paths, and ones currently in use, will be maintained and open for use to walkers, mountain bikers and horse riders.
- A notable number of forestry contractors live within the Langholm area, and they will be invited to tender for forestry works, bringing employment to Langholm.
- Large tracts of deep peat excluded from the proposal area that will be retained in agriculture with exploration of the potential for peatland restoration, including the removal of non-native regeneration.
- Areas of land identified as being of good agricultural grade have been retained, sales of agricultural parcels to interested parties will be considered if a woodland creation grant contract is issued.
- Protection and enhancing of the existing ancient semi natural woodland fragments on Warblaw, currently overgrazed and not regenerating.
- Woods and trees are good for our health and wellbeing, both physical, social and mental. According to a report from the Forestry Commission as far back as 2009, this can include:
 - Daily contact with living things larger than ourselves provides us with a sense of proportion and scale.
 - Woodlands can help moderate the effects of stress and mental fatigue.
 - For children, woodlands offer rich opportunities for play, which are more challenging and diverse than other types of greenspaces.
 - Children engaged in woodland settings are more likely to interact and socialise as part of a group.

(Forestry commission, p10, 2009)



12. Loss of rural employment.

Within Dumfries and Galloway, forestry is a major employer, with around 3000 jobs across all sectors, with the area producing around 30% of Scotland's annual timber revenue (Dumfries and Galloway Council, 2014). It can therefore be argued that this scheme's economic objectives are supporting not only Scotland's climate change agenda, but also the economic opportunities with D&G. For further

For further information on employment, please go to point 15.

13. Likes the Improved Employment Facilitation.

Thank you, we appreciate your comment.

14. The people who invest in these projects have no idea where Langholm is.

The company that has bought the land are James Jones and Sons Ltd, they own three sawmills located in Lockerbie, Dumfries which employ over 150 personnel.

15. How many jobs will it provide?

Part time employment opportunities will very across the lifecycle of the forest. The below figures are estimates based upon previous, similar projects.

• During the establishment phase:

The upgrading/maintenance of roads and the cultivation of the ground for planting – 5 job opportunities.

Planting – 20 job opportunities

• During the maintenance phase:

Maintenance – 20 jobs

• Harvesting phase:

Harvester and forwarder – at least 2 job opportunities (Often these positions cycle through different employees within the harvesting company, thus there is the potential that further employees will benefit from these job).

Timber Hauliers – at least 2 job opportunities.

Following harvesting the site will be replanted, beginning the lifecycle (rotation) of the forest again and presenting the above job opportunities to a new market.

Furthermore, it should be noted that the above only addresses the work on the ground. It does not address the managerial employment (5 job opportunities), and the various opportunities present in the mills and tree nurseries and the further wider employment opportunities for those who sell and utilise the wood products generated from the growing of commercial softwoods.

16. The scheme will negatively impact upon our mental, physical and social health.



Please see point 11.

17. Misrepresentation of previous consultation comments.

The consultation which took place in May 2023 was based on a draft zoning of woodland/management types (concepts) and did not give specific detail on species types, access and further constraints. Feedback from these consultations were incorporated into the design which was presented at the August 2024 consultation events.

18. Huge impact on the views from our house.

We understand your concern regarding such a change; however, what is being proposed is a change of one type of rural landscape to another. This view was expressed in the Landscape appraisal where it is stated that:

"The majority of effects on landscape character would be neutral in nature – adding more woodland cover to an already well-wooded landscape, but not causing notable detrimental change in the overall make-up or character of the landscape or of views."

19. Summit used to mark special occasions

No planting is planned for the summit of the hill and members of the public will still be able to access the summit to celebrate special occasions on foot. Vehicular access would be permitted on request for special occasions.

20. Paths to be little more than left over ATV tracks

Some of the open grass rides will be used as ATV tracks to help with the laying out of trees to be planted. However, following planting the rides will be reinstated to allow for public use where required.

Please see point 3 for further information.

21. Design of the paths, will they avoid steep inclines and have proper drainage?

The rides will be a mix of gentle and steep inclines, providing choice to users. Furthermore, the rides are not just for walkers, but horse riders and cyclists/mountain bikers, therefore a variety of rides is essential.

Rides will have adjacent drains where practical and necessary to do so. Maintenance will aim to ensure rides remains in a reasonable condition for users and don't disappear under a blanket of bracken and other tall weeds.

22. What budget has been allocated to paths?

As we are still at the planning stage, no budget has currently been written up. However, the topping of or strimming of the rides will be tendered within the Langholm catchment once the woodland establishment works have been completed



23. <u>Post use of ATV tracks, how will they remain safe for use if used for future forestry</u> <u>operations, such as chemical spraying.</u>

If rides are used for maintenance operations, such as chemical spraying, this type of operation is mostly carried out on foot.

For operations such as beat-up planting, most of this operation is carried out on foot with at most 2 ATV's helping the dropping off, of tree bundles. From experience of other woodlands where paths have dual use, this has minimal impact.

If rides are required to be used by ATV this would be kept to a minimum and if necessary, repairs would be carried out. Therefore, no impact to the rides is foreseen.

Please see point 3 and 20 for further information.

24. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact the Community Council</u> and as the application progresses, inform the council of changes and incorporate feedback into the design.

The community councils of Langholm, Ewes, Westerkirk, and Canonbie, were contacted by email as part of the 2023 and 2024 consultation events. The councils were contacted on the 5/7/24 inviting them to the 2024 consultation events and following the events on the 26/8/24, sharing access to the online documents of the events and requesting feedback. We have received no response from the community councils in relation to the 2024 consultations.

25. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact any local groups or other interested parties providing details of the application. Inform of changes and collate feedback.</u>

A number of local groups have been contacted as part of the application process; this includes:

- Save Warblaw Action Group (SWAG)
- Langholm Alliance
- Langholm Initiative
- Muckle Toon Joggers

Communications with the above groups have taken a variety of forms, from feedback forms, to in person to email conversations. Feedback from these groups have been included in this document. In particular, communications with SWAG remain ongoing past the official feedback deadline of the 17th of September 2024.

Once we have produced a final design, and the application documents are complete, we will share these documents with the above groups (excluding the Muckle Toon Joggers as they have requested to not be included further in the consultation). We will also arrange an in person meeting to discuss the design of the woodland with the groups highlighted above and the community councils.



26. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Contact all neighbouring properties and landholdings, providing details of application. Inform of changes and collate feedback.

For the 2023 consultation event, properties neighbouring the scheme area were hand delivered consultation information including a letter inviting them to the consultation, a location map and a concept map of the planting area. Posters were also put up around Langholm to inform the local of the events, this included the library and the local shop as well as being shared with the local council.

For the 2024 consultation, posters were again put up around Langholm as well as in the local newspaper for the three weeks leading up to the first event on the 5th of August. Moreover, those who had responded to the 2023 consultation and included their email address in their feedback forms/ those who emailed in their forms were contacted directly to inform them of the upcoming events.

27. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Hold community drop-in sessions,</u> providing details of application. Collate feedback.

Altogether, 4 public consultation events have been held as part of the Warblaw Woodland Creation proposal. In 2023, two were held on the 3rd and 4th of May and in 2024 a further two were held of the 5th and 20th of August. Alongside this, consultation information was hosted on the Scottish Woodlands website for those who could not attend in person.

The feedback we received in response to these events was collated in their respective feedback logs.

Once we have produced a final design, and the application documents are complete, we will be hosting the documents on our website for the local community to view.

Biodiversity

28. <u>Dislikes the large-scale planting of monocultural Sitka spruce for commercial</u> <u>purposes. *</u>

The Warblaw woodland creation is not proposing a monoculture of Sitka spruce. In contradiction to the 52% Sitka spruce that was cited within one feedback form, only 45.27% of the planting area is to be given over to Sitka spruce, which is only 20.35% of the whole scheme area when including land being retained in agriculture. For the full break down of species biodiversity within the proposed woodland, please consult point 25.

The economic objective of the woodland is an important component in creating the appropriate balance between it and the social and environmental objectives of the site (UKFS5, p13, 2023). Investing in Scotland's timber industry can help to tackle climate change, this can be achieved by:

- \circ Supporting the use of wood fuel and renewable energy as a substitute to fossil fuels.
- Locking up carbon in growing trees (Conifers achieve the highest C02 uptake in the first 50 years. (Forest Research, 2022))
- Promoting the use of wood in place of more carbon-intensive materials, such as concrete (Scottish forestry, n.d).



Furthermore, within Dumfries and Galloway, forestry is a major employer, with around 3000 jobs across all sectors, with the area producing around 30% of Scotland's annual timber revenue (Dumfries and Galloway Council, 2014). It can therefore be argued that this scheme's economic objectives are supporting not only Scotland's climate change agenda, but also the economic opportunities with D&G.

29. <u>Sitka spruce plantations do not support a varied biodiversity. It will lead to a</u> <u>loss of wildlife/habitat. *</u>

This is a commonly held belief however conifer plantation, including Sitka spruce, can support a broad range of biodiversity across its lifespan. For instance, species within younger stands include song thrush, siskin, hen harriers and tree pipit (Calladine et al, 2018, cited in Korland, Wilkie and Gallacher, 2023).). Mature Sitka stands support goshawks, golden eagle, capercaillie, badger, red squirrel and crested tit, to name a few (Calladine et al, 2018, cited in Korland, Wilkie and Gallacher, 2023).

A case study in Doddington North Forest in 2020 found that there had been an increase in kestrel, barn owl, hen harrier, nightjar, wall butterfly and petty whin compared to the numbers surveyed before planting two years prior (Harris, 2020, cited in Korland, Wilkie and Gallacher, 2023). Both surveys were conducted by the same ecologist, thereby providing empirical evidence of the biodiversity changes found over the first few years within a new forest (Harris, 2020 cited in Korland, Wilkie and Gallacher, 2023).

Biodiversity within Sitka plantations is not limited to birds and mammals, but it also supports a range of fungi and invertebrates. A study conducted in 2014 by Irwin and her collaborators discovered that the species richness of some insect species, such as beetle and spider, within Sitka and Norway stands can be close to, or as high as, that found in semi natural woodland (Irwin et al, 2014, cited in Korland, Wilkie and Gallacher, 2023).

Furthermore, it must be taken into account that Sitka spruce plantations are not planted in isolation but are a part of a diverse woodland mosaic, incorporating native broadleaf species, other conifers and areas of open ground. Since the 1980's, forest policies have placed greater emphasis upon creating environmental benefits (UKFS, p23, 2023). This is reflected in UKFS guideline 9 under Forests and Biodiversity:

"Improve the ecological connectivity of the landscape for woodland and other species by extending and linking habitat features; consider the juxtaposition of wooded and non-wooded habitats and aim for the best overall result for biodiversity." (UKFS, P29, 2023)

The above guideline has been taken into account in this woodland proposal as the design incorporates diverse species, tracts of open ground and riparian woodland, creating corridors for wildlife.

For more information of the species diversity in the scheme, please consult point 30.

30. More species diversity within the scheme. More native species and less Sitka.

The percentage of species that can be planted within a woodland, is controlled by the UK Forestry Standard 5 (UKFS 5). Under General Forestry, Good Forestry Practice



Requirement 21, it is stated that a woodland must incorporate a minimum of the following percentages:

5 % Native Broadleaves

10% of other tree species

10% Open ground, or ground managed for biodiversity as the primary objective

And that no more than 65% of the woodland area can be planted with one single species (UKFS 5, 2023)

The woodland composition for the Warblaw woodland creation goes beyond the minimum required by UKFS 5.

The below table shows the species composition as displayed at the 2024 consultation events:

Species	Area (ha)	% of Planting Area
Area retained in Agriculture (including areas of Deep Peat)	578.63 ha	0%
Sitka Spruce	213.93 ha	45.27%
(Single Species)		
Native Broadleaves	90.82 ha	19.22%
Diverse Conifer	84.72 ha	17.93%
(Other tree species)		
Open Ground	64.94 ha	13.74%
Productive Broadleaves	18.15 ha	3.84%
(Other tree species)		

As can be seen from the above table, Sitka spruce comprises less than half of the scheme area at 45.27%, 19.73% below the 65% maximum allowed under UKFS5. Additionally, the 'other species' which is comprised of diverse conifer and productive broadleaves amounts to 21.77%, 11.77% over the minimum required in UKFS 5. This can also be seen with proposed native broadleaf areas, which will amount to 19.22% of the planted area, which will be 14.22% over the minimum requirement outlined.

Moreover, the placement of the species will enhance their contribution to the biodiversity within the area.

• Native broadleaf species will be focused in two different areas. The first is alongside watercourses to create a riparian habitat. This will help to regulate the temperature



of the water by providing shade, whilst falling leaves and insects feed the wildlife below. The second area where native species will be focused adjacent to existing remnant ancient semi natural woodland. This is in line with good practices set out within UKFS 5 which highlight the importance of enhancing and expanding semi natural habitats.

- Productive broadleaf areas balance providing valuable habitat areas alongside contributing to the economic objectives of the woodland. The location of these areas helps to expand upon the habitat corridors provided by the native woodland areas, creating diverse pathways for flora and fauna.
- Diverse conifer species not only provide landscape interest through increased diversity, but they also contribute towards enhancing forest resilience against pests and diseases and increase forestry sustainability in the face of climate change (UKFS5, 2023).
- $_{\odot}$ $\,$ Sitka Spruce, please see the response to question 25.

Finally, the below table lists the range of species being proposed as part of the Warblaw woodland creation.

Conifer Species	Productive Species	Broadleaf	Native Broadleaf Species
Sitka spruce	Oak		Wild cherry
Douglas fir	Sycamore		Downy Birch
Norway spruce	Wild Cherry		Alder
Scots pine			Oak
Western Red Cedar			Goat willow
Western Hemlock			Silver birch
Coastal Redwood			Rowan
			Aspen
			Hazel
			Hawthorn
			Juniper

The collection of species above illustrates that an abundance of species will be planted as part of the scheme. Thereby creating not only an attractive woodland but also one that has taken into account the ecological potential of the site, creating a sustainable woodland in the face of climate change.



31. More Open Space

Areas of open space within the woodland amount to 64.94 ha, 13.74% of the overall area proposed for planting. Not only is this figure 3.74% greater than that required under UKFS 5, but the placement of the open ground contributes towards protecting ecological and historical sites as well as preserving utility routes. The pockets and tracts of open ground also works in conjunction with the forested areas to provide valuable habitats and wildlife corridors. Also, when considered with the areas to be retained in agriculture, the area of open ground within the scheme increases to 643.57 ha, 61.23% of the overall scheme area. Therefore, altogether a significant proportion of the site is going to remain as open ground/ open moorland.

32. <u>Can planting of native hardwoods be a long term, sustainable and alternative crop to</u> <u>Sitka</u>?

Hardwoods are not a sustainable alternative to softwoods. Whilst soft woods are ready to harvest after roughly 35 years, hardwoods take much longer to grow and will not be ready to harvest until they are around 150 years old. Whilst they can be harvested earlier, it will reduce the products that they can be used for (Forest and Land Scotland, n.d).

33. The whole scheme should just be native woodland.

Please see point 24, 25 and 28.

34. Likes the species diversity and placement proposed.

Thank you, we appreciate your comment.

35. <u>Future land management should complement existing/ future objectives, regeneration</u> of native oak, birch and alder woodland around town.

As part of enhancing and expanding the ancient semi natural woodland already present on Warb Law, natural regeneration will be encouraged alongside the planting of native broadleaf species. The native species to be planted will be informed by the ancient woodland survey undertaken in 2024.

Natural regeneration is slow and unreliable, if we opted to expand the area of ancient semi natural woodland through natural regeneration alone there is no guarantee that the desired species or correct stocking densities required within the Forestry Grant Scheme would be achieved, resulting in a need in the future to undertake enrichment planting at cost.

36. Remnant ancient woodland should be consolidated.

It is our intention to consolidate the existing ancient semi natural woodland present on Warblaw.



In the image below, the areas hatched in purple show the existing ancient semi natural woodland and the light brown areas the proposed expansion of native broadleaves. The species choice for the native broadleaf planting will be informed by the ancient woodland survey.



Please consult point 32 for further details.

37. Bird Survey has failed to detect hen harriers.

Alongside the Breeding Bird survey, a separate Wintering Hen Harrier Survey was also conducted. No hen harriers were sighted during the survey, which spanned dates across 4 months, however the surveyor conducted background research to ascertain that hen harriers have bred within 2km of the site within the last 10 years (Wildlife Consulting, 2021). As a result of the survey and the background research, Wildlife Consulting concluded that 'The results of these surveys indicate that hen harrier use of the site is limited, and the species is not considered currently to be roosting (or breeding) on site over the course of the year.'

This is supported by data provided by RSPB which shows that limited hen harrier activity has taken place within the boundary of the site, and not since 2022.

38. Impact of the scheme upon breeding birds.

The scheme will have a balanced impacts upon the population of breeding birds within the proposed area. Within the first 6 years of planting, there will be little to no impact. After that point, birds more reliant upon an open habitat will be displaced, whilst on the other hand bird species which rely upon a wooded environment will increase. This will also fluctuate throughout the lifecycle of the forest, especially after the first rotation of the woodland where there will be a greater diversity in age structure, allowing the woodland to support a broader range of species, including those not found on open hill.



39. <u>Destruction of 'natural' landscape.</u>

Whilst it can be debated how much of the landscape surrounding Langholm was once wooded, in 'Langholm as it was: a history of Langholm and Eskdale from the earliest time' by John Hyslop and Robert Hyslop (1912) it is observed that 'Forests have given place to fields'. This emphasises that 'natural' is often subjective and relates more often to what is known, rather than what is a landscapes 'natural' state.

40. Widespread use of herbicides across the scheme area

Where chemical interventions, such as pesticides or fertilisers, are used this will be targeted to address location specific issues within the crop and will not be used imprudently across the whole site.

Forestry and Water guidelines will be followed during forestry operations. This includes:

- A minimum amount of fuels and oils will be retained on site, with no refuelling within 10mof any water courses and no handling/storying of fuels within any buffer zones.
- A 50m buffer zone will be maintained around drinking water supplies. Within this zone no pesticides or fertilisers will be sprayed or stored.
- A 20m buffer zone will be maintained around watercourses 2m or greater in width.
 Within this zone, no ground preparation will be undertaken, no fertilisers stored, and no application of inorganic fertilisers or pesticides.
- A 10m buffer will be maintained around watercourses measuring 1-2m in width. Within this zone, as above, no ground preparation, storage or application of fertilisers and no pesticides preparation, application, storage or cleaning of sprayers will be undertaken.
- A 5m buffer zone will be maintained around watercourses up to 1m in width. Within this zone, no harvesting, brash tracking or ground preparation machinery will be used. Additionally, no application of pesticides or inorganic fertilisers will be undertaken, and no pesticides will be stored or sprayers cleaned.

(Forestry and Water Scotland, n.d)

41. The blanket bog and grazing contribute more to mitigating global warming than trees.

The potential of peat bogs to store carbon is recognised and is why the deep peat within the scheme area is not being planted, in line with Scottish Policy (UKFS 5, 2023).

Studies have been carried out which identify that sheep in Scotland contribute an estimated 15% to Scotland's agriculture greenhouse gas (GHG) emissions (Scottish Government, 2024) This is a reduction compared to the levels recorded in 1990, however this is contributed to the 33% decrease in sheep livestock numbers (alongside other reductions and changes within agriculture) (Scottish Government, 2024).

42. Concern that deer management will not be carried out properly.

Deer management will be undertaken by a Langholm resident employed by JJSL and Buccleuch Forestry to manage the deer on the ground around Langholm. The most vulnerable species to be planted will require the additional protection afforded by deer fencing or individual tree shelters.



43. Existing native woodland being felled as part of the development.

This is not true, please see points 32 and 33.

44. Loss of hefted sheep, grazing allows a wide range of wildflowers and grasses to survive.

Of the 1051.19 ha management unit area, 55.05% of that will be retained in agriculture. This amounts to 578.63 ha. This land will be let out for grazing, meaning that the majority of the scheme area will remain in its previous agricultural land use. This will allow the flowers and grasses that benefit from grazing to remain. Therefore, when taken in conjunction with the new habitats created as part of these scheme, the breadth of habitat potential will increase.

45. <u>Vegetation survey was carried out in August, missing the spring flowers.</u>

The vegetation survey followed Phase 1 survey standards, which sets out that surveys should be conducted between April and October. Therefore, conducting the survey in August falls within the guidelines.

46. Tarras Valley Nature Reserve (TVNR) cited as ecological mitigation for forestry proposal

Although the TVNR was cited within the Breeding Bird Survey as 'potentially providing a sort of mitigation for the loss of suitable habitat at Warblaw' this is only an observation made by the surveyor and not the view being taken within the woodland creation proposal.

47. Newcastleton Hills (SPA) cited as not within 2km of the woodland creation area

This is an error within the Breeding Bird report. We are aware that the SPA is within 200m of the woodland creation area, which was also cited in the Winter Hen Harrier report.

48. Foraging habitat for Hen Harriers not properly taken into account

The proposed woodland creation scheme would not deprive Hen Harriers of their foraging ground, as over half of the site (55.05%) is being retained as open ground/moorland, thereby continuing to provide the open terrain they require for hunting.

Furthermore, data provided by RSPB shows that limited hen harrier activity has taken place within the boundary of the site, and not since 2022. Additionally, the activity within the scheme boundary was limited to one location which is planned to be retained as open land.

Additionally, the woodland creation would provide additional suitable roosting habitat for hen harriers, as pre-thicket coniferous forests have been found to be the most frequently used habitat by Hen Harriers (Norriss et al., 2002; Barton et al., 2006; Wilson et al., 2009, cited in Hardey et al, 2013). Therefore, before canopy closure at roughly 15 years, the potential for Hen Harrier habitat will increase as a result of the woodland creation scheme.



This is also supported through the data received from the RPSB which shows the distribution of Hen Harrier movement favouring young conifer woodland.

49. The side of Warblaw up from Earshaw Brig has swathes of Bluebells in Spring

Bluebells are ancient woodland indicator species, all of the fragments of ancient seminatural woodland identified by NatureScot have been surveyed to establish their current condition. All areas of known ancient semi-natural woodland are being protected and expanded on by the proposals

50. Location of two veteran juniper trees have been annotated on a map

Thank you, the design will be updated, and the veteran juniper trees retained in an open ground buffer.

51. <u>17th of September 2024</u> - Newcastleton Hills SPA is within 200m of the proposed site and as a result a Habitats Regulations Appraisal (HRA) is likely to be required to fully determine the impacts of this proposal in relation to Hen Harriers.

21-10-24 – A data request was emailed to the RSPB requesting data on Hen Harriers within the Newcastleton Hills SPA to help us to determine whether the Hen Harrier nests are within 2km of the scheme area. Once we have received a response, this section will be updated.

RSPB Response 18-12-24: We are not able to share data regarding nest site locations for breeding Hen Harriers. I believe this was communicated to you during the data request, but apologies if it wasn't. The local Raptor Study Group may be willing to share their data with you, but we cannot provide Hen Harrier nest locations.

Data provided by RSPB on breeding success of Hen Harriers within 2 km of the proposed woodland creation site between 2015 and 2024 states that 7 breeding attempts were made over that period and that only four of these breeding attempts resulted in chicks fledging, (2015, 2016, 2017 and 2024). This suggests that the habitat within the SPA that falls within 2 km of the proposed woodland creation scheme is of a poor quality for Hen Harrier breeding success currently.

14-11-24 – RSPB provided satellite tagging data and heatmap of hen harrier activity within the scheme area and the 2km buffer from 2020 = 2022. I requested data from the last 10 years, implying that they have no record of hen harrier activity within this search area from 2023 and 2024.

The heat map shows the location of the hen harrier activity, the majority of which is located outside the woodland creation area. Where activity has been recorded within the scheme boundary, it is located within an area which is intended to remain as open land.

Although the main areas highlighted on the heatmap will not be directly planted over, consideration needs to be given to the overall effects of this planting on foraging/roosting Hen Harriers and connectivity of suitable habitat. Hen Harriers in Scotland generally prefer to hunt over open ground where their prey of passerines and



small mammals are abundant, and will avoid mature plantations. As a large afforestation scheme has already taken place within this area, consideration needs to be given to the cumulative impacts of the proposed planting at Warblaw. It has been confirmed that some of the registrations of tagged birds relate to young birds that fledged from the SPA, illustrating that there is connectivity between this site and the SPA, and it is therefore important that suitable habitat links are retained between these areas.

52. <u>RSPB 17th of September 2024</u> - No surveys were undertaken specifically for breeding Hen Harrier or any other raptor species.

The survey of raptor species was undertaken as part of the breeding bird survey. A Winter Hen Harrier survey was also undertaken which included extensive background research on the historic presence of Hen Harriers within the scheme area, including contacting the local raptor group.

53. <u>RSPB 17th of September 2024</u> - A data request should be made to RSPB Scotland to obtain Hen Harrier satellite tracking data for the site plus a suitable buffer.

21-10-24 – A data request was emailed to the RSPB requesting data on Hen Harriers within the Newcastleton Hills SPA to help us to determine whether the Hen Harrier nests are within 2km of the scheme area.

14-11-24 – RSPB provided satellite tagging data and heatmap of hen harrier activity within the scheme area and the 2km buffer from 2020 - 2022. I requested data from the last 10 years, implying that they have no record of hen harrier activity within this search area from 2023 and 2024.

The heat map shows the location of the hen harrier activity, the majority of which is located outside the woodland creation area. Where activity has been recorded within the scheme boundary, it is located within an area which is intended to remain as open land.

54. <u>RSPB 17th of September 2024</u> - That surveys to record breeding Schedule 1 qualifying raptor species within the site boundary plus an appropriate buffer are undertaken to inform the HRA for the SPA

The survey of raptor species was undertaken as part of the breeding bird survey. A Winter Hen Harrier survey was also undertaken which also included extensive background research on the historic presence of Hen Harriers within the scheme area.

Furthermore, NatureScot have not requested further surveys to be undertaken for the HRA, but in line with their feedback we have requested data from the RSPB and the Local Raptor Group.

55. <u>NatureScot 11th of October 2024</u> - Contact RSPB and/or local raptor groups to obtain relevant breeding data to held inform if a HRA is required.

21-10-24 – A data request was emailed to the RSPB requesting data on Hen Harriers within the Newcastleton Hills SPA to help us to determine hen harrier activity within the scheme and 2km buffer.



14-11-24 – RSPB provided satellite tagging data and heatmap of hen harrier activity within the scheme area and the 2km buffer from 2020-2022. I requested data from the last 10 years, implying that they have no record of hen harrier activity within this search area from 2023 and 2024.

The heat map shows the location of the hen harrier activity, the majority of which is located outside the woodland creation area. Where activity has been recorded within the scheme boundary, it is located within an area which is intended to remain as open land.

04-11-24 A member of the local raptor group was contacted requesting information on hen harriers within the scheme area and a 2km radius.

56. <u>NatureScot 11th of October 2024</u> - A compartment located at NY36327903 cuts across the moorland, creating a barrier between north and south and potentially increasing impact on ground nesting birds via predators. We recommend that this area is removed from the plan.

This design feedback has been taken into account and the compartment has now been modified to remove the barrier between the north and south.

54. <u>NatureScot 11th of October 2024</u> - Prepare a deer management plan in line with best practice that helps to justify the need for a fence, how deer will be managed, marking to minimise bird strikes, compensatory cull etc

This will be done.

57. <u>NatureScot 11th October 2024</u> - Has there been additional peatland survey work undertaken to inform the design? Peatland management plan should be developed to look at options for repairing the degraded peat on site. Rewetting on other ecological receptors including birds may also need to be looked at.

A peatland survey was undertaken in 2021 which provided data to be used in our mapping system. Deep peat was also identified as part of the soil and vegetation survey. The information provided by all of these sources have allowed us to accurately map the location of deep peat within the scheme.

JJSL will investigate opportunities for Peatland Restoration once a woodland creation application has been approved.

58. <u>NatureScot 11th October 2024</u> - What ongoing management will be given to maintain botanically rich areas?

I would propose none, even the larger areas that are species rich will be difficult to access post planting and impossible to stock fence. Twice yearly strimming will be too frequent and once every 2 years may not be often enough and we wouldn't be able to remove the arisings. If we didn't deer fence the site then they would ulitmately be naturally grazed and perhaps be useful for deer management??

59. <u>Given that forestry development on Warblaw have already had a negative impact on</u> <u>birds and their associated habitat, will Scottish Woodlands produce an up-to-date</u> <u>detailed survey of breeding birds on the hill to examine these impacts to date and to</u>



ensure there are no further negative impacts as a result of further commercial forestry on the hill?

Three bird surveys have been completed covering the proposed woodland creation area, this includes a breeding bird survey, a winter roost hen harrier survey and a black grouse survey. All of these surveys took place several years after the planting of Cockplay and are being used to inform the woodland design.

60. What are the dangers of ignoring the proximity and potential connectivity of these conservation areas to the study site?

Please consult point 60.

61. <u>Why did the Breeding Birds survey use a 'modified' data collection methodology</u> without clearly stating the limitations and implications of this decision?

The 'modified form' of the CBC data collection is in reference the fact that the mapping methodology of CBC is no longer used, having been replaced by the BBS in 1994. This is as the author explained in section 2.3 Breeding Bird Surveys p12.

62. Why did the research not include specific wader or raptor surveys, or indeed gather any evidence from external sources on these species?

External sources were used. The report notes that the NBN Atlas was used to inform breeding bird species within 2km of the site. Please reference section 3.1 Desk Study p15. Furthermore, Scottish Natural Heritage's SiteLink and SNHi website were accessed and also the South West Scotland's Biodiversity Records Centre was contacted for records, please see section 2.1 Desk Study p11.

Furthermore, section 1.1 Background p8, where the report states that 'Raptor and wader species within a 1km buffer around the site were also surveyed'.

Please also consult points 37 and 48.

63. <u>What are the professional qualifications of the additional surveyors and what are the implications of involving different surveyors in the data collection process?</u>

It is common practice to involve more surveys on a scheme of this scale. Both Gillian Dinsmore and Sarah Parkins worked for S.A.P Ecology and Environment Ltd at the time of this survey, of which Sarah Parkin is the co-director.

64. <u>Why did the survey work take place over three days rather than four days? How</u> <u>might this have affected the findings?</u>

Three is a standard frequency of visits.

65. <u>Is the accuracy of the survey results affected by the survey constraint of deep</u> <u>blanket bog affecting site access?</u>

The safety of our contractors is paramount, we would not expect anyone to carry out work which would put them in danger. The use of binoculars with ten-times



magnification as an alternative is understandable and acceptable. Furthermore, as the area was identified as deep peat, no tree planting would be occurring upon this land.

66. <u>There does not appear to be any survey work undertaken in relation to the local bat</u> <u>population. Would it be possible to commission this so that any risks to this protected</u> <u>species may be assessed?</u>

Bat surveys not typically carried out for woodland creation applications, bats are known to roost in old/mature trees, buildings and in caves/mines/tunnels. The work we will be undertaking will not cause any damage to existing trees or buildings and I am not aware of any caves on Warblaw. In fact we are looking to enhance the likely bat roosting and foraging habitat associated with the existing fragments of ancient semi-natural woodland by increasing the area of native woodland and removing livestock so protecting this valuable habitat from further degradation.

67. <u>Solway Ecology, Breeding Bird Survey 22nd of November 2022</u> - Any vegetation clearance or planting must take into account breeding birds and avoid the breeding bird season.

This will be done.

68. <u>Solway Ecology, Breeding Bird Survey 22nd of November 2022 - Should the woodland</u> <u>creation occur, mitigation measures should be undertaken to compensate for the loss</u> <u>of open habitat. These measures should include wide strips of open habitat running</u> <u>through the plantation in north-south and east-west directions to allow free</u> <u>movement of open ground bird species through the plantation.</u>

This has been taken into account within the proposed woodland design.

69. <u>Solway Ecology, Breeding Bird Survey 22nd of November 2022</u> - Areas of mixed native broadleaved and conifer tree planting should be incorporated into the planting scheme to maximise the sites potential to host a diverse avifauna.

This has been taken into account within the proposed woodland design.

70. *Findley Ecology, Vegetation Survey August 2019* - It is recommended that new broadleaved tree planting seek to augment these existing areas with similar species, on appropriate ground, in order to produce a mosaic of broadleaved woodland with other habitats around the site's slopes

This has been taken into account within the proposed woodland design.

71. *Findley Ecology Services, Vegetation Survey August 2019* - There are several plant communities present on the site that are considered, under SEPA guidance, to be highly or moderately dependent on ground water (as denoted by ** or *). Guidance states that species-rich areas of GWDTE should be avoided. At this site, tree planting should generally seek to avoid these areas



Areas if GWDTE identified within the habitat report have been excluded from the woodland creation scheme and will either form some of the open ground allowance or will be designated as other land.

72. <u>Findley Ecology Services, Vegetation Survey August 2019</u> -Species-rich grassland is rare on the site and it is recommended that the neutral species-rich areas around the B7068 and at Hagg's Burn be left unplanted and consideration be given to how to maintain some grazing upon them.

Areas around Hagg's Burn are being retained within agriculture. The area associated with the B7068 will be incorporated as either open ground or fenced out of the scheme as other land, if the latter then this could be grazed in the future.

73. <u>Findley Ecology Services, Vegetation Survey August 2019 - Any grazing management</u> associated with the forestry proposals should aim to ensure that winter grazing is reduced to aid the recovery of peatland and heathland habitats.

This information will be passed on to grazing tenants for areas identified as peat or heath habitats and which will be retained in agriculture.

74. *Findley Ecology Services, Vegetation Survey August 2019 -* No fertilisers should be added to the better grasslands, such as those identified above and within the target notes.

There is no intention to use fertilisers on site.

75. <u>Findley Ecology Services, Vegetation Survey August 2019</u> - Given the scale and <u>quality of the peatland habitats on the site, it is recommended that a peatland</u> <u>management plan be produced and implemented in order to conserve these interests</u>

A Peatland Management Plan will be investigated if the woodland creation application is approved.

76. *Findley Ecology Services, Vegetation Survey August 2019* - Consideration should be given to appropriate drain blockage work in order to maintain and increase bog wetness.

It is our intent to identify historic drains which are redundant/ of an inappropriate slope and block them in order to aid in increasing the wetness of the deep peat. A peatland management plan will be investigated once a woodland creation scheme has been agreed, this would inform which existing drains should be blocked in order to increase the wetness of any deep peat habitats.

77. <u>Findley Ecology Services, Vegetation Survey August 2019 - The area around</u> <u>Auchenrivock Flow does give some cause for concern and its management should be</u>



reviewed in order to assess how the bog there can be maintained to stop the current extent of tree colonisation, with some scrub control probably a requirement.

One of the management objectives of the site will be to remove self-seeded Sitka regen within areas of deep peat. Removal will be undertaken on a 5 year cycle.

78. <u>Findley Ecology Services, Vegetation Survey August 2019</u> - There are large areas with extensive bracken cover. Many of these areas do not have a thick bracken litter underneath but are still grassy (U20a) or are just scattered bracken. If these areas are not to be planted, then it is recommended that bracken control take place in order to ensure that grassland is still available for any grazing animals on the hill.

All areas of U20a fall within proposed planting areas, therefore there is no requirement for bracken control to take place for grazing.

79. <u>Scottish Forestry Feedback, 22nd October 2024 – Acid/neutral flushes have not been</u> identified as sensitive habitats. The current proposal to plant these habitats is not in line with UKFS guidance to protect these habitats.

Acid/neutral flushes have all now been identified and excluded from woodland creation, appropriate buffers between these and any afforestation have been applied.

80. <u>Scottish Forestry Feedback, 22nd October 2024</u> – Consideration should be given to a <u>connectivity between the nearby SPA and the site.</u>

Please consult points 44 and 47.

81. <u>Scottish Forestry Feedback, 22nd of October 2024</u> – There appears to be various small areas of existing native woodland, which are proposed to be isolated in Sitka planting with no buffer.

Thank you for highlighting this. Buffer zones updated which have been added around the native broadleaf areas in question.

82. <u>Scottish Forest Feedback, 22nd October 2024 – Existing ancient semi-natural</u> woodland, trees and scrub should be shown on a map...on the north side of the proposal there seemed to be mature hawthorn present.

Areas of existing ancient semi natural woodland have been mapped and identified on the maps, this was discussed with Scottish Forestry on the 22nd of November 2024 and recognised. As a result of this feedback however, we have changed the symbology of this on the map to make it clearer and have rechecked aerial imagery and included any other small missed areas of existing scrub/woodland

83. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Commission a comprehensive bird</u> survey to identify species and assess any impact from the proposal, incorporating



recommendations into the design. The author should also review the latest design and agree mitigations have been followed.

Several bird surveys have been undertaken to create a comprehensive review of the site, this includes the breeding bird survey which was produced on the 22/11/22 by Solway Ecology, a Wintering Hen Harrier Survey prepared by Wildlife Consulting on the 14/07/21 and a Black Grouse survey which was carried out from the 29/04/24 to 02/05/24.

The breeding bird survey requires renewal in November 2025, therefore it is our intention to commission a second bird survey in the spring to re-assess the breeding bird present on site and ensure that our data is up to date. Furthermore, this survey will be able to take into account the latest design proposal and provide focused feedback.

84. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Commission a comprehensive bird</u> survey with focus on raptor species, particularly Hen Harriers and other notable raptors within the areas given the distance to the nearby Special Protection Area (SPA). The author should also review the latest design to ensure that all recommended mitigations have been implemented.

Several bird surveys have been undertaken to create a comprehensive review of the site, this includes the breeding bird survey which was produced on the 22/11/22 by Solway Ecology, which included an assessment of raptors and waders, and a Wintering Hen Harrier Survey prepared by Wildlife Consulting on the 14/07/2.

Across both surveys, no Hen Harriers were recorded during the field surveys. However the breeding bird survey did record one barn owl.

85. <u>Scottish Forestry Key Issues Letter</u>, 31st July 2024 – Commission a comprehensive bird survey with focus on black grouse, particularly considering the proximity of two leks near the proposed scheme. The author should also review the latest design to ensure that all recommended mitigations have been implemented.

A Black Grouse survey which was carried out from the 29/04/24 to 02/05/24 by Neil MacDonald. Three pairs of red grouse were identified as part of the survey, but no blackcock or grey hen were seen or heard in the vicinity. The report identified that 'The closest active lek to Warblaw Hill is on Perter Rig 6km to the Northeast'.

86. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Commission a comprehensive habitat survey to identify habitats/NVC's and assess any impact from the proposal, incorporating recommendations into the design. The author should also review the latest design to ensure that all recommended mitigations have been implemented.

A habitat survey was conducted by Findlay Ecology Services in August 2019. The findings from their field survey were shared with us as shp files, which we were able to use to help inform our planting boundaries.

87. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Commission a comprehensive</u> mammal survey to identify habitats and assess any impact from the proposal,



incorporating recommendations into the design. The author should also review the latest design to ensure that all recommended mitigations have been implemented.

A mammal survey was undertaken as part of the habitat survey by Findlay Ecology Services in August 2019. Indications of badger, such as snuffle holes, trails and hair, were recorded as part of the field survey, but no setts were recorded.

No recommendations were made in relation to mammals, but once the proposed woodland design has been finalised, we will share this with Findlay Ecology Services to receive their feedback.

88. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Produce a deer management plan</u> prepared at a landscape scale in collaboration with neighbours and other stakeholders <u>such as NatureScot.</u>

This is to be done.

89. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact the local DMG, providing details of application. Collate feedback and provide as evidence along application.</u>

This is to be done.

90. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Contact the local Biodiversity officer and provide details of the application. Collate feedback and provide as evidence alongside application.

The Dumfries and Galloway council biodiversity officer was contacted on the 5/6/24, 27/8/24 and the 10/10/24. They were invited to attend the in-person consultation events, and the online consultation documents were shared with them after the event. On the final date, the consultation information was again shared with them along with the request to send in feedback by the 17^{th} of September.

We have received no feedback from the biodiversity officer.

91. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Contact NatureScot and provide details of the application, considering the potential impact of the nearby SPA and SSSI. <u>Collate feedback and provide as evidence alongside the application.</u>

NatureScot have been contacted as part of this application.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with NatureScot to receive their feedback and to ensure that their recommendations have been taken into account.

92. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Contact neighbours to gain a thorough understanding of the local deer/herbivore population to help inform the DMP.

To be done.



93. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact RSPB and provide details</u> of the application. Collate feedback and provide as evidence alongside the application.

RSPB have been contacted as part of this application.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with RSPB to receive their feedback and to ensure that their recommendations have been taken into account.

94. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact the local raptor group and provide details of the application. Collate feedback and provide as evidence alongside the application.</u>

A representative of the local raptor group was contacted on the 4/11/24.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with the local raptor group to receive their feedback and to ensure that their recommendations have been taken into account.

95. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Contact the local wildlife management officer at NatureScot to gain a thorough understanding of the local deer/herbivore population to inform the DMP. Collate feedback and provide as evidence alongside the application.

To be done.

Soil

96. The scheme will lead to increased soil erosion.

Woodland creation can help to protect the quality of drinking water supplies, reduce flood risks, guard against erosion, landslides and the loss of soils (UKFS 5, 2023).

97. Likes that peat bogs will be protected.

Thank you, we appreciate your comment.

98. Peatland will be destroyed, and Sitka will self-seed into it.

In line with the UKFS, no planting will occur on deep peat, where the peat layer is deeper than 50cm (UKFS 5, 2023). This amounts to 499.35 ha at Warblaw and these areas will be retained in agriculture for grazing. Furthermore, a monitoring objective for the proposed woodland will be to remove any Sitka which has self-seeded into the peat. Sitka spruce does not start being able to produce viable seed until it is around 25 years old, therefore from this point, monitoring of the peat will commence with the target of removing Sitka regen on a 5 yearly cycle.



99. Potential for peatland restoration

Opportunities for peatland restoration on the areas retained in agriculture will be explored by the landowner once the woodland creation has been implemented.

100. <u>The woodland creation is detrimental to peat and carbon capture.</u>

Woodlands are recognised as an important contributor to the capture of carbon. A report by Scottish Forestry in 2022 identified that:

"Currently, Scotland's trees are sequestering 7.6 million tonnes of CO2 each year, the equivalent of 14% of our gross greenhouse gas emissions. This demonstrates clearly how important our woodland expansion plans are in fighting climate change." (Scottish Forestry, 2022).

For information on the schemes impact upon peat, please see point 31, 50 and 51.

101. *Findley Ecology Services, Vegetation Survey August 2019* - Tree planting should avoid areas with a peat depth of greater than 50 cm as per the best practice

Areas identified as having peat at a depth greater than 50cm have been excluded from any afforestation proposals.

102. <u>Findley Ecology Services, Vegetation Survey August 2019</u> - There are peatland vegetation communities present on 30-50cm of peat and effectively represent blanket bog habitat. It is recommended that these areas also be excluded from any planting.

This has been done.

103. <u>Is the removal of soil going to affect the peatland.</u>

No soil will be removed from site. Areas of deep peat, which is peatland 50cm or greater in depth, will not be tracked over, cultivated or planted upon in line with UKFS 5 (2023).

104. <u>Scottish Forestry Feedback, 22nd October 2024</u> - The peat depth survey data and proposed buffers should be shown on a map overlaid with the proposed species.

This has been done.

105. <u>Scottish Forestry Feedback, 22nd October 2024</u> – The hydrology of the peatland must be protected, and the likelihood of Sitka seedlings invading these open habitats and the open hill over time should also be considered and mitigations identified.

Where planting is to occur up slope of any identified deep peat or peatland habitats there will be no new drainage undertaken so that there is no impact on the hydrology of these



habitats, a buffer of 10-15 metres has been applied to these isolated patches of deep peat. Where afforestation is to occur down slope of any deep peats then there will no impact on the hydrology of the feature. Ground cultivation will be via continuous mounder a recognised method of cultivation that has limited impact on hydrology, unless otherwise specified in the Ops Plan.

Please consult point 73 for the proposed monitoring of the deep peat in relation to self-seeding Sitka spruce.

Water

106. <u>Woodland creation will increase flood risks.</u>

Woodland creation can help to protect the quality of drinking water supplies, reduce flood risks, guard against erosion, landslides and the loss of soils (UKFS5, 2023). This can be seen in the work undertaken by the Tweed Form along Eddleston Water. In their efforts to improve Natural Flood Management (NFM) to reduce flood risk and improve riparian habitats, they have increased broadleaf riparian tree planting which has provided direct habitat restoration benefits at the riparian and landscape scale (Tweed Forum, 2021). Furthermore, as stated in their 2021 Eddleston Water Report:

"Riparian tree planting provides a direct climate change adaptation through the creation of 'thermal refugia' from the eventual shading provided by bankside trees, whilst NFM at the landscape scale also helps reduce the impact of increasing climate change-derived flood events."

(Tweed Forum, 2021)

The planting of riparian zones with broadleaf species as part of the Warblaw Woodland Creation has the same goals in mind.

Existing field drains will be assessed at the time of establishment and where they are not currently compliant with the Forestry and Water Guidelines, i.e. greater than 2 degrees and in long continuous lengths, they will be blocked and new drains installed that are compliant This will reduce the amount of fast run-off following wet weather and the associated inundation of watercourses downstream, reducing flooding risk.

107. <u>Woodland creation will increase river pollution ie. acid runoff.</u>

The potential for woodlands to affect water quality in rivers through processes such as acid runoff in minimal in woodlands under 15 years (Forest Research, 2014).

Broadleaf woodlands are less likely to contribute to acidification as they have a higher uptake of nitrogen compared to conifer woods, one of the many reasons broadleaf species are planted alongside watercourses, as is planned for Warblaw (Forest Research 2014). Additionally, pollutant scavenging is believed to have peaked in the 1970's when emissions were at their height and planting of conifer monocultures did not have the same regulations as they do today (Forest Research, 2014). Since then, air quality has improved significantly with the introduction of the emission control policies in the 1980s. As noted in the Forestry Commission 'Forest and surface water acidification' report:

'This has led to a marked chemical recovery and increasing evidence of biological recovery in acidified lakes and streams across all affected regions in the UK...improvements in air quality will reduce forestry's contribution to acidification to a small margin, such that action



to...prevent new planting is unlikely to be required to achieve chemical recovery in many cases'

(Forest Research, 2014)

108. <u>Scottish Water 26th of August 2024</u> - No Scottish Water drinking catchments or abstraction sources within the boundary.

Thank you for your comment.

109. *Scottish Water 26th of August 2024* - Scottish Water assets could be within the boundary, send a map of the proposed plan to HAUC team.

Design will be sent once updated.

110. <u>Scottish Forestry Feedback, 22nd October 2024</u> - Ensure that burns are appropriately buffered and use made of them to create native riparian habitat networks.

All burns/watercourses within proposed conifer areas will have appropriate mapped buffers as per Forest and Water Guidelines, as set out below:



Where watercourses flow through proposed native hardwood planting, the buffers are detailed within the Ops plan. This is because native woodland areas will be planted at variable stocking densities, creating a mosaic of trees and open ground. It is therefore this open ground which will be used to create the buffers for watercourses. This approach has been agreed with Scottish Forestry on the 22nd of November 2024.

111. <u>SEPA, 26th August 2024</u> - What evaluation has SWL undertaken with regards to private water supplies in terms of identifying those households on such and more importantly, ground truthing where their source water comes from and what protective measures have been put in place.

Our evaluation of private water supplies began with a desk based search. Furthermore, our first consultations (3/5/23 & 4/5/23) were very much about gathering information from the local



community on constraints, and this was a question that was asked to consultees, however no further PWS locations were brought to our attention through either means.

During the second round of consultations, a PWS was brought to our attention, this supply being a secondary supply to Middleholm. The supply is not registered with D&G council and there is no deed of servitude in place with the landowner, however the location of this has been ground truthed and updated within our mapping.

Therefore, all main water supplies and the PWS are planned to be in areas of open ground/ open land. A buffer of 15m has been given to the PWS's, wherein it then enters as area of open land and then connects to the property. In the map extract below, the PWS is annotated with the blue dot.



112. <u>SEPA, 26th August 2024</u> - direct communication/engagement is the vital part and its good you spoke face to face as letter drops and e-mails run the risk of missing out on holiday houses etc. The 15m pipe protection sounds good, mapping the exact run of pipes can be tricky. Based on what you've provided, SEPA has no concerns over your proposal.

Thank you for your comment.

113. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Identify water catchments and</u> note any identified pressures, prioritising riparian woodlands where applicable. Address potential impacts resulting from the application through thoughtful design and effective management strategies.



Improving riparian zones has been a priority within the woodland design, with native broadleaf habitats being designed around larger watercourses to create dappled shade for fish, valuable habitat corridors and filtration zones.

114. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Engage with the relevant</u> <u>fisheries trust/board to communicate details of the application. Collate feedback and</u> <u>provide as evidence as part of the application.</u>

To be done.

115. <u>Scottish Forestry Key Issues Letter, 31st July 2024</u> – Contact Scottish Environmental Protection Agency (SEPA) and provide details of the application. Collate feedback and provide as evidence as part of the application.

SEPA have been contacted as part of this application

Once the proposed species design has been finalised this, alongside the application documents, will be shared with SEPA to receive their feedback and to ensure that their recommendations have been taken into account.

116. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Perform an existing drainage</u> survey to identify any non-compliant drains, outlining their extent and necessary mitigation measures. Specify the extent of new drains and ensure alignment with current Forest and Water Guidelines.

To be confirmed with Scottish Forestry.

Air

117. Increase in air pollution from timber transport.

Timber Traffic Management Plans (TTMPs) will address timber transport on public road networks where required by the local Roads Authority. This may limit number of loads per day, or speeds of timber lorries on consultation routes.

Climate

118. Likes that the trees will provide a quick drawing carbon sink.

Thank you, we appreciate your comment.

Land



119. <u>The scheme is a threat to the Tarras Valley Nature Reserve (TVNR) through</u> the spread of self-seeding Sitka spruce. *

Forestry Commission Bulletin 120 (Nixon and Worrell, 1999), referenced by the RSPB (Shewring and Douglas, n.d) identified that, in Britain, 80% of Sitka spruce seed dispersal will travel 60m from the mature tree and that 99% of seed will travel 150m. The TVNR is located roughly 550m from the nearest Sitka spruce proposed. Therefore, the impact from Sitka seed will be negligible.

Furthermore, the direction of dispersal should also be taken into account, as low moisture levels encourage the opening of seed cones, resulting in a greater release of seeds (Nixon and Worrell, 1999). In a study undertaken by Mair (1973, quoted in Nixon and Worrell 1999), it was found that over 10 times more seeds were released by a dry easterly wind as opposed to a moister, westerly prevailing wind.

Wind direction	Total number of seeds trapped	Number of days *
Westerly	55	27
North-easterly	546	24
South-easterly	79	6

(Adapted in Nixon and Worrell, 1999 from Mair, 1973).

The prevailing wind in Scotland originates from the south-west. It can therefore be inferred, due to the above study, that seed release from cones is reduced due to the higher moisture levels present within the wind.

Finally, basic yield class assessment in the Ecological Site Classification (ESC) indicates that improved Sitka spruce should achieve yield class levels of 29 at the area closest to the TVNR, demonstrating that Sitka spruce provides the best use of public funded grant spending within this area.

120. Loss of agricultural land will lead to a threat to our food security. *

Of the 1051.19 ha scheme area, 55.05% of that will be retained in agriculture. This amounts to 578.63 ha. This land will be let out for grazing, meaning that the majority of the scheme area will remain in its previous agricultural land use.

As regarding the threat forestry poses to food security in Scotland, a survey conducted in 2023 by NFU identified the biggest threats to farming businesses. The table below shows the average weight average of what is the biggest threat to businesses on a scale of 1 - 5, with 1 being the least significant and 5 the most (NFU Scotland, 2023).



Threat	Weighted Average
Future agricultural policy	4.5
Prices at market	4.35
Fertiliser	4.31
Fuel Costs	4.24
Cost of concentrate feed	4.24
Utilities Cost	4.2
Prices at point of finishing	4.13
Broader land use policy	3.87
Consumer attitudes	3.84
Biosecurity / Disease outbreak	3.6
Labour Availability	3.35

(NFU Scotland, 2023)

This was, at the time, the largest response to a survey the NFU had ever had, 555 respondents, and forestry (woodland creation/change in land use) was not identified as a significant threat.

An agricultural impact assessment will be undertaken and will form one of the suites of documents submitted as part of the application process.

Additionally, the productive potential of the land on Warblaw is low, with Scotland's Land Capability for Agriculture rating the land as predominantly within 4s, 5s. A significant area is rated at 6.3 – the second lowest rating possible. All of the above ratings are recognised as 'non-prime' arable land and are permitted for planting forestry.

Please see point 62 for further information on the Land Capability for Agriculture

121. <u>Cumulative impact of forestry within the area (request to map all Sitka spruce plantations within the wider context)</u>

What we are able to map is limited to the woodlands under our management. At the consultation we did provide a map showing the wider context of woodlands owned by James Jones.

122. <u>Confirmation of no ploughing</u>

Ploughing will not be used as a method of cultivation. Ground preparation will generally be achieved through a combination of continuous mounding, invert mounding and hinge mounding to provide a raised planting position, improving drainage and nutrient uptake.



123. <u>Scheme is detrimental to the scenic beauty of the area – Langholm Hills Regional</u> <u>Scenic Area</u>

The area of the scheme which falls within the boundary of the Langholm Hills Reginal Scenic area includes the highest species diversity. This comprises species such as, Oak, wild cherry, coastal redwood, juniper, Sitka spruce, Scots pine, silver birch, sycamore, hazel and areas of open ground amongst others. The designation south of Langholm does recognise areas of woodland as contributing to the regional scene. Therefore, it can be argued that the areas of the scheme which fall within the designation do not introduce a new landscape feature and will contribute to the landscape by substantially increasing species diversity and creating valuable woodland and riparian habitats (Landscape Visual Analysis, 2024).

124. <u>Farming land has been taken out of use for a prolonged period to fabricate the</u> assessment that it is not good productive land.

The farming land on Warblaw has not been left fallow and is still actively being grazed. It is the client's intent to keep it grazed right up until the point of planting, in the event that the scheme is approved. Furthermore, the Land Capability for Agriculture system, which is used to determine the potential productivity of the land, considers the physical characteristics of the land - soil, climate and relief (The James Hutton Institute, n.d). This dataset was collected in 1978 and 1981 and has not been updated since (Scotland's Soils, 2017). Therefore, even if land had been taken out of agricultural use for a period of time, this would not impact upon the recommendations made regarding its potential productivity.

Finally, James Jones & Sons Ltd are not responsible for how the land was managed before the site was purchased.

125. Loss of open moorland

Please consult point 27.

126. <u>Commercial profit should be spent in creating infrastructure to access more remote</u> <u>locations</u>

Profit from a woodland creation is not realised until the trees are harvested, roughly 35-40 years after planting. Therefore, to rely on 'commercial profit' to create woodland is not feasible.

127. <u>Why don't the maps show existing forestry plantations i.e. Cockplay</u>

The decision to not show existing forestry plantations neighbouring the proposed scheme was informed by feedback received during the first two consultations in 2023, where consultees reported having difficulty reading the maps. Due to this, the decision to remove extraneous information from the maps was taken, to help consultees understand which areas were being consulted on.

Additionally, a separate map was available at the in-person consultation event showing James Jones owned woodland within the surrounding area. This was not included in the online consultation event for the above reasons.



However updated maps will include Cockplay woodland as a result of this feedback.

128. <u>What will happen after the commercial forestry is felled?</u>

After the areas of commercial forestry are felled, which will be done in phases over a number of years, the areas will be re-cultivated and replanted.

129. Land around Middleholm

Following discussions with the owner of Middleholm, the land immediately around the house is being sold to the owner and removed from the scheme area.

130. <u>*RPID 10th of September 2024*</u> - Request to not plant areas of LCA 4.1 & 4.2 at the southern tip by Tarcoon Farm.

In line with the definitions set out below, the planting of 4.1 land is allowed. Furthermore, as the location of the 4.1 land includes notable areas of proposed species diversity – such as Western Red Cedar – the loss of this land would present a notable blow to the diversity of the scheme.

However, an area of 3.2 land was located upon reassessing the agricultural capability map and, in updating the design, this area has been left as open land and will be retained in agriculture.

--definition of 4.1 agricultural land--

Land research association:

Grade 4: Poor Quality Agricultural Land

Land included within this grade suffers severe limitations that significantly restrict the range and/or yield of crops to be grown. This land is mainly suited to grass with occasion arable crops – the yields of which are variable. In moist climates grass yields are likely to be moderate to high but there are often difficulties in utilisation. Very droughty arable land is also included in this land grade.

On other (non-prime) arable land (grade 3.2, 4.1 and 4.2), agriculture is likely to remain the primary land use, although there may be scope for woodland creation on a slightly larger scale. The quality of the land in a local context, and its environmental sensitivity, should be considered.

Material Assets

131. Why do we need deer fencing?

Deer fencing is used to protect young trees, namely broadleaf species and softer conifers such as Douglas fir, from deer browsing. In 2021, deer numbers were estimated to be



around one million and the damage they can cause to Scotland's forests and land amounts to several million pounds annually (Forest and Land Scotland, 2021).

132. Deer fencing will restrict access*

It is anticipated that the most vulnerable areas of the scheme will be deer fenced so that we can avoid using excessive quantities of plastics, however we do not anticipate any reduction in the ability for pedestrians to access the ground for recreation, self-closing pedestrian/equestrian gates will be provided at strategic locations.

133. <u>Scheme will lead to increased traffic on roads</u>

Traffic increase as a result of the scheme will altogether be minimal. Please note that the below figures are estimates based upon previous woodland creations.

If the scheme is approved, during the ground preparation and planting stage it is estimated that two to four machines will be brought to site, these will then be left until the roading and cultivation are complete. The planting squad will arrive in 1-2 vehicles over a period of weeks until planting is complete.

During the maintenance phase (9 years), traffic will be negligible including 2-3 cars to assess the condition of the crop and carry out any maintenance operations.

The highest levels of traffic will occur when the trees are harvested. Timber Traffic Management Plan (TTMPs) will address timber transport on public road networks where required by the local Roads Authority. This may limit number of loads per day on consultation routes.. The B7068 and B720 are consultation routes for timber transport. The A7 is an approved route with no restrictions currently.

134. <u>Likes the provision of home-grown timber</u>

Thank you, we appreciate your comment.

135. <u>Will deer gates be provided to facilitate access?</u>

Yes, deer gates will be provided to facilitate access.

136. <u>Fencing will have a negative impact on nearby grazing.</u>

A deer management plan will be written, which will include an approach to the compensatory culling of deer to pre-emptively mitigate impact from their displacement.

137. <u>Project is for commercial gain</u>

Please see point 24.

138. <u>The scheme will severely affect the tv reception/ loose it altogether</u>



Consultation with Arqiva have been undertaken and their response was as follows:

"Slow-growth trees such as those proposed in the areas beneath the Arqiva link path are unlikely to cause any issue for 20-40 years where even impacts at that time are envisaged to be minimal."

139. <u>Planting broadleaves in tubes results in no root strength</u>

There is potential drawback to planting in tubes, largely linked to environmental concerns, but negatively impacting upon root strength is not amongst them. Individual tree shelters create a beneficial microclimate within the tube which allows the tree to grow quickly. This can often result in a tree that is imbalanced and top heavy which can then be blown over at a young age. The use of deer fencing to protect the majority of hardwoods would be the preferred method.

140. <u>Where are the access points going to be for planting and machinery parking?</u>

Final design will dictate where these will be located.

141. <u>Scheme will lead to an increase in plastic waste from tree tubes.</u>

Efforts are made to reduce the use of plastics as part of the establishment of woodland creation schemes, such as through erecting deer fencing. Where manufactured products are used, it is part of UKFS 5 that these items should be 'appropriately managed when they stop having functional value to minimise their impact on the environment' (UKFS5, 2023). In line with this, broadleaves in tubes will be assessed from years 5-10 and tree tubes removed depending upon the stability of the tree and establishment rates. Where possible, tree tubes will be recycled. The use of deer fencing to protect the majority of hardwoods would be the preferred method thus reducing the amount of plastic waste.

142. <u>Why are broadleaves not being protected by deer fencing like the commercial</u> <u>spruce.</u>

The potential deer fence map shown at the consultation event does show predominantly native broadleaf species, as well as diverse conifer species being protected by the deer fence.

Diverse conifer species, such as Norway spruce, Scots pine and Douglas fir, are included within the deer fence as they are more palatable to deer browsing that Sitka.

143. <u>Indication of a PWS by Middleholm, and request that no planting or spraying take</u> place around it.

A map pinpointing the location of a secondary PWS has been provided. The location of the PWS will be ground truthed and the mapping update to reflect its location and appropriate buffer.

As regarding spraying, please see point 37.



144. <u>D&G Council Land Management and Access Officer, 4th December 2024</u> - Overall this scheme will make a really welcome addition to recreational access opportunities close to Langholm. I am impressed with the thought that has gone into the creation of new routes and their integration with the existing core path network.

Thank you for your comment.

145. <u>D&G Council Land Management and Access Officer, 4th December 2024</u> -What provisions are proposed to keep the various path routes clear of vegetaion growth as the plating develops?

Please consult point 3

146. <u>*D&G Council Land Management and Access Officer, 4th December 2024 – What type of gates are proposed for the points of access into the scheme and through fencing?*</u>

Self-closing pedestrian gates will be installed within the fence to facilitate access.

147. <u>D&G Council Land Management and Access Officer, 4th December 2024 – Would it</u> be possible to establish a ride in the direction of Bloch Hill?

The proposed route to Bloch hill goes through deep peat, so whilst we would not be able to construct a route there, we can put a self-closing pedestrian gate to allow access to Bloch Hill as a compromise.

148. <u>Scottish Forestry Feedback, 22nd October 2024</u> – Reference has been made to retain 500 ha in agriculture. Please provide further details as to what is proposed and how it will be delivered.

As discussed with Scottish Forestry on the 22nd of November 2024, it is the intent to keep the client flock of historic Langholm sheep to graze on the retained agricultural land at Warblaw. It is also the intent to hire a local shepherd to manage the flock.

149. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Carry out a survey of private</u> water supplies in accordance with best practice guidance to identify sources, pipes and catchments. Outline necessary mitigation measures, ensuring alignment with established best practices.

As part of the consultation event, the location of private water supplies was requested. This private water supply was ground truthed and from this the design was amended to create suitable open ground and broadleaf buffer areas.

150. Scottish Forestry Key Issues Letter, 31st July 2024 – <u>Contact the local roads</u> <u>department and provide details of the application.</u> Collate feedback and provide as <u>evidence as part of the application.</u>



The Dumfries and Galloway Roads officer was contacted on the 5/6/24, 27/8/24 and the 10/10/24. They were invited to attend the in-person consultation events, and the online consultation documents were shared with them after the event. On the final date, the consultation information was again shared with them with the request to send in feedback by the 17^{th} of September.

We have received no feedback from the Roads officer.

151. Scottish Forestry Key Issues Letter, 31st July 2024 – Contact the local environmental health department in relation to PWS and provide details of the application. Collate feedback and provide as evidence as part of the application.

Requirement to be confirmed with Scottish Forestry

152. Scottish Forestry Key Issues Letter, 31st July 2024 – <u>Contact Scottish Power and</u> provide details of the application. The design should incorporate wayleaves and transitional edges to mitigate potential impacts on overhead powerlines. Collate feedback and include as part of the application.

Scottish Power were emailed 16th December 2024 and asked to provide feedback by 15th January. No response was received.

153. Scottish Forestry Key Issues Letter, 31st July 2024 – <u>Contact the local access officer</u> and provide details of the application. Collate feedback and include as part of the application.

The Dumfries and Galloway Council Access Officer has been contacted as part of this application.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with the Access Officer to receive their feedback and to ensure that their recommendations have been taken into account.

Cultural Heritage

154. Scheme will negatively impact on the efforts to make Langholm a tourist destination

A study was conducted in 2023 which researched the 'Impacts of woodland planting on nature-based recreational tourism'. The results, based upon 426 questionnaires, found that the percentage of woodland cover could influence the likelihood of returning visits once overall woodland cover reached 75% to 100% (Iversen et al, 2023). If the Warblaw woodland creation proposal went ahead, woodland cover would not exceed 44.95%. To reference this amount against the study, at 50% woodland cover only 8% were less likely to visit again, against 68% citing 'no difference to visiting again' and 24% 'more likely to visit again' (Irversen et al, 2023).

The study also examined the economic impact of woodland creation and found that it had the potential to increase the revenue derived from nature-based tourism.



Table 1. Monetary value derived from Cumbria Tourism data using the £167 and a per person per visit value.

Woodland scenario	Value £ derived from per person per night spent	Change from current state	Percentage change from current state
Current	£52,965,800		
10%	£63,558,860	+£10,593,060	+ 20%
25%	£62,499,580	+£9,533,780	+ 18%
50%	£61,440,130	+£8,474,330	+ 16%
75%	£52,965,550	- £250	- 0%
100%	£46,610,030	- £6,355,770	- 12%

(Iversen et al, 2023)

At 50% woodland cover, the most comparable percentage to the woodland cover proposed at Warblaw, the potential revenue percentage had increased by 18% (Iversen et al, 2023).

Whilst this study was undertaken in Howgill Fells in Cumbria, and it is accepted that there will be regional differences, the data presented does add to our national knowledge of the relationship between landscape, woodlands and nature-based tourism. Therefore, the results indicate that woodland creation will not cause notable negative impact to the efforts of making Langholm a nature-based tourist designation.

155. <u>Protect the area that characterised the runrig system</u>

The practice of runrig, or rig and furrow, was practiced across Scotland and cannot be said to have been characterised by one locale. An independent archaeological survey has been undertaken and areas that require protection from woodland creation have been identified and suitable open ground buffers identified, these have been accommodated within the design.

156. <u>Warb Law is a local iconic landmark and planting it will present a significant change</u> to the landscape.

It is recognised that the planting proposed will result in a changed landscape, at the same time, the landscape analysis reports that:

"...the proposals would not introduce woodland to an otherwise unwooded area. The proportion of woodland cover within the Site would increase, but the mix of woodland types created, together with the retention of large areas of open ground, would mean that the overriding landscape character of the Site and its environs would not be adversely affected" (Landscape and Visual appraisal, 2024).



The creation design has taken into account maintaining views over Langholm from the summit of Warb Law and retaining landscape features such as archaeology, remnant ancient woodland and areas of species rich grass land and marsh.

See also point 27 about areas being retained as open ground/moorland.

157. <u>Historic sites will be lost</u>

Following feedback from the Dumfries and Galloway Council archaeologist and the recommendations included in the Historic Environment survey, sites identified as requiring a buffer will be retained as open ground with the recommended buffer distance. Two historical sites will have their buffer increased following discussions with the council archaeologist. No cultivation or machine traction will be allowed through these areas, and they will be marked on maps and on the ground during forestry operations.

It is also our intention to create heritage information boards to erect beside historical sites close to the proposed circular paths. There is the potential for local history groups to be involved in the supply of information for these boards which will help not only Langholm residents, but visitors alike to be more aware of the history of Langholm. Information boards will also be erected to provide information on path routes in the woodland and to provide information on the remnant ancient semi natural woodland.

158. The scheme will negatively impact on the cemetery*

Following the feedback we have received from the consultation, an area immediately around the existing cemetery will be excluded from planting and be retained as open ground.

159. Potential historic sites

The sites highlighted on the map have already been identified as part of the Historical Environment survey and appropriate protection measures planned.

160. <u>HES 17th of September 2024</u> - The buffer around the Scheduled Monument (SM4406 Old Irvine Settlement) is below the 20m recommendation. This should be increased to 20m all around the monument.

This has been done.

161. <u>D&G Council Archaeologist 15th of October 2024 - MDG10434/MM05 - Buffer to be increased as per shared SHP file. MM25 - Buffer to be increased as per SHP file. The buffer around the Scheduled Monument (SM4406 Old Irvine Settlement) is below the 20m recommendation. This should be increased to 20m all around the monument.</u>

This has been done.



162. <u>D&G Council Archaeologist 30th of August 2024 - 10 historic sites not addressed as</u> part of the archaeological survey and will require changes to the design.

Comparing the sites identified to the Archaeological survey, all sites bar two were identified within the report and the recommended buffers applied. The two that were not identified will be checked for on the ground prior to proposed operations.

163. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Commission a comprehensive</u> <u>archaeological survey. The author should review the latest design to ensure that all</u> <u>recommended mitigations have been implemented and followed.</u>

A historical environmental desk based assessment and walkover survey was commissioned and produced on the 13th of August by Mott MacDonald.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with Mott MacDonald to receive their feedback and to ensure that their recommendations have been taken into account.

164. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact Historic Environment</u> <u>Scotland and provide details of the application. Collate feedback and provide as</u> <u>evidence, incorporating recommendations into the design.</u>

Historic Environment Scotland have been contacted as part of the application.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with Historic Environment Scotland to receive their feedback and to ensure that their recommendations have been taken into account.

165. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact the local archaeologist</u> and provide details of the application. Collate feedback and provide as evidence, incorporating recommendations into the design.

The Dumfries and Galloway Council Archaeologist has been contacted as part of the application.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with Historic Environment Scotland to receive their feedback and to ensure that their recommendations have been taken into account.

Landscape

166. Scheme will result in a loss of views to and from Warb Law. *

It is recognised that the scheme does present a notable change to the landscape. It is for this reason that the greatest species diversity is located in the area above Langholm, framing the view towards the summit and also expanding upon areas of remnant ancient semi natural woodland.



The creation design also taken into account maintaining views over Langholm from the summit of Warb Law and retaining landscape features such as archaeology, remnant ancient woodland and areas of species rich grass land and marsh.

See also point 27 about areas being retained as open ground/moorland.

Finally, during the consultation events in 2023, consultees were asked to contribute design ideas towards the amenity area (the area above Langholm), such as species to include and special features to highlight. Apart from some consultees pointing out the location of archaeology and springs and providing species suggestions, no other design ideas were suggested.

167. <u>Trees should not break the horizon</u>

In line with UKFS, a rule of thirds is applied when designing forestry on a hill. This entails that forestry occupies two thirds of the visible area and the open ground one third, which is more visually appealing (UKFS, 2023). This is the approach taken with the Warblaw woodland creation design.

168. <u>Landscape visuals do not cover the full extent of the proposal, and several</u> <u>viewpoints were not taken into account.</u>

A request was made during the consultation held in 2023 for landscape viewpoints, and none other than the locations used, were raised. The four photomontage locations were agreed with Scottish Forestry before the landscape architect was engaged.

169. Likes the broadleaf fringe to the planting, but not how the visualisation showed it.

Thank you for liking the placement of the broadleaf planting. The visualisation of the broadleaf planting in straight lines was flawed due to limits in technology. Native broadleaves will not be planted in straight rows, as shown in the visualisation, but will be in varying sized and spaced groups to average 1,600 to the hectare.

170. <u>Request that Sika planting be sympathetic to the hill with 'small organic shapes</u> <u>frequently interspersed with other trees, with paths and open spaces.'</u>

Where possible, planting is being proposed in smaller blocks, for instance in the amenity area, planting is in small blocks with varying species, broken up by paths and areas of open ground. However, this landscape consideration must be balanced with economic productivity. To plant Sitka spruce in small organic blocks would increase the number of edge trees, thereby reducing the percentage of high-quality timber that can be extracted.

171. Land will look scarred after felling.

The visual impact of harvesting is recognised, as such this has already been considered and the following proposals will be implemented to minimise this impact. This includes:



- The southern half of the scheme area, the land below The Rig, will be planted first, with the northern half planted 1 years later. This will help to create age differentiation and help phase the harvesting of the scheme.
- Harvesting will be further spaced out through the inclusion of felling phases. This means that the northern and southern sides will be further subdivided as felling will only cover 1-2 compartments at a time, and not the whole area. Thereby, limiting the extent of the harvested area at any one time.
- Thereafter, harvesting will be further spaced out due to the increase in age diversity across the woodland.

172. <u>Blanket Sitka will significantly alter the natural landscape.</u>

Please refer to points 24, 25, 26 and 36.

173. <u>Request that the trees above Middleholm should be native to a 'generous depth'</u>

Discussions are currently being held with the owners at Middleholm regarding the selling of land. Once the area to be sold has been finalised, design decisions can then be made.

174. <u>Request that the three old oak trees by the Middleholm dyke have enough space</u> <u>from the planting.</u>

See point 94.

175. <u>Ian Dudley, Nicholsons 1st of December 2024</u> - The only element of the assessment that is notably absent is an assessment of the cumulative effects of the other planting schemes within the Site's landscape setting

The cumulative impact assessment will be undertaken by Scottish Forestry, not Scottish Woodlands.

176. <u>Ian Dudley, Nicholsons 1st of December 2024 – With regard to landscape effects</u> upon the Site and its environs, I recognise that there is an existing presence of woodland within this landscape, but this does not escape the fact that 409ha of new woodland will be created, of which approximately 62% of the land area will be productive monocultural conifers, and mostly Sitka spruce.

To assert that a 'monoculture' of conifer is being planted is misleading, any species in a woodland can be considered a monoculture if you do not acknowledge the whole composition.

Furthermore, as expressed in the UK Forestry Standard, the forest management unit must establish a 'diverse composition...so that no more than 65% of the area is allocated to a single species.' As a result of this your assertion that '62% of the plantable area is to be conifer, serves to emphasise the extent to which the species composition within the woodland goes beyond the minimal requirement of UKFS 5.



177. <u>Scottish Foresty Feedback 22nd October 2024 – Further details regarding the</u> proximity of the planting to Middleholm and Skippercleuch.

As regarding Middleholm, please consult point 94.

178. <u>Scottish Forestry Feedback 22nd October 2024 - Species map should show Cockplay</u> woodland to fully understand the design proposal.

Cockplay woodland was removed from the design map shown during the 2024 constulation due to feedback received during the consultation events in 2023 that the maps were confusing to read. However, as agreed with Scottish Forestry on the 22nd of November, Cockplay will be included in the woodland design map using the same symbology as seen on OS maps.

179. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Commission a Landscape and Visual Impact Assessment to identify and assess the significance of impacts. Ensure the LVA considers recent proposals in the vicinity and determines if there are any significant negative impacts.</u>

A landscape and Visual Appraisal was produced in July 2024 by Connected Landscapes.

Once the proposed species design has been finalised this, alongside the application documents, will be shared with Connected Landscapes to receive their feedback and to ensure that their recommendations have been taken into account.

180. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – The proposal should consider</u> and detail the local landscape area, landscape character and the local woodland strategy, providing evidence these have been considered.

To be done.

181. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Contact the local Landscape</u> Officer and provide details of the application. Collate feedback and provide as evidence.

The Dumfries and Galloway council landscape officer was contacted on the 5/6/24, 27/8/24 and the 10/10/24. They were invited to attend the in-person consultation events, and the online consultation documents were shared with them after the event. On the final date, the consultation information was again shared with them with the request to send in feedback by the 17^{th} of September.

We have received no feedback from the landscape officer.

182. <u>Scottish Forestry Key Issues Letter, 31st July 2024 – Consider adjoining woodland</u> creation proposals and identify any potential accumulative impacts on relevant issues,

Agricultural Impact Assessment has been undertaken



Other

183. <u>Request for a full Environmental Impact Assessment (EIA) to be carried out.</u>

EIA to be undertaken.

184. <u>Scottish Forestry Feedback, 22nd October 2024</u> – The accompanying Agriculture Impact Assessment (AIA) should take into account agreed woodland creation proposals, and new woodlands being planned, as well as existing woodland, when assessing impact of this proposal on land available for agriculture.

Included in AIA.

185. <u>Scottish Forestry Feedback, 22nd October 2024 – The proposal's submission should</u> detail the proposed protection approach, any fencing routes and deer/herbivore <u>management plan.</u>

Please consult the Operation Plan for detail on the fencing.

Please consult the Deer Management Plan.



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Appendix

Supplementary and supporting information relating to the Feedback Log.

Top 5 issues raised by respondents		
No. of Responses	Consolidated Question/Statement	%
37	Sikta spruce plantations do not support a varied biodiversity. It will lead to a loss of wildlife/habitat and destroy the soil.	32.17
28	Loss of agricultural land will lead to a threat to our food security	24.35
25	Scheme will result in a loss of view to and from Warb Law	21.74
22	Dislikes the large scale planting of monocultural Sitka spruce for commercial purposes	19.13
22	The scheme is a threat to the Tarras Valley Nature Reserve through the spread of self seeding Sitka spruce.	19.13

Appendix 1 – Top 5 issues raised by public respondents:



Appendix 2 – Statistics based around the population of Langholm:

Statistic based around the Population of Langholm (2,040 according to the 2022 census)		
	Feedback no.	Population %
Total Feedback Responses	115	5.64
Negative Responses	98	4.80
Positive Responses	7	0.34
Neutral Responses	10	0.49

Appendix 3 –Feedback Forms submitted by Save Warblaw Action Group on the 16th September 2024 (SWAG):

• Feedback forms delivered by a member of SWAG recorded 87 completed forms. In going through the forms to input the responses into the Feedback Log, several duplicates were identified, bringing the total down to 63.