



Scottish
Forestry
Coilltearachd
na h-Alba

Highland & Islands Conservancy
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23rd of May 2019

Mr Mark Ashton
Energy Consent Unit
Scottish Government
via email

Dear Mr Ashton

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity Act (1989) – Section 37 and schedule 8: application for the proposed Kirkan Wind Farm in the Planning Authority of the Highland Council

Thank you for consulting Scottish Forestry on the proposed Kirkan Wind Farm (proposed development).

Scottish Forestry (SF) is the Scottish Government agency responsible for policy, support and regulation of forestry sector in Scotland. As such SF comments on possible impact of development proposals on forests and woodlands.

The Scottish Government's Control of Woodland Removal Policy includes a strong presumption in favour of protecting Scotland's woodland resources.

Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits. First consideration should be whether the underlying purpose of the proposed development can reasonably be met without resorting to woodland removal.

Forestry Commission Scotland (predecessor of Scottish Forestry) provided advice at the EIA Screening stage, in a letter dated the 15th of June 2018. SF welcomes inclusion of technical appendix dedicated to Forestry (Appendix 2) in Environmental Impact Assessment Report (EIA Report) accompanying the application, and the attention given to assessing the existing woodland and the effort to minimise extend of felling required to accommodate the proposed development. SF notes that further felling (beyond the keyhole felling required for construction phase) is unlikely to be required for operational purposes within next 10 years, and that such felling, if and when needed, will be incorporated into Strathvaich Estate's forest plan(s).

In the EIA Screening response FCS indicated that compensatory planting (CP) will be required if woodland is to be permanently removed to accommodate the proposed development, as per Scottish Government's Policy on Control of Woodland Removal (2009). Since above advice was given, a new

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S e Coilltearachd na h-Alba a' bhuidheann-ghnìomha aig Riaghaltas na h-Alba a tha an urra ri poileasaidh, taic agus riaghladh do choilltearachd



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Scottish Government's Policy on Control of Woodland removal: implementation guidance has been introduced and published on Scottish Forestry's website at:

<https://forestry.gov.scot/publications/349-scottish-government-s-policy-on-control-of-woodland-removal-implementation-guidance>

Given the information provided by the Applicant in the technical appendix to EIA Report dedicated to Forestry, SF now asks for compensatory planting of 16.6 ha - area corresponding to net area of woodland loss associated with proposed development, as per *Table 1 Summary of the areas of woodland to be felled during construction*. SF welcomes Applicant's commitment to deliver compensatory planting on Strathvaich Estate (as per Appendix 6.6 of the EIA Report – Outline Habitat Management Plan). SF seeks that compensatory planting is a condition of the planning consent (if granted), and that no tree felling is permitted before appropriate compensatory planting plan is approved by Scottish Forestry.

SF would be happy to work with the Applicant to ensure that the details on location, nature and timing of compensatory planting are appropriate and fully considered.

Kind regards

Redacted

Agata Baranska
Regulations & Development Manager

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