



## Appendix 4: Stakeholder consultation

### Consultation during the development of this plan

During the development of this *Strategic Larch Management Plan* and as part of wider communication over issues that *Phytophthora ramorum* presents, Forestry and Land Scotland (FLS) has been proactively engaging with stakeholders and local community groups throughout Cowal. A public “drop in” event took place in July 2022 to inform about *P. ramorum* and our management obligations as a consequence of this. More recently the local community council has been given a preview of these proposals in advance of this draft plan being published on the FLS website to inform and encourage local stakeholders to question any aspect of the plan with FLS staff. An update on *P. ramorum* will also be given as part of FLS’ *P. ramorum* update programme.

The forests around Loch Goil and the wider Cowal area have been served with multiple SPHNs which, due to their mandatory nature, do not accommodate a true consultation process. The approach proposed in this *Strategic Larch Management Plan* introduces an element of public consultation more akin to that of a full 10 year Land Management Plan, but felling coupes have been identified in advance, fixed by the distribution of Larch spp. in the forest. The landscape impact of the felling has been highlighted, with replanting mitigating the long term impact.

The proposed plan was published for consultation on the FLS website. In addition, ongoing stakeholder engagement will include communications on the FLS website and local newspaper, regular updates to community councils, and information boards at key points.

A record of consultation can be found at the end of this appendix.

### Consultation following approval of this plan

Once approved by our regulator Scottish Forestry, this plan will give FLS consent to carry out felling, thinning and restocking work as described throughout this plan. Some types of work that may be required during the lifetime of this plan that requires additional consent, and this includes afforestation (new planting), deforestation, road construction (including facilities required for harvesting operations, restocking and ongoing forest management) and quarry development.

*Process:* When such work is required, plans are submitted to Scottish Forestry for a *Screening Opinion*. The various effects of a project are considered including impacts on population, the environment, landscape and heritage. A *Screening Opinion Request* is expected to include stakeholder engagement as part of the process. Relevant stakeholders may vary depending on, for example, scope of the work or the location, but can be expected to include interested parties such as neighbours, local communities and organisations and the planning authority, Loch

Lomond & The Trossachs National Park. This determines whether the project requires full *Environmental Impact Assessment (EIA)*, which is an in-depth and extensive piece of work also involving stakeholder consultation.

*Specific examples:* Access and harvesting facilities for the coupes in the Riverside area; Donich Glen forest road extension; ATV tracks for establishment purposes within restock coupes.

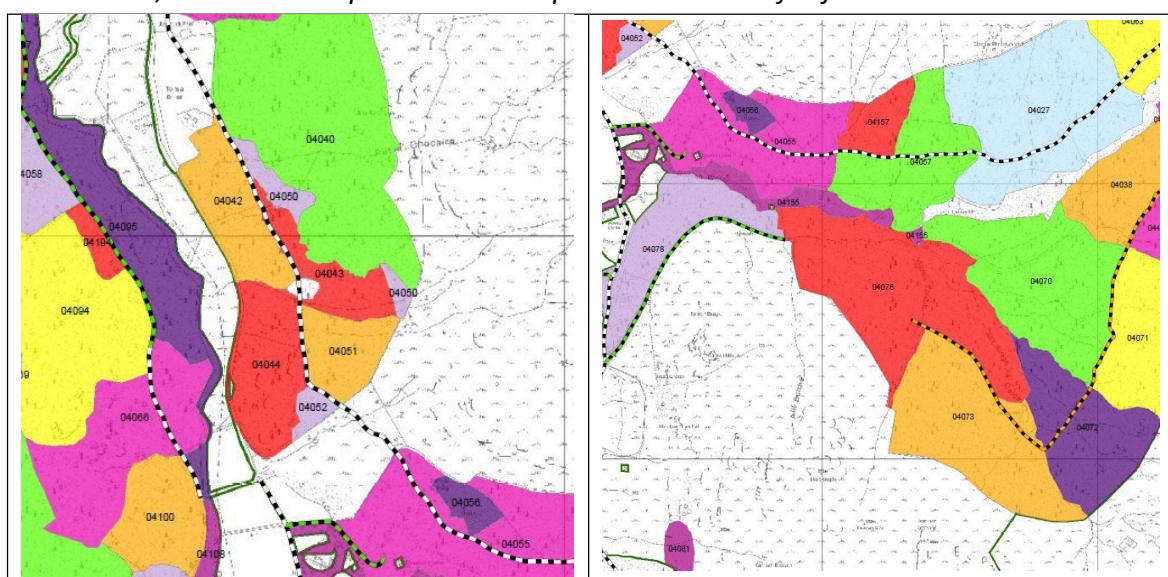
Some work approved via this plan will require specific consultation when they are adjacent to certain features, as described in *Section 1.6*; for example, felling trees beside powerlines requires consultation with the power company.

## Internal consultation

Following approval via this plan, but prior to work going ahead on site, an internal *Work Planning* consultation is carried out within FLS. This identifies the required work and invites input from all relevant FLS teams (including Visitor Services, Environment (ecology), Planning and Operational Delivery) before the responsible delivery team develops a detailed working plan to be approved by senior managers within FLS Central Region. The *Work Planning* process ensures that work will be carried out in accordance with that approved in the plan, and that any sensitive features or constraints are recognized and mitigated appropriately; for example, protecting a private water supply by liaising with neighbours and specifying appropriate mitigations to be put place.

## Changes made to this plan following consultation

*Figures 1a (left) & 1b (right) – In the consultation version of this plan, shown here, coupes 04042 and 04044 (orange and red coupes in the left-centre of Fig. 1a) were to be felled over two felling phases; these coupes will now be combined and felled as one coupe, 04044. Coupe 04076 (red coupe in the centre of Fig. 1b) was to be felled in this plan period in the consultation version shown here; this has been pushed back to phase 2. See text for further details.*



**Strath Gail East:** Roadside coupe 04044 in this plan, this was presented as 04042 and 04044 in the Consultation version with felling phases of Ph1 (04044) and Ph2 (04042) which was in line

with the previous plan. This focused on the area where Larch spp. are concentrated, mainly in the southern area. It is acknowledged after internal discussion that the break between these coupes, following a burn, is not clear enough to provide a green edge that we can be confident would be windfirm; this is not an acceptable risk given this coupe's proximity to the only public road in and out of Lochgoilhead village and Carrick Castle. Hence this will be felled as one coupe (ref. Figure 1a and Map M04 Felling and Thinning).

**Donich Glen:** Coupe 04076 has been pushed back into Phase 2 (i.e. outwith the approval period of this plan). Access to this coupe relies on the planned road being built in Donich Glen. This is not planned until 2026/27 for budgetary planning reasons which means that it may not be possible to clearfell it in the plan period. In the event of an SPHN being served in this area before the road is built, alternative solutions for Larch felling and SPHN compliance may be required (ref. Figure 1b).

**Strath Goil East:** Coupes 04026 and 04037 are now presented with a future element of 20% Sitka spruce, which represents natural regeneration that is expected here on these former Sitka spruce sites (see Map M05 Future Habitats).

**Drimsynie:** Coupe 04046 restocking species has been changed from Mixed Conifers to Native Mixed Broadleaves, acknowledging the proximity to Hell's Glen SSSI, PAWS, and existing and recently established native broadleaf woodland nearby Drimsyniebeg. The Sitka spruce indicated in Map M05 Future Habitats indicates the expectation of natural regeneration on this former Sitka spruce site.

Consultee	Date Sent	Response Received	Issue Raised	FLS Response	FLS Response
Loch Goil Community Trust	10/04/2024	11/04/2024	It's welcome news that some of the larch will be replaced with Native planting. However at first glance, it looks like one of the proposed extraction routes is along phase 2 of the river walk to Drimsyniebeg. When we built the second phase of the River Walk, the paths agreement with FLS (then Sue Morris) was that the first part up to the native oak woodland might be sacrificial as there was a possibility it could be an extraction route but that the remaining extraction would be done from upper forestry paths, leaving the river walk undisturbed. The River Walk is marked on the access and recreation map. However it's not obvious from the plans that there's any protection for the path. We will of course feed this into the consultation but I would be grateful for any assurances you could provide.	16/04/2024	Thank you for the responses received so far to the consultation draft of the Loch Goil Forest Strategic Larch Management Plan. We are currently in a period of consultation, and we will be collating responses for consideration and input into a final version of the plan. This will then be screened by our regulator, Scottish Forestry, followed by a further period of public consultation. The proposed felling areas, including in the area of the Riverside Walk, have been determined by the location of Larch species and the need to leave the remaining forest windfirm and not likely to blow down; this felling has been proposed in the expectation of infection by Phytophthora ramorum, as has already happened in the surrounding area. Please note that there have been no detailed operational site plans devised for this felling as yet, and the responses received from this consultation will feed into any such future operational plans.
		15/04/2024	<i>Further comments raising concern re. potential operations and their impact on the Riverside Walk area were also received indirectly by email from Guy Keating, Recreation &amp; Access Advisor, LLTNP; from Tim King of Loch Goil Community Trust; and by telephone from Alastair Moodie, Chair of Loch Goil Community Trust, requesting clarification and proposing an on-site meeting to discuss.</i>	22/05/2024	CC'd into the reply above. A site meeting took place on 22/05/2024 with representatives from FLS, Loch Goil Community Trust and LLTNP at which the plan and The River Walk was discussed. Also mentioned by Trust representatives was the technical nature of the draft LMP; this will be addressed by including an improved summary or introduction section to the plan, and improving the information published on FLS' website pertaining to the plan.
WoSAS	10/04/2024	11/04/2024	I refer to the above larch management plan, which was sent to us for comment yesterday. I have downloaded details of the proposal from the link provided in your email, and having compared these against information contained in the Historic Environment Record and with available cartographic sources, I would like to make the following comments. Section 1.5.7 of the management plan document states that there are no scheduled monuments within the Loch Goil Forest, and I would agree that this appears to be the case. It goes on to say that there are thirty-five unscheduled heritage features within the forest, with the locations of these being shown on 'Map M07 Designations'. I have imported this map into our GIS, and can confirm that in most instances, the brown 'heritage' polygons shown on it appear to conform to the locations of features recorded in the HER database. In some cases, a single heritage polygon has been used to encompass multiple individual site points. In Gleann Mor, for example, our site record identifies two specific grid references for individual structures ( <a href="https://www.wosas.net/wosas_site.php?id=21284">https://www.wosas.net/wosas_site.php?id=21284</a> ); however, as both of these would fall within the heritage polygon shown on Map M07, this single polygon should be sufficient to ensure that both are taken into account during any forestry operations carried out in the vicinity of them. There do appear to be some instances where features recorded in our system are not represented by a corresponding 'heritage' symbol on Map M07, but it is unclear whether they have genuinely been omitted or if they are simply not visible because the heritage symbol associated with them is too small to be seen at the scale of the map, or is obscured below other symbols. I have listed these apparently 'missing' features below, though I would note that these only represent sites from within the green line boundary showing the extent of Loch Goil Forest. Map M07 also shows heritage features from outside the boundary of the forest, but many of the sites recorded in our system do not appear to be represented.  <a href="https://www.wosas.net/wosas_site.php?id=1793">https://www.wosas.net/wosas_site.php?id=1793</a> <a href="https://www.wosas.net/wosas_site.php?id=66968">https://www.wosas.net/wosas_site.php?id=66968</a> <a href="https://www.wosas.net/wosas_site.php?id=66928">https://www.wosas.net/wosas_site.php?id=66928</a>	17/05/2024	A specific heritage map has been created to accompany this plan to provide greater clarity and to include the additional features identified by WoSAS, and the list of heritage features has also been updated. The FLS Heritage GIS layer will be updated in due course. Three further additional features were identified by as part of this exercise, included in the map and list and WoSAS advised.

		<p><a href="https://www.wosas.net/wosas_site.php?id=21591">https://www.wosas.net/wosas_site.php?id=21591</a>– this is included in the list of heritage features in Appendix III, so it seems likely that the symbol on Map M07 may simply be hidden or too small to be visible at the map scale</p> <p><a href="https://www.wosas.net/wosas_site.php?id=66929">https://www.wosas.net/wosas_site.php?id=66929</a></p> <p><a href="https://www.wosas.net/wosas_site.php?id=66930">https://www.wosas.net/wosas_site.php?id=66930</a></p> <p><a href="https://www.wosas.net/wosas_site.php?id=21260">https://www.wosas.net/wosas_site.php?id=21260</a> – this is included in the list of heritage features in Appendix III, so it seems likely that the symbol on Map M07 may simply be hidden or too small to be visible at the map scale</p> <p><a href="https://www.wosas.net/wosas_site.php?id=21603">https://www.wosas.net/wosas_site.php?id=21603</a></p> <p><a href="https://www.wosas.net/wosas_site.php?id=21596">https://www.wosas.net/wosas_site.php?id=21596</a> – this is included in the list of heritage features in Appendix III, so it seems likely that the symbol on Map M07 may simply be hidden or too small to be visible at the map scale</p> <p><a href="https://www.wosas.net/wosas_site.php?id=1712">https://www.wosas.net/wosas_site.php?id=1712</a></p> <p><a href="https://www.wosas.net/wosas_site.php?id=5371">https://www.wosas.net/wosas_site.php?id=5371</a></p> <p>I have also attached a PDF relating to a turf structure that was identified from NGR 216702 698485, as this feature does not appear in our online database, meaning that I am unable to provide a hyperlink to the associated record; however, this feature also appears to be absent from Map M07.</p> <p>You should ensure that all recorded features present within the forest plan area have been identified and are represented on the relevant maps, particularly where these sites lie either within or in close proximity to areas where larch management works would take place. In addition to these recorded sites, there would also be the potential for as-yet unrecorded features to survive within the area covered by the forest plan. Although a number of small-scale pieces of fieldwork have been carried out within the forest plan area, these have generally been associated with specific development proposals such as hydro-electricity schemes, and have only considered fairly tightly-defined areas surrounding ground that would be affected by construction. So far as I am aware, the majority of the ground within the forest plan has never been subject to a systematic programme of field survey, either pre- or post-planting, meaning that it is fairly likely that as-yet unidentified archaeological material may survive within its boundaries. Forestry operations such as felling could serve to expose material of this type, and should this be the case, measures would need to be put in place to ensure that these were also protected in accordance with UK Forestry standards relating to the treatment of the historic environment.</p>	<p>Noted; known features will be communicated to operational delivery teams via our internal Work Planning process, and any unidentified features picked up in pre-operation and ongoing site checks.</p>
Historic Environment Scotland	10/04/2024	<p>11/04/2024</p> <p>Thank you for your consultation. We have considered your consultation and comment as follows: Historic Environment Scotland is the lead public body established to investigate, care for and promote Scotland’s historic environment. Our comments here concentrate on our statutory remit for world heritage sites, scheduled monuments and their setting, category A-listed buildings and their settings, and historic battlefields and gardens and designed landscapes appearing in their respective Inventories. We note that there are no scheduled monuments, category A-listed buildings or Inventory gardens and designed landscapes within the boundary of the LOCH GOIL FOREST STRATEGIC LARCH MANAGEMENT PLAN and therefore we have no locus regarding this consultation. You may also wish to seek information and advice on matters including impacts on unscheduled archaeology and category B and C listed buildings from your local authority’s archaeology and conservation services if you have not already done so.</p>	<p>Noted; see comments relating to WoSAS above.</p>

<p>SEPA</p>	<p>10/04/2024</p>	<p>11/04/2024</p>	<p>The Plan should maximise opportunities to improve the riparian zone along main rivers, burns and small tributaries to encourage native broadleaf planting and follow the principles as outlined in the Riverwoods Initiative Home   Riverwoods.</p> <p>Good site planning is required to identify and implement good forestry practice measures required to minimise the risk of environmental pollution. For contractors and site managers, reference should be made to the Forestry &amp; Water Scotland "Know the Rules Booklet", version 2, and it is imperative that all contractors follow the guidance therein. On-site tools (confor.org.uk)</p> <p>Prior to work commencement, the Forest Works Manager must produce a Water Management Plan or Diffuse Pollution Plan identifying all site sensitive features, waterbodies and high-risk areas on site. This Plan should be communicated at pre-commencement meetings to all parties working on site and agreed in advance with the landowner.</p> <p>In accordance with the published Scottish Forestry "Cultivation of Upland Woodland Creation Sites -Applicants Guide, 2021", the Plan should incorporate low risk ground preparation techniques during new planting and/or restocking to minimise soil and carbon losses to air and water.</p> <p>SEPA does not hold information on private water supplies [PWS]. It is therefore imperative to contact the Local Authority Environmental Health Department to establish whether they hold any details on any private water supplies in or around your Plan area. All efforts must be made to glean information from homeowners/occupiers on private water supply catchment areas, header tanks and transfer pipework via direct communication and effective consultation. If any of these are identified adjacent to or within the proposed area, then great care MUST be taken to protect water quality. All operations must strive to go beyond compliance with best practice to fully protect the entire supply catchment area. All PWS catchment areas must be afforded maximum protection from machinery damage, compaction and pollution from all forestry activities, including future operations. This also applies to water transfer pipework. The buffer distances highlighted in the Know the Rules Booklet are minimum distances and greater buffers must be allocated where catchment areas are extensive or boundaries unknown. Note that the given 50m buffer is a minimum buffer area and should be exceeded depending on how extensive the catchment area is or if there is any doubt as to the risk of an activity impacting a supply. In the absence of accurate data, catchment areas should be mapped by ground surveying, calculated via desktop assessment or both.</p> <p>Whilst the 50m minimum buffer is intended to afford protection to public and private water supplies, the forest planting design is crucial to protect these supplies from water quantity changes due to forest establishment. Whilst low density broadleaf trees are acceptable around the edges of the water supply catchment area boundary, dense conifers should be kept back from the source area due to the water scarcity pressures they may place upon the supply.</p> <p>Any access tracks should ideally avoid areas of shallow and deep peat to avoid disturbance of peatland ecosystem which may also cause pollution.</p> <p>Prior to site departure, all machinery working within the forest block should be power washed as per good forestry practice to avoid the accidental spread of invasive species. This practice also allows machines to be inspected and repairs identified e.g. oil leaks, tyre wear and metal fatigue. Photographic record of this wash down should be kept for UKWAS audit inspection purposes.</p> <p>For thinning operations, the right machine for the right job is important in order to complete operations without causing pollution issues on site from using oversized machines.</p>	<p>Restocking will be undertaken as per the plan's restocking proposals; this will include appropriate riparian zones and species in line with UKFS.</p> <p>UKFS Forest &amp; Water Guidelines will be followed throughout all operations. Staff and operatives are familiar with this booklet.</p> <p>Constraints are identified and mapped in advance of all operations, and constraints maps are included in the suite of maps provided to and by the site operators as appropriate.</p> <p>FLS is committed to undertaking ground preparation operations that minimise soil disturbance, as appropriate to soil and site conditions.</p> <p>Private and public water supplies have been identified and ground truthed as part of the development of this plan, and PWS owners contacted and given the opportunity to comment. Site ground truthing and liaison with PWS owners will also take place in advance of operations starting. UKFS Forest &amp; Water Guidelines will be followed throughout all operations.</p> <p>Noted; suitable riparian areas for restocking will be identified post-harvesting during the detailed site planning stage. UKFS Forest &amp; Water Guidelines will be followed.</p> <p>Noted.</p> <p>Normal procedure, especially when harvesting Larch / <i>P. ramorum</i> sites.</p> <p>Site operation and supervision is carried out throughout the lifetime of an operation and monitors site conditions and quality as part of this. FLS has an internal Red-Amber-Green system to monitor and manage Health &amp; Safety and environmental conditions.</p>
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		<p>For some thinning compartments, brash and/or product availability is limited, therefore the ability to move product around the whole site to address pollution mitigation will form a key part of work planning and execution. In addition, having a selection of pipes on site will provide good back up for water management to separate clean water from dirty tracks.</p> <p>Any fish barriers should be identified such as old impoundments or abandoned weir structures. This would also include old pipe bridges where multiple smooth lined pipes of small diameter covered with a concrete screed are used to cross watercourses. Any identified features should be flagged for upgrade or removal.</p> <p>If there are any old 'fords' these should be mapped, but only used as follows: intermittent quad bike crossings are acceptable, but heavy forestry machinery traversing watercourses is likely to cause pollution. SEPA would therefore expect to see log bridges as per good forestry practice or culverted water crossings in full compliance with the CAR Regulations <a href="#">car_a_practical_guide.pdf</a> (sepa.org.uk)</p> <p>All drainage from quarries and/or borrow pits must be collected and treated via settlement sumps and natural soakaway areas. This potentially highly polluting effluent must not be allowed to drain directly from site to a watercourse.</p> <p>If the plan is to use tree guard tubes and/or vole guards, then these must come with a tree guard removal plan after the trees are established. Leaving the plastic-based tree/vole guards lying on the landscape is not acceptable and is likely to constitute unauthorised waste disposal. In addition, SEPA fully supports using biodegradable alternatives rather than polypropylene.</p> <p>All waste materials MUST be removed from site for reuse, recycling or disposal upon work completion.</p>	<p>Thinning operations will only be carried out where ground conditions allow. All operations will be carried out in accordance with best practice including UKFS Forest and Water Guidelines.</p> <p>Noted.</p> <p>There are no known fords on the forest road network. All operations will be run in accordance with best practice including UKFS Forest and Water Guidelines.</p> <p>Noted.</p> <p>Treeshelter use and management will be in line with FLS internal waste management procedures.</p> <p>Waste management will be in line with FLS internal waste management procedures.</p>
Drimsyniebeg Farm	10/04/2024	<p>12/04/2024</p> <p>The plan is showing access on a currently dis-used forest track past our house and over a bridge that we upgraded on a user maintained basis under agreement with forestry Scotland and the LLTNP footpath network plans. There is a new 'river footpath' constructed on this route at cost and effort to the community, what will happen to this? And what disruption do you expect to our house at Drimsyniebeg Farm?</p> <p>The track is somewhat undermined by the river as it comes down to Drumsyniebeg farm and is unsuitable for forestry Lorries in any number.</p> <p>Our water supply from Glen Canachadan is not noted in the drawings. Can you give us assurance that it will not be disrupted or damaged, or if damaged who will fix it and how quickly?</p>	<p>16/04/2024</p> <p><i>Replied by email:</i> Thank you for your response to the consultation draft of the Loch Goil Forest Strategic Larch Management Plan. We are currently in a period of consultation, and we will be collating responses for consideration and input into a final version of the plan. This will then be screened by our regulator, Scottish Forestry, followed by a further period of public consultation. With regard to the proposed felling in the area of the Riverside Walk, the felling areas have been determined by the location of Larch species and the need to leave the remaining forest windfirm and not likely to blow down; this felling has been proposed in the expectation of infection by <i>Phytophthora ramorum</i>, as has already happened in the surrounding area. Please note that there have been no detailed operational site plans devised for this felling as yet, and the responses received from this consultation will feed into any such future operational plans.</p> <p>Regarding the road and bridge by Drimsyniebeg Farm, we are aware that this route is not suitable for timber lorries; this route is marked on the maps as part of the road and track network of the forest, rather than a haulage route as such, so apologies for any confusion with our mapping.</p> <p>Finally, your water supply has not been included in the map published online to avoid publishing potentially sensitive information about your water supply. We do have a record of your water supply which I understand draws water at a site to the west of the clearfelled coupe in Gleann Canachadan, and follows the burn to your property. If/when this becomes in proximity to any forestry work it will be protected by the Forest Works Manager of that operation who should also be in contact with you to advise.</p>

			<i>In reply to FLS' response 16/4/24</i> : Yes, that's is helpful thank you for your response and reassurance. Please let us know as the plan progresses. Our track was deemed as not required by forestry at all in the next 40yrs, so we have been responsible for the maintenance ourselves and paid for the bridge replacement ourselves, with only a small contribution from the park for footpath use, so we would need to know if that plans to change.		
SSEN	10/04/2024	16/04/2024	Thank you for including SSEN in the consultation list. SSEN are currently working with a private landowner to assist in their removal of infected Larch between Monevechaden and Lochgoilhead. Due to the terrain and limited scope for access from Hells Glen, SSEN are evaluating relocation of this section of network rather than prolonged outages affecting many customers and hydro schemes throughout the area. This is in very early stages, and it is unlikely work will commence until around 2026 at the earliest, but there are likely to be some worthwhile alignments etc within your phase planning. It is perhaps worth meeting with FLS to discuss coupe shapes and potential felling phase plans to maximise our chances of aligning/ avoid creating any future constraints, if my details could be passed to the relevant planner(s) I'm happy to arrange a meeting to discuss?	12/06/2024  12/08/2024	Replied by email to request further information on SSEN's plans in this area, so as to how or if it might affect the plan, and to identify which teams on the FLS side need to be involved in this conversation.  Further enquiries into this proposal resulted in confirmation from SSEN that the proposals alluded to in June appeared to have been "shelved", but that if things were to pick back up and there were any efficiencies that could be made from co-working between SSEN and FLS, then SSEN would contact us again.
Mountaineering Scotland	10/04/2024	16/04/2024	Thank you for notification of your revision of the Loch Goil LMP in light of the strategic larch management options. Our interest lies with potential effects on mountaineering interests, specifically in this case the visual impact on the special qualities of the landscape for hillwalkers, and obstructions to access through planting and fencing. The main and obvious summit destination you have identified is Ben Donich. However there are other routes followed by walkers that isn't a straight there-and-back trek to the summit. We recommend that in your forest restructuring you consider the informal routes displayed on the Strava Global Heatmap. This will give an idea of where walkers want to go and should assist with planning felling coups and replanting areas as well as crossing points on whatever fences are thought appropriate.  In general we advocate that infrastructure used for land management in the uplands, specifically fencing and tracks, be avoided where possible and be kept to a minimum where it is demonstrated to be necessary. Access points in fences will be required for both formal paths and popular informal routes and request that fences be removed when they are no longer necessary. We suggest that gates should be provided where the fence crosses paths or tracks, or informal routes used to walk or cycle to summits and tops. Crossing points need to be provided at places where people are likely to need to cross the fence, such as hilltops, ridgelines, side ridges where they meet the main ridge, and places where the fence changes direction. Away from paths or tracks stiles, with adjacent dog flap, would be adequate for crossing, especially where the terrain is rough or remote.  Also, the establishment of more natural tree lines in the hills would be desirable, instead of hard-edged conifer plantations, when restructuring forests.		The Strava heatmap is useful further information. While this plan describes the promoted recreation routes only, the Strava heatmap information has been presented to our Visitor Services team who can use this information to inform pre-operation work planning when this level of detail will be most useful.  Our internal Visitor Services team contribute to our pre-operations work plans and take into consideration these recommendations.  This is something that was addressed in the last LMP and this has not been greatly revised in this shorter plan, due to the focus being on larch felling. We have had input from our Landscape Architect in the production of this plan, and there will be a further review of the landscape element of the future forest design in the next full LMP.



<p>Scottish Water</p>	<p>10/04/2024</p>	<p>08/05/2024</p>	<p><i>Drinking Water Protected Areas:</i>                  A review of our records indicates that the proposed plan falls partially within the Donich Water drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Donich Water supplies Lochgoilhead Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number 0800 0778 778. In addition to meeting the UK Forestry Standard (UKFS) and Forests and Water Guidelines, we would request that the "Guidance on Forestry Activities Near SW Assets" is taken into account. Scottish Water have also produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at <a href="http://www.scottishwater.co.uk/slm">www.scottishwater.co.uk/slm</a>.</p> <p><i>Scottish Water Assets:</i>                  A review of our records indicates that there are Scottish Water assets in the area. This should be confirmed however through obtaining plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in the SW list of precautions for assets, which can be found on the activities within our catchments page of our website at <a href="http://www.scottishwater.co.uk/slm">www.scottishwater.co.uk/slm</a>. All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with. In the event that asset conflicts are identified then early contact should be made with the Highway Authorities and Utilities Committee (HAUC) at <a href="mailto:Hauc.diversions@scottishwater.co.uk">Hauc.diversions@scottishwater.co.uk</a>. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the HAUC for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water. Scottish Water have produced a list of precautions for a range of activities. The list of precautions for assets details protection measures to be taken if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. The document/s and other supporting information can be found on the activities within our catchments page of our website at <a href="http://www.scottishwater.co.uk/slm">www.scottishwater.co.uk/slm</a>. It should be noted that the proposals will be required to comply with Sewers for Scotland and Water for Scotland 4th Editions 2018, including provision of appropriate clearance distances from Scottish Water assets. If you have any questions relating to the above, please do not hesitate to contact us.</p>	<p>DWPA identified in LMP maps and will be highlighted in pre-operation Work Planning process. Scottish Water's "Guidance on Forestry Activity near Scottish Water Assets" and additional "Annex 1: Precautions to protect drinking water and Scottish Water assets during forestry activities" will be followed, in addition to UKFS Forest and Water Guidelines.</p> <p>SW assets have been highlighted by Scottish Water in reply of 15/04/2024 and identified in LMP maps, and will be highlighted in pre-operation Work Planning process. Scottish Water's "Guidance on Forestry Activity near Scottish Water Assets" and additional "Annex 1: Precautions to protect drinking water and Scottish Water assets during forestry activities" will be followed, in addition to UKFS Forest and Water Guidelines.</p>
		<p>15/05/2024</p>	<p><i>Just a follow up with some more detailed information:</i>                  There are quite a few assets in and around areas 04511, 04675, 04578, 04055. Assets include a 4" ductile iron raw water main, 225mm combined sewer, 100mm HPPE combined rising main and a number of small diameter water mains around Lochgoilhead WTW.</p>	<p>Advice is consistent with information held geospatially by FLS, and used in the pre-operation work planning process. 04055 has now been felled. 04578 is the arboretum; this and 04511 will see only limited selective felling should an SPHN be served. 04675 is a 2015 planting of mixed broadleaves; work expected here is expected to be small scale and limited to vegetation management and respacing of young trees.</p>

			<p>Some of the proposed activity will take place inside of the Donich Water catchment boundaries, with coupes 04055 and 04578 lying partially within the catchment boundary and 04157, 04076 and 04490 fully within the catchment boundary. This is a relatively small catchment (10.24km<sup>2</sup>) and the proposed work site is located in close proximity to the raw water intake. SW should be notified of any pollution incidents impacting the water course as a result of the work, especially given the short travel time. It is important that during work, drainage is not directed out of the catchment.</p>	<p>Advice is consistent with information held by FLS geospatially, and used in the pre-operation work planning process. In terms of the amount of proposed felling, note that 04055 has now been felled; 04490 was felled some time ago and has been partially cultivated in advance of replanting next winter. 04076 has limited access until forest road is extended, and in the lifetime of this plan may only see selective felling should an SPHN be served. 04578 is the arboretum and will see only limited selective felling of individual trees/small groups.</p>
LLTNP	10/04/2024 19/04/2024	16/05/2024	<p><i>Access &amp; Recreation:</i></p> <p>In 2021/22 the derelict Core Path between Lochgoilhead and Drimsynie (3 km north), was restored by Lochgoil Community Trust using a significant volunteer effort, their own funds and a NPA capital grant. The restoration also received a huge level of support from FLS in staff time and raw materials. The restoration achieved a long-held ambition by the NPA and amongst local residents to provide a level, easily accessible, safe recreational route on a picturesque section of the River Goil. It connects 2 distinct parts of the local recreational path network and extends the range of recreational opportunities available. The new path was constructed to a high standard and is in constant use by people for recreation. Due to its level alignment and smooth running-surface it is popular with elderly people and young cyclists. The path also provides access for on-going community conservation projects including, habitat surveys, bankside stabilization work and native woodland planting. The restored route represents a significant community asset and is a model example for how a community, a state landowner and a National Park Authority can work together to deliver a project of high tangible value, and the project received a good level of national publicity at the time. The NPA appreciate the spread of <i>Phytophthora ramorum</i> in the region must be controlled, and operations to achieve this e.g. around Loch Eck, have been well managed by FLS to date with limited negative effect on recreation and the exercise of access rights, largely due to the existence of robust forest roads. In comparison, the NPA believe the Lochgoilhead – Drimsynie core path is wholly unsuitable for use as an operational / timber extraction route. Due to the history and value detailed above, it has a high level of importance to the local community and would require significant post-felling investment to restore it to the current high standard. The NPA would strongly encourage FLS to examine alternative haulage / transport options e.g. links to the upper forest road.</p> <p><i>Communities:</i></p> <p>Communities Team agrees with all Access/Recreation Team comments. Only to add: A Local Place Plan (LPP) has recently been completed with funding from Scottish Government, and refers with pride to the achievement of Phases 1 and 2 of the River Walk. The LPP proposes an extension to this by “by linking the River Walk with the forestry track to the Rest and Be Thankful and the D-road on the B839, via a new bridge and path over the River Goil” (Lochgoil/Carrick Draft LPP). By law, the LPP proposals must be taken into account when drafting the next Local Development Plan.</p> <p>In addition, it is worth noting the Lochgoil LPP has attracted funding and commendations from both the Park Authority and Scottish Government’s Regional Land Use Partnership (RLUP) Policy Team in relation to the community’s project delivery, skills and aspirations around land-use decision-making and its proposals to develop a local Land Use Forum, which would facilitate improved engagement between the communities and land managers in the area. The project will likely be highlighted by the Cabinet Secretary for Rural Affairs, Land Reform and Island in the pending publication of the Pilot RLUP Programme Evaluation.</p> <p><i>Landscape and Visual:</i></p>	<p>Also highlighted by the Loch Goil Community Trust in their feedback. A site meeting took place on 22/05/2024 to further discuss this area and footpath, and representatives of LLTNP were present. As noted elsewhere, there is currently no detailed operational site plan for the coupes adjacent to The River Walk and the feedback received as part of this consultation will feed into these plans.</p> <p>This link path was discussed at the aforementioned site meeting on 22/05/2024 and would use a spur path off the existing River Walk, crossing non-FLS land, to join up with the forest road network on the east side of Strath Goil. Aside from essential Health &amp; Safety management during forestry operations, there is nothing in this plan that should affect these ambitions as they were described at the site meeting, as the forest road network is accessible under SOAC.</p> <p>Noted.</p>

*Additional Viewpoint* - The Steeple. It is a popular local hill and along the Cowal Way. It gives a different vantage point to the other elevated VP at Ben Donich Summit.

*Designations* - It is unclear on the map if the Heritage outlined area is meant to be the designed landscape of Drimsynie. This designated landscape should be taken into consideration. The Trees and Woodland Strategy (TWS) appendix 4 details sensitivities of Designed Landscapes in relation to woodland creation. It can also assist with changes and enhancements to productive conifer plantation.

*General Comments:*

As detailed in the Strategic Larch Management Plan 2024-2029 the Loch Goilhead area covered in the SLARP makes a significant contribution to the Special Landscape Qualities (SLQs) and character of the landscape and visual amenity. The clear felling will have significant adverse landscape and visual effects until the new planting has established. The reduction of Sitka Spruce and the introduction of a broader palette of species and age diversity will in the long term improve the visual amenity and enhance the Special Landscape Quality (SLQ) of the forested character of this landscape.

*Detailed Comments:*

*Para 3.5 Management of Open Ground:*

Identifies future opportunities for native woodland expansion including montane habitats. The often-abrupt end to the forest leaves a distinctive and unnatural tree-line. This will enhance the SLQ land of Forest and Trees. It is important to note retaining open views to hill summits and prominent landscape features. This is in line with the TWS and we would welcome this in terms of landscape and visual enhancement. We look forward to seeing these future intentions proposed.

*Para 3.8 Deer Management:*

We welcome the reduced reliance on deer fencing. Where fencing is necessary it should follow natural contour lines, avoid geometric shapes. They are inappropriate in areas with strong sense of remoteness and wildness, and alternative options should be used.

*Visualisation design enhancement opportunities:*

The visualisation provided for the golf course currently has a central section that is not proposed for planting. This may be due to land ownership but it provides a good opportunity to engage with the landowners to continue a natural planting design along the whole of the lower slopes. The additional benefit would be to mitigate the visually prominent forest track in this section.

No new quarries are proposed. If it arises that one is required, this should seek EIA screening.

*Timber Transport Routes:*

The Map 006 Roads Access Haulage requires more detail. It is currently unclear if the yellow marked Consultation Routes in the Timber Transport Routes section of the key is being proposed for use. The labelling on the map suggests that the consultation routes marked in yellow will not be used. Concern would be raised on landscape and visual amenity grounds if the section along the lochshore from Lettermay to where the minor road joins the B839 were to be used. Clarity on this would be welcomed.

Similarly, it is currently unclear if the purple marked Restricted Routes in the Timber Transport Routes section of the key are being proposed for use. Clarity on this would be welcomed.

*Consultation Routes Used:*

The current consultation route for the Inveronich and Riverside section, marked as a dashed sea green colour, and the River Goil path marked as an existing forest road raise significant concern in terms of landscape and visual amenity and experiencing the Special Landscape Qualities (SLQs).

This was mentioned as a possible viewpoint in discussions with FLS' Landscape Architect, but not selected in the draft landscape analysis and plan. This VP will be discussed and examined further with our Landscape Architect and considered for inclusion in the final draft of the plan.

A revised heritage map and list has been produced with reference numbers to cross refer, and will be included with Appendix III which should provide greater clarity. As noted elsewhere, this plan has been produced with input from FLS' Landscape Architect and will be restocked as per the restocking map included with this plan.

There has been some investigation into this on FLS' side but this is still aspirational. As noted in section 3.5, much of the open ground above the treeline is currently under long-term grazing lease.

This open ground is part of a long-term grazing lease.

Noted.

As annotated on the Roads and Haulage map, there is no haulage from the Lettermay entrance; all timber traffic is in-wood on the west side of the forest and uses the Drimsynie entrance for access/egress. The public road along the lochside is not part of the haulage route. This map will be revised to make it simpler and easier to interpret.

The restricted routes will not be used for timber transport.

All timber haulage on consultation routes is with prior consultation with Argyll & Bute Council.

The River Goil path marked as an existing forest road is not a forest road. The baseline has changed, and it is now the River Walk footpath. This has changed the landscape and visual character of this part of Strath Goil and it is inaccurate to label the map with this as an existing forest road.

The B839 and the River Walk footpath lie to the east and west of the River Goil which runs along the Strath Goil Floor. In the NP the Strath and Glen Floor is an infrequent landscape type and is significant in terms of its diversity of landscape and scenic character and contrast with the wilder rugged landscape to dramatic effect. The River Goil makes a particular contribution to the scenic qualities.

The open qualities of Strath Goil allows views along and across the attractive River Goil and Farmed landscape as well as to the dramatic highland setting of surrounding slopes and hills. Hills appreciated from Strath Goil include; Ben Donich to the East, Beinn Tharsuinn, Stob na Bione and Mullach Coire a Chuir to the West, Stob East to the north and The Steeple, Cnoc Coinnich, Beinn Bheila to the south.

The B839 is the only road access into Lochgoilhead and is a dramatic gateway. Recent and ongoing improvements to the River Goil and the River Goil pathway have enhanced the landscape and scenic value of Strath Goil. Both, the footpath and B893 provide accessible routes to experience the Special Landscape Qualities of this area of the National Park.

Both proposed routes for timber haulage would significantly effect the landscape character, visual amenity and SLQs.

It is understood that there are challenges to be overcome in felling the Larch in this area, but different approaches must be considered to avoid the significant adverse landscape and visual impacts that will occur on the Strath Goil section including the River Goil footpath and B839.

If it is considered that the current proposals will be taken forward, we would wish for an Assessment of the Special Landscape Qualities (AESLQ) to be carried out for the NP to review. Please note that NS are currently preparing to consult on a revised draft guidance for assessing Special Landscape Qualities and request that once this is publicly available (expected to be May 2024) that this methodology be used instead of the 2017 version.

This amendment can provide an opportunity for further landscape and visual enhancements. It provides an opportunity to further enhance the contribution the Land of Forest and Trees SLQ can have in the Lochgoilhead area. Increasing native woodland, areas with low silviculture, species diversity and opportunities to enhance popular community/visitor destinations/travel routes and local and core paths in the Lochgoilhead area, such West of the River Goil in the Strath Goil area.

*Trees and Woodlands:*

The proposed route for timber haulage on the west side of Strath Goil is a smooth-surfaced footpath. Conversion to a timber haulage route would require considerable upgrade and would be subject to both Prior Notification/Approval and EIA Screening, both of which would require assessment of the impacts of such an upgrade, including on public access.

The National Park's Trees and Woodland Strategy objectives 6 and 7 refer to communities and recreation respectively. Proposals for forest management, including timber haulage, should be made with consideration of these objectives. Whilst the need to remove the larch is acknowledged by the National Park, there remains a need to do so as sensitively as possible.

This track was shown in the maps with the standard legend used on FLS maps for all forest roads and tracks regardless of type or condition; however, this has caused confusion and in a revised suite of maps for the final version of this plan this (and some other tracks) will be represented differently with the legend "Other Forest Roads and Tracks" or something similar. It should be noted that The River Walk is identified separately on the Recreation map accompanying the plan.

The vast majority of timber haulage will be on in-wood forest roads, but in some cases it is essential to use some stretches of public road consultation routes i.e. part of the B839, especially for timber haulage coming from the Drimsynie and Lettermay parts of the forest. This is done with prior consultation with Argyll & Bute Council.

The coupes presented in this plan have been designed to encapsulate as much of the Larch spp. as possible while leaving the remaining forest windfirm. Every effort has been made to minimise the size of felling coupes as described in the plan.

Noted; FLS' Landscape Architect has been advised.

As noted elsewhere and discussed at the site meeting of 22/05/2024, there is no detailed operational site plan for the coupes adjacent to The River Walk; feedback from this consultation will help develop this.

The coupes presented in this plan have been designed to encapsulate as much of the Larch spp. as possible while leaving the remaining forest windfirm. Every effort has been made to minimise the size of felling coupes as described in the plan. Timber Haulage on public roads is done in consultation with Argyll & Bute Council.

Appendix 4 - Consultation Record

			Section 4 of the TWS states that in productive conifer forests there should be 'Careful planning and construction of forest roads and other infrastructure.' Section 5 addresses forest roads and tracks and draws specific attention to UKFS General Forestry Practice Requirement no. 11: 'In Designated areas, for example National Parks, particular account should be taken of landscape and other sensitivities in the design of forests and forest infrastructure.' These comments are made with respect to and in support of the advice given in the recreation and access, communities, and landscape and visuals comments.		Noted.
Various addresses - postcode maildrop	10/04/2024	02/05/2024	<i>Reply received from Fraser Simpson:</i> Feedback on the Loch Goil Forest strategic larch management plan: Full consideration needs to be given to how the removal of the larch and other related clearances and roads/tracks are created. The main point is that currently when this is done it leaves a complete "mess". This impacts the visual amenity for the area and village, impacting locals and visitors. More thought needs to be given to how sustainable forestry is managed and conducted, so that we don't ruin our countryside for years to come. Five or ten year regeneration is not enough to address this impact. <i>[No other responses received]</i>	07/05/2024	<i>Replied by email:</i> Thank you for your response to the consultation draft of the Loch Goil Forest Strategic Larch Management Plan. We are currently in a period of consultation, and we will be collating responses for consideration and input into a final version of the plan. This will then be screened by our regulator, Scottish Forestry, followed by a further period of public consultation. Visual impact is always a consideration in the development of our Land Management Plans. Our plans are developed with input and advice from our Landscape Architect team as we pull our proposals together. Due to our requirements under Statutory Plant Health Notices to remove infected Larch trees, we are acutely aware that this has resulted in a different distribution and possibly larger proportion of harvested sites in the patchwork mosaic of habitats and age structure that we would otherwise be aiming for across the landscape. The requirement for Larch removal presents us with the opportunity to restructure the forest, with improved species diversity including more native broadleaf species, with higher habitat and amenity value and better placed to adapt to climate change. Some areas will be managed by Continuous Cover Forestry, resulting in lower impact silvicultural operations and aiming to maintain the amenity value of a larger element of the sites during the growing cycle across the forest. This is in line with the UK Forestry Standard (UKFS) which sets the objectives for forest management across the UK. I hope this addresses your concerns; please get in touch if you require further information.
Scottish Forestry			No response received		
CONFOR			No response received		
Donich Water Hydro			No response received		
Nature Scot			No response received		
RSPB			No response received		
Argyll Raptor Study Group			No response received		
Argyll & Bute Council			No response received		
Transport Scotland			No response received		
Loch Goil Community Council			No response received		
Cormonachan Community Woodland			No response received		
Argyll Holidays Drimsynie Holiday Village			No response received		
The Loch Lomond and Cowal Way			No response received		
Argyll District Salmon Fishery Board			No response received		
Argyll Fisheries Trust			No response received		
Pole Farm			No response received		
Corrow Farm			No response received		