



Breackerie Wind Farm

Environmental Impact Assessment Report Volume 1 Chapter 14: Forestry

October 2023 (amended December 2024)

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14 FORESTRY

Introduction

- 14.1 This chapter considers the potential effects of Breackerie Wind Farm (the 'proposed development') on forestry.
- 14.2 This chapter is also supported by the following figures as contained within Volume 2: Figures:
- Figure 14.1: Baseline Age Class
 - Figure 14.2: Baseline Felling
 - Figure 14.3: Without Wind Farm Restocking
 - Figure 14.4: Wind Farm Felling Plan
 - Figure 14.5: Wind Farm Restocking
- 14.3 The chapter is supported by a number of Technical Appendices (as set out within Volume 4: Technical Appendices), comprising:
- Technical Appendix 14.1: Sub compartment databases
 - Technical Appendix 14.2: Photographic records
- 14.4 Other relevant chapters include:
- Chapter 3: Project Description;
 - Chapter 8: Ecology;
 - Chapter 6: Landscape and Visual; and
 - Chapter 10: Geology, Hydrology and Hydrogeology.
- 14.5 The author of this Chapter, Neil McKay MICFor, is a chartered forester, a professional member of the Institute of Chartered Foresters since 1994. Neil McKay has more than 12 years of relevant experience in the preparation of Forestry Chapters as part of EIA Reports for a range of wind farms across Scotland.

Legislation, Policy and Guidance

Legislation

- 14.6 The scope of the assessment has been informed by consultation responses summarised in Table 14.1 and the following guidelines/policies:
- Forestry and Land Management (Scotland) Act 2018.
 - Forestry Commission Scotland (2009). The Scottish Government's Policy on Control of Woodland Removal, Edinburgh.

- Forestry Commission (2017). The UK Forestry Standard: The Government's Approach to Sustainable Forestry, 4th Edition, Forestry Commission, Edinburgh.
- Forestry Commission (2017): The UK Forestry Standard Guidelines. Edinburgh.
- The Scottish Government (2019) Scotland's Forestry Strategy 2019-2029. Edinburgh.
- The Scottish Government (2011). Scottish Land Use Strategy. Edinburgh.
- The Scottish Government (2014a). Scotland's Third National Planning Framework (NPF3). Edinburgh.
- The Scottish Government (2014b). Scottish Planning Policy. Edinburgh.
- SEPA (2013): SEPA Guidance Notes WST-G-027 "Management of Forestry Waste".
- SEPA (2014): LUPS-GU27 "Use of Trees Cleared to Facilitate Development of Afforested Land.
- UKWAS (2012) The UK Woodland Assurance Standard, Third Edition, UKWAS, Edinburgh.

Policy

14.7 Chapter 5: Renewable Energy and Planning Policy of the EIA Report sets out the planning policy framework that is relevant to the EIA process and the proposed development. The policies set out include those from the Argyll and Bute Local Development Plan (LDP) relevant aspects of The Scottish Government (2023) Scotland's Fourth National Planning Framework (NPF4), Planning Advice Notes and other relevant guidance.

14.8 Key plans and policies include:

- The Scottish Government (2023) Scotland's Fourth National Planning Framework (NPF4)
- Forestry Commission Scotland (2009) The Scottish Government's Policy on Control of Woodland Removal, Edinburgh;
- Argyll and Bute Woodland and Forestry Strategy 2011

Guidance

14.9 The following guidance has been considered within the assessment Forestry Commission Scotland (2019) Scottish Government's policy on control of woodland removal: implementation guidance;

- Forestry Commission Scotland (2019): Scottish Government's policy on control of woodland removal: implementation guidance February 2019
- UK Forestry Standards (UKFS)
 - Forests and Biodiversity;
 - Forests and Climate Change;
 - Forests and Historic Environment;
 - Forests and Landscape;
 - Forests and People;
 - Forests and Soil; and

Forests and Water.

- SEPA (2017) SEPA Guidance Notes WST-G-027 Management of Forestry Waste; and
- SEPA (2014) LUPS-GU27 Use of Trees Cleared to Facilitate Development of Afforested Land.

Consultation

- 14.10 As part of the Scoping exercise, a consultation exercise was undertaken to inform the design of the proposed development and to seek agreement on potential significant environmental effects that result from the proposed development as well as the scope of any assessment work required as part of this EIA.
- 14.11 The Scoping Opinion was received from Scottish Ministers on 9th September 2022.
- 14.12 Consultation relevant to the forestry assessment was undertaken with Scottish Forestry (SF) who commented on aspects of methodology, sources of information, scope of assessment and cumulative development. A summary of these consultation responses is provided in Table 14.1.

Table 14.1: Consultation Responses

Consultee	Date Received	Consultation Response	Where and how is this addressed?
Scottish Forestry	June 2022	- The EIA Report should justify and provide evidence for the need for woodland removal and the associated mitigation measures. - The applicant should consider the whole ownership, or multiple ownerships, or expands the scope of the forest plan so that to present the relevant information about that forest. - The chapter should describe the baseline conditions of the forest. - The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme. The proposed areas of woodland for felling to accommodate the proposed infrastructures, including access roads, tracks, underground pipes and cables and any ancillary structures.	- The development is within The Slate Forest Complex with woodland removal required. - The six forest ownerships are included in the baseline assessment and throughout the assessment - Tables 14.2, 14.6 and 14.7. show the baseline conditions - The composition changes and the proposed infrastructure are shown in Table 14.8 Summary of Felling and Replanting for Construction and Figure 14.4 Wind Farm Felling Plan

Consultee	Date Received	Consultation Response	Where and how is this addressed?
		- Trees felled must be replanted on-site or compensated for (off-site planting) and these areas must be clearly identified in the plan. - The UK Forestry Standard is the Government's reference standard for sustainable forest management in the UK and provides a basis for regulation and monitoring.	- Replanting on site is shown on Figure 14.5 Wind Farm Restocking and compensatory planting is illustrated in Table 14.10 Compensatory Planting - UKFS is referenced as appropriate

Assessment Methodology and Significance

Scope of Assessment

Effects Assessed in Full

14.13 The following effects were considered to be potentially significant in relation to forestry at the scoping stage and have been assessed in full within this Chapter:

- The total forest cover within the Site and
- The changes to the forest structure within the Site.

Effects Scoped Out

14.14 Secondary effects resulting from forestry activities, including effects on habitats and species, ornithology, hydrology and landscape and visual effects, are considered within their respective chapters of this EIA Report and are not included within this Chapter.

Cumulative Effects

14.15 On the basis that the overall forest resource will be maintained across the board in line with CoWRP and UKFS, then no cumulative effects are anticipated.

Study Area

14.16 The forestry study area is centred on the forests and woodlands within the Site but consider the several forest units which constitute the Slate Complex. The six forest units Cnoc Odhar, Glenbreackerie, Homeston, Lawries Wood, Lochorodale and The Slate are all privately owned, primarily productive coniferous conifer plantations.

Desk Based Study and Data Sources

- 14.17 The compartment schedule or sub compartment database for each forest unit has been provided by the forest managers. This schedule contains, as a minimum, the tree species and planting year with the area in hectares relating to a compartment map.
- 14.18 Scottish Forestry Map Viewer includes the Forest Plans approved by Scottish Forestry (SF) with the start and end periods. This information is summarised in Table 14. 2 below

Table 14.2 Approved Forest Plans by Forest

Forest	Forest Plan type	Case reference	Date approved	Contract end date
Cnoc Odhar	Long Term Forest Plan (LTFP)	4889701	20/02/2015	20/02/2025
Glenbreackerie	Forest Plan (FP)	4655832	12/10/2012	12/10/2022
Lochorodale and Lawries Wood	LTFP	5027702	16/09/2016	16/02/2026
Homeston	FP	4889708	06/02/2015	06/02/2025
The Slate	FP	4889718	13/03/2015	13/03/2025

- 14.19 Scottish Forestry Land Information Search (LIS) is a map based tool allowing searches for environmental features and designations such as Scheduled Monuments, Sites of Special Scientific Interest and Native Woodland that may fall within the area of interest.
- 14.20 Native Woodland Survey Scotland (NWSS) shows native woodland, upland birchwood within the site but outwith the development area. Figures 14.4 Wind Farm Felling Plan.
- 14.21 Ancient Woodland Inventory (AWI) is recorded as Ancient (of semi-natural origin) ASNO 1860 on the periphery of the site but outwith the development area. Figures 14.4 Wind Farm Felling Plan.

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Field Survey

- 14.22 A field survey was undertaken on 14th and 15th February 2023. The field survey undertaken acts as ground truthing against the compartment maps supplied. Visual assessment of tree health and vigour was observed.
- 14.23 Forest ground conditions and cultivation at establishment were noted along with current management activities such as drains maintenance, thinning or felling and specifically replanting.
- 14.24 The tree height assessment, together with observations on cultivation, soil strength and waterlogging assist in predicting adjacent wind throw should felling take place.
- 14.25 Photographic records were also taken and are included in Technical Appendix 14.2.

Assessment of Significance

Sensitivity

- 14.26 Productive conifer plantations are dynamic over time through planned and unplanned interventions, however within any woodland there may be designated conservation areas and areas which are planned for enhancing biodiversity. The criteria for assessing sensitivity as shown in Table 14.3 below:

Table 14.3: Sensitivity Criteria

Sensitivity	Definition and Examples
Very High	Felling and permanent woodland removal on AWI designations and semi natural woodlands
High	Felling and permanent woodland removal on plantations on ancient woodland sites (PAWS) and NWSS
Medium	Felling and permanent woodland loss of productive conifer plantation
Low	Unplanted areas within forest land

Magnitude

- 14.27 The criteria for assessing the magnitude of change for the forestry activities associated with the proposed development is the measurement or scale of felling required, both temporary which will be replanted and that which will be permanent woodland loss to these forests. Permanent woodland loss will be compensated for elsewhere following CoWRP and should also be considered temporary in a Scottish forestry context.

Table 14.4: Magnitude of Change

Magnitude	Criteria
Major	Large scale woodland removal. Felling without replanting
Moderate	Large scale felling with replanting
Minor	Scale of permanent felling in keeping with scale of forest landscape
Negligible	Scale of temporary felling with replanting in keeping with scale of forest landscape

14.28

Significance of Effects

- Productive conifer plantations are dynamic over time through planned and unplanned interventions, however within any woodland there may be designated conservation areas and areas which are planned for enhancing biodiversity. The criteria for assessing sensitivity follows the CoWRP 2019 Guidance: Very High - The removal of large areas of woodland will not be supported
- High - Woodlands with a strong presumption against removal: Annex 2 CoWRP Guidance
- Medium - Woodland removal without a requirement for compensatory planting: Annex 3 Guidance

- Low - Woodland removal with a need for compensatory planting: Annex 4 CoWRP Guidance

14.29 Guidance on assessing the scale of felling, in terms of relationship to the landscape, is provided in the UKFS. Using the 'one third rule', any felling in excess of 495 ha within the Site in a five year felling phase would be considered major, whereas felling of less than 495 ha would be Moderate.

Table 14.5: Significance of Effects Matrix

	Sensitivity			
Magnitude	Very High	High	Medium	Low
Major	Major	Major	Major	Major
Moderate	Major	Moderate	Moderate	Moderate
Minor	Major	Moderate	Minor	Minor
Negligible	Moderate	Moderate	Minor	Minor

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Commented [PC4]: We need another row with negligible as per Table 14.4

Assumptions and Limitations

- 14.30 The forest sub compartment data is provided by the relevant forest managers, these schedules describe the current position regarding species and planting year. The detail in the schedules may include Yield Class assessments and wind hazard class assessments. There may be some minor inconsistencies within the schedules but nothing which undermines the overall assessment.
- 14.31 Forest Plans are subject to review and changes brought about by natural events such as windblow and delays in restocking establishment and landowner requirements and objectives.
- 14.32 By assessing the changes to the forest structure and any permanent woodland loss resulting from the proposed development, a reasonable worst case is assumed whereby the integrity of the woodland as a whole is preserved.

Baseline Conditions

- 14.33 The forestry study area within the proposed development consists of a six privately owned forest consisting of unplanted ground, broadleaved woodland and coniferous plantation. The collective total provided in the compartment schedules is some 1925.40 ha of which 1593.72 ha is woodland, the balance classed as land not under trees is 331.68 ha.
- 14.34 The breakdown by forest unit is shown in Table 14.6 below

Table 14.6 Summary of Forest Areas (ha)

Forest	Woodland area (ha)	Unplanted open ground and water (ha)	Total area of unit (ha)
Cnoc Odhar	202.08	24.57	226.65
Glenbreackerie	301.23	102.15	403.38
Homeston	201.07	29.54	230.61
Lawries Wood	65.39	7.64	73.02
Lochorodale	146.46	156.23	302.69
The Slate	567.77	121.34	689.11
Totals	1484.00	441.47	1925.46

- 14.35 The forest units are at an age where felling and restocking has been undertaken as restructuring under the approved forest plans. The age classes by forest are shown in Table 14.7 and also in Figure 14.1 Baseline age class.

Table 14.7 Summary of Age Class by Forest (ha)

Forest	Planted 1950 - 1999 (ha)	Planted 2000 - 2019 (ha)	Planted 2020 - 2023 (ha)
Cnoc Odhar	166.22	86.31	29.81
Glenbreackerie	52.60	237.68	41.18
Homeston	97.71	63.35	40.02
Lawries Wood	85.09	0	19.64
Lochorodale	123.73	3.34	19.39
The Slate	356.43	90.91	74.70

- 14.36 The summary identifies that there is 881.78 ha of first rotation forest planted mainly in the 1970s and 1980s with a small area of 1950 planting. 706.33 ha of second rotation with the earlier replanting from 2000 now at pole stage development with 224.74 ha being recently replanted from 2020.
- 14.37 Figure 14.2 illustrates the baseline felling by phases and Figure 14.3 the baseline restocking in terms of conifer, broadleaved and open ground.

Identification and Evaluation of Key Effects

Construction Effects

- 14.38 Areas of woodland will need to be felled for the construction and operation of the wind farm, including access tracks, turbine locations and other infrastructure.

- 14.39 To enable construction to take place, the areas of woodland detailed within the permanent and temporary felling must be cleared. Permanent felling for infrastructure includes the turbine crane pad areas with an associated buffer mitigation to protect bats, the felling of additional contiguous areas for wind yield and an area for the substation and battery storage. While the wind farm access track will follow the existing forest track, additional area will be required at the entrance and extension beyond the current track with some widening in places; these areas are included in the sum of permanent felling.
- 14.40 Temporary, or management felling is where areas of planted forest are placed at risk of wind throw due to felling for the wind farm. These areas are proposed for felling to a wind firm boundary. Similarly, additional management felling may be required for the avoidance of leaving small areas of woodland which may be isolated from future access or be uneconomic in size at the time of harvest. Management felling areas will be replanted in-situ. Figure 14.4: Infrastructure felling, illustrates the temporary and permanent felling within the Site.
- 14.41 Within the Site, the areas of woodland to be cleared for wind turbines and associated infrastructure contain mature and semi-mature timber which will be conventionally harvested and exported from the Site using industry standard road going timber lorries. Other areas where the tree size is below marketing as conventional roundwood will be considered for harvesting for a biomass market.
- 14.42 The existing forest tracks are mainly suitable for timber haulage and have been used for this purpose for some years. The Argyll Timber Transport Group in-forest haulage route has been developed for exporting timber from The Slate Complex to the public highway.
- 14.43 Table 14.8 contains the total areas of temporary felling and the area of permanent woodland loss for the proposed development including access tracks and infrastructure. This includes the stand-off buffers for each turbine. Temporary management felling will be replanted in situ. Replanting species will follow the overall woodland owners' objectives and will follow within two years from felling.

Table 14.8 Summary of Felling and Replanting for Construction

Forest	Permanent fell for construction (ha)	% of woodland area (from Table 14.6)	Temporary fell for infrastructure construction to be replanted in situ (ha)	% of woodland area (from table 14.6)	Totals (ha)
Cnoc Odhar	14.80	7.3	7.93	3.9	22.73
Glenbreackerie	8.71	2.9	1.52	0.5	10.23
Homeston	1.00	0.5	0	0.0	1.00
Lawries Wood	9.00	13.8	12.08	18.5	21.08
Lochorodale	0.29	0.2	0.19	0.1	0.49
The Slate	50.09 ¹	3.4	196.78	34.7	246.87
Total	83.89²	3.6	218.50	14.7	302.39

14.44 The areas of conifer plantation including replanted areas of broadleaf to be removed for construction are identified as minor and **Not Significant**. No areas of NWSS or AWI are impacted by the proposed development and the area of woodland removal will be replanted elsewhere as compensatory planting resulting in low sensitivity. The area to be felled for the proposed development is considered minor in context of the Slate Complex of forests.

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14.45 The volume, or mass of timber, to be harvested for construction is calculated as 95,000 tonnes. Brash is to be left on Site and where replanting would take place, tree stumps are to be left in situ in accordance with good forest practice. The implications of stump removal are discussed in the Forestry Commission Research Note "Environmental effects of stump and root harvesting."

14.46 Table 14.9 provides an estimate of volumes and tonnes of marketable timber to be removed from Site. An average Yield Class 16 is used for this calculation. Yield Class is the UK forestry index of productivity of even aged stands of trees. It is measured in units of cubic metres per hectare per year (m³ ha⁻¹ yr⁻¹).

14.47 All timber harvesting operations will follow the relevant guidance to comply with UKFS.

Table 14.9 Timber Production in Hectares and Tonnes

Forest stage	Area to be felled (ha)	Total Tonnes
Mature and semi-mature	271.43	95,000
Non-productive (recent restocking)	34.91	nil
Total	306.34	95,000

¹ 19.13ha is factored into the total eligible for off site compensatory planting as well as the 30.96ha forestry to bog restoration proposal

² This does not include the 30.96ha as forestry to bog restoration would not be expected to be included within compensatory proposals

Restocking

Operational Effects

- 14.48 The remainder of the forest areas will continue to be maintained, felled and replanted in accordance with approved forest plans. On this basis, there would be no operational effects on forestry or woodland.

Decommissioning Effects

- 14.49 At the time of decommissioning any previously forested areas designated as restoration may be replanted with trees in keeping with the Proposed Development's decommissioning plan and the Forest Plans at that time.

Mitigation Measures and Monitoring

Construction

- 14.50 The proposed development requires felling/ clearing of trees for the infrastructure access and stand-off from wind turbines.
- 14.51 The design of the layout and access has taken account of the AWI and NWSS within the forest areas and avoided these sensitive areas.
- 14.52 The felling design has minimised permanent felling to that required by the permanent infrastructure with a keyhole approach proposed to accommodate the required infrastructure.
- 14.53 The scoping opinion from Scottish Forestry refers to Scottish Government's Control of Woodland Removal Policy and other relevant guidance. This recognises that, where woodland removal is required to enable the proposed development, it is expected to be with minimal woodland removal. The scoping report advises that the proposed development falls into the category of woodland removal with a need for compensatory planting.
- 14.54 Compensatory planting is calculated in accordance with Annex 5 of the Scottish Government's Policy on Control of Woodland Removal: Implementation Guidance February 2019. Accordingly, compensatory planting arrangements shall be provided for up to 52.93 ha of woodland. The worst case compensatory planting is summarised in Table 14.10. Opportunities will be taken during construction to reduce felling if deemed unnecessary.

Table 14.10 Summary of Compensatory Planting

Forest	Permanent fell for construction (ha)	Compensatory planting (ha)
Total	52.93	52.93

- 14.55 The Applicant is committed to providing the appropriate compensatory planting 52.93 ha.
- 14.56 Compensatory planting will be subject to a planting plan to the UKFS and approval by Scottish Forestry. As the area required for compensatory planting exceeds the 20 ha afforestation threshold, assuming no part of the land is in a sensitive area, it will be subject to an EIA determination through Scottish Forestry.
- 14.57 Monitoring of forest operations during construction shall be required to ensure compliance with good forestry practice during the felling and replanting operations.

Operation

- 14.58 Forestry activities will be ongoing during operation of the wind farm, however, no mitigation required for forestry or woodland other than following the UKFS guidelines.

Decommissioning

- 14.59 The above controls will be required should any of the decommissioned Site be replanted.

Cumulative Effects

- 14.60 Cumulative effects are not relevant to forestry.

Residual Effects

Construction

- 14.61 The residual construction effects on forestry are a reduction of planted ground within each forest unit, in total by 52.93 ha. However, when considering the proposed mitigation measures, including compensatory planting, the overall magnitude of impact would be negligible and there would be no likely significant effect.

Operation

- 14.62 There are no residual adverse operational effects on forestry.

Decommissioning

- 14.63 There are no residual adverse decommissioning effects on forestry.

Summary

- 14.64 The total forestry study area extends to 2,132 ha of woodland and associated open ground and comprises of six forest units under private ownership.
- 14.65 Tree removal would be required for 52.93 ha to construct the Proposed Development, with a further 218.50 ha as management felling, a total of 271.43 ha for all tree clearance.

- 14.66 The species composition would remain materially unaltered as a result of the Proposed Development whereby the permanent woodland loss is within conifer compartments. Species diversity will increase due to continuing restructuring of the forest to be compliant with UKFS.
- 14.67 As a result of the woodland permanently felled for the infrastructure including tracks, other permanent infrastructure and stand-off distances between trees and turbines would result in a net woodland loss of 52.93 ha. In the absence of mitigation, the effect would be significant.
- 14.68 In order to comply with the Scottish Government's Control of Woodland Removal Policy, compensation planting would be required to mitigate the loss of woodland area. The Applicant is committed to providing appropriate compensatory planting of 52.93 ha. The extent, location and composition of such planting would be agreed with Scottish Forestry, taking into account any revision to the felling and restocking plans prior to the commencement of operation. Compensatory planting shall be evaluated under Scottish Forestry EIA determination.
- 14.69 Following completion of the compensatory planting, the effect of woodland loss is not significant.

Table 14:11 Summary of Potential Significant Effects of the Proposed Development

Likely Significant Effect	Mitigation Proposed	Means of Implementation	Outcome
Construction			
Permanent woodland loss	Compensatory planting will be provided, calculated in accordance with Annex 5 of the Scottish Government's policy on control of woodland removal: implementation guidance February 2019 ³ , taking into account any potential low yield class forest on deep peat, where restoration potential could be realised through the Ardfield Forest restructuring.	Planning Condition requiring scope of compensatory planting to be agreed	Not significant
Increased harvesting with risk to water quality	None required All forestry felling operations must maintain good practice identified in Forestry Commission Technical Note: Protecting the Environment during	Planning Condition requiring scope of CEMP to be agreed	Not significant



Likely Significant Effect	Mitigation Proposed	Means of Implementation	Outcome
	Mechanical Harvesting Operations Good practice timber harvesting. The CEMP will incorporate good practice from The 2 nd edition Forestry and Water Scotland guidelines ⁴ in relation to working around watercourses, including connected ditches and drains.		
Operation			
No significant effect	None	N/A	Not significant
Decommissioning			
No significant effect	None	N/A	Not significant
Cumulative Construction			
Not relevant to forestry	None	N/A	Not Relevant/Applicable
Cumulative Operation			
Not relevant to forestry	None	N/A	Not Relevant/Applicable

References

The Scottish Government (2019). Scotland's Forestry Strategy 2019-2029. Edinburgh

The Scottish Government (2016) A Land Use Strategy for Scotland 2016-2021. Edinburgh

The Scottish Government (2014) Third National Planning Framework (NPF3). Edinburgh

The Scottish Government (2009) The Scottish Government's Policy on Control of Woodland Removal. Edinburgh

Forestry Commission (2017) UK Forestry Standard (UKFS). Edinburgh

The Scottish Government (2018) Forestry and Land Management (Scotland) Act 2018

SEPA (2014) Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS

Scottish Natural Heritage (2019) Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation. Joint Guidance

Argyll and Bute Woodland and Forestry Strategy 2011 (ABCWFS) (www.argyll-bute.gov.uk/planning-and-environment/local-development-plan)