Glen Dye Moor Woodland Creation EIA Scoping Report

Contents

1. Introduction

1.1.1 This Environmental Impact Assessment (EIA) Scoping Report relates to an EIA forestry project at Glen Dye Moor, Aberdeenshire. It is designed to outline the issues which will be included in the Environmental Impact Assessment, and included in the EIA Report. This Scoping Report summarises the issues raised during the EIA scoping meeting held on the 11th of December 2024 and outlines the environmental topics which the proposals may significantly impact.

1.1.2 Scottish Forestry, on behalf of, The Scottish Ministers are obliged under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 to adopt a scoping opinion when requested. Part 3 Section 15(2) details that such a request must include:

- (a) A description of the location of the forestry project, including a plan sufficient to identify the land;
- (b) a brief description of the nature and purpose of the forestry project and its likely effects on the environment;
- (c) such other information or representations as the applicant making the request may wish to provide or make.

1.1.3 The forestry project 'Glen Dye Moor Woodland Creation', includes afforestation, and forest road works. As part of the afforestation, new deer fencing will be erected and there will be a period of establishment of at least five years along with an extended period of deer management.

1.1.4 The applicant is Scottish Woodlands Ltd, on behalf of the landowners. Glen Dye Moor is owned by an investment vehicle, Par Forestry IV L.P., which is managed by Edinburgh based alternative asset manager Par Equity. Par Equity has been actively involved in woodland investment for over 10 years. The sole investor in this vehicle is Aviva Investors.

Scottish Woodlands Ltd is a leading forestry management company with a long tradition of serving forest owners and investors in Scotland and the rest of the UK. Their work is underpinned by an integrated management system accredited to ISO 9001 (Quality), ISO 14001 (Environmental), ISO 45001 (Occupational Health & Safety) and ISO 26000 (Corporate Social Responsibility).

The Company operates throughout the UK from a network of 20 offices. This forestry project is covered by the North East Region led by a dedicated team of Forest Managers, Forest Planners, Environmental Managers, and senior management. Project leads include [redacted] with 20 years working on forestry projects and [redacted] with over 18 years working in the forestry sector, both have extensive experience working on large scale afforestation projects.

1.2 Environmental Impact Assessment Context

1.2.1 Undertaking an EIA scoping study is an important step in the EIA process and is defined by The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. It allows all consultation bodies to consider the key environmental issues relevant to the proposals and to agree on the methodology for the assessment.

1.2.2 The specific aims of this Scoping Report are to:

- Identify potential environmental receptors and ascertain whether the anticipated effects are likely to be significant under the Forestry EIA Regulations and that may require further assessment.
- Provide a basis to agree the scope and content of the EIA with Scottish Forestry.

- Provide a basis for agreeing the appropriate methodologies for undertaking the EIA, based upon an understanding of the available baseline data, site characteristics and best practice methodology relevant to the environmental receptors identified for consideration in the EIA.

- Provide statutory consultees and stakeholders with an opportunity to comment on the proposed development at an early stage, and to contribute their views to the EIA process.

1.2.3 In giving its formal Scoping Opinion, under Section 15 of the Forestry EIA Regulations, Scottish Forestry, on behalf of the Scottish Ministers, is required to engage with consultation bodies and take into account their recommendations within the Scoping Opinion. This opinion will qualify the scope and level of detail of information to be provided in the EIA report. The EIA report must be based on that scoping opinion and must include the information that may reasonably be required for reaching a reasoned conclusion on the significant effects of the EIA forestry project on the environment, taking into account current knowledge and methods of assessment.

Schedule 3 of the Forestry EIA Regulations sets out the information required for inclusion in EIA Reports.

2. Glen Dye Moor Woodland Creation Proposals

2.1 Objectives/Purpose

2.1.1 In relation to afforestation, the proposal objectives are as follows –

- To establish new mixed woodlands providing benefits to communities, protecting and enhancing biodiversity, combating climate change through carbon sequestration, and producing a sustainable timber crop.

- To meet the woodland creation objectives of the Scottish Forestry Strategy, the Aberdeenshire Forestry and Woodland Strategy, the Forestry Grant Scheme, and The UK Forestry Standard.

2.2 Site Description Summary

2.2.1 Glen Dye Moor is located approximately 14km southwest of Banchory, on the edge of the Grampian Mountains in Aberdeenshire. The site covers an area of approximately 6,356 hectares and encompasses the hills of Badymicks, Edendocher, and Clachnaben. The primary access point is near Spittal Bridge on the B974 between Strachan and Fettercairn, with a grid reference of NO647844. Figures 1 & 2 illustrates the location and extent of the proposal area.

2.2.2 The site's elevation ranges from 130m along the Water of Aven in the northeast to 778m at the summit of Mount Battock in the west. The terrain is varied, with two main glens—Water of Aven and Water of Dye—running west to east. Soils include well-drained podzols in the valleys and lower-lying areas, transitioning to more organic soils with increasing altitude. Significant areas of blanket peat are present. The site is predominantly heathland, with grass pasture in lower areas.

2.2.3 The Water of Dye and Water of Aven are part of the upper reaches of the River Dee SAC (Special Area of Conservation), underscoring the ecological importance of the waterways and associated habitats.

2.2.4 Glen Dye Moor has a long history of use as a deer forest and grouse moor. Recreational activities include walking, cycling, and horse riding, with Clachnaben being a particularly popular destination. A publicly accessible bothy is also located within the site.

2.2.5 The site contains several cultural heritage features, which will be further assessed during the EIA process to determine their significance and potential impacts.

2.2.6 The EIA Report will provide a comprehensive site description based on detailed surveys, including peat surveys, ecological assessments, breeding bird studies, landscape analysis and archaeological investigations. This will ensure that the key environmental and cultural aspects of the site are thoroughly addressed.

2.3 Proposal Summary

2.3.1 The proposal will meet the objectives at Glen Dye Moor through afforestation of native and commercial woodland through natural regeneration and planting, deer fencing and new roading.

2.3.2 Figure 3 shows the new woodland location, fence line and new roads.

2.3.4 The proposal includes:

- Approximately 690 net hectares of new native woodland establishment through natural regeneration.
- Approximately 1,420 net hectares of new native woodland (Native Scots pine, upland birch and montane scrub) establishment through new planting, including ground cultivation and tree planting, along with associated maintenance.
- Approximately 640 net hectares of new productive woodland establishment of Scots pine, Sitka spruce and a minor component of other conifer species, through new planting. This will include ground cultivation and tree planting, along with associated maintenance.
- Utilisation of new and existing deer fencing will protect new woodland establishment. The total length of fencing is approximately 45,700m including almost 11,000m of existing deer fence that will be retained. The fencing will include the installation of gates to maintain and enhance recreational access. Grouse droppers will also be installed where required to reduce risk of bird collisions.
- New forest roading (approximately 2,240m), including associated water course crossings, drainage and sourcing of materials.
- Deer management, including the preparation of a deer management plan.

2.3.5 Relevant legislation and industry best practice will be followed in the design, implementation and management of this proposal. This includes, but not limited to, The Water Environment (Controlled Activities) (Scotland) Regulations 2011, the UK Forestry Standard along with supporting guidance such as 'Managing Forest Operations to Protect the Water Environment', and 'Cultivation for Upland Productive Woodland Creation Sites – Applicants Guidance'.

2.3.6 The EIA Report will provide a project description including;

1. Purpose,
2. Site Plan and Design,
3. Size/scale,
4. Alternatives, and
5. Methods.

2.3.7 The EIA process is an iterative one and the final design may change from the design initially scoped. The EIA Report will describe the final design, accounting for the analysis of impacts and proposed mitigations.

2.3.8 The EIA Report will include an assessment of alternatives.

Alternative options will include:

- **Do Nothing**: The proposals are not carried forward.
- **Woodland Design**: the type, extent, method of establishment or density of the woodland is changed.
- **Deer Management**: Deer control used with no deer fencing.

3. Scoping Meeting

3.1 Early-stage due diligence consultation has been carried out for the proposals at Glen Dye Moor. A multifaceted approach including a dedicated website, public drop-sessions, consultation letters, attendance of meetings, arranging site visits and on-going engagement with key stakeholders has taken place over a period of time from 2022 to 2024. This has identified the key sensitivities.

3.1.1 A summary of all due-diligence consultation, along with all of the consultation correspondence, has been provided to Scottish Forestry as part of the EIA Screening Opinion requests.

3.1.2 Scottish Forestry has populated an Issues Log that details the issues raised and Scottish Forestry's comments on these. This can be found in Appendix 1

3.2 An EIA scoping meeting was held on the 11th December 2024. This meeting was attended by identified consultees, agreed with Scottish Forestry. Most of the consultees have actively participated in the due diligence process and have a good understanding of the project. The purpose of the meeting was to help define the level of detail necessary and to ensure that all the likely significant impacts that must be covered in the EIA Report are identified as early as possible; and that consultees and stakeholders are given an opportunity to discuss and recommend the survey methodologies that will be used for the environmental assessment. The issues identified on the Issues Log were used to form the structure of the discussion points.

3.3 Prior to the meeting information was made available via the project website detailing the proposal with supplemental information provided as needed.

3.4 List of attendees

Name/Occupation	Company/Organisation
[redacted]	Finzean Community Council
[redacted]	Scottish Water
[redacted]	Botanical Society of Britain and Ireland
[redacted]	Coriolis Energy
[redacted]	Independent Golden Eagle Specialist
[redacted]	Aberdeenshire Council
[redacted]	Outdoor Access
[redacted]	SEPA
[redacted])	River Dee Trust & Dee District Salomon Fishery Board
[redacted]	Aberdeenshire Council
[redacted]	James Hutton Institute
[redacted]	Independent Merlin Specialist
[redacted]	NatureScot
[redacted]	Glen Dye Estate
[redacted]	Scottish Forestry

[redacted]	Scottish Forestry
[redacted]	Scottish Forestry
[redacted]	Scottish Forestry
[redacted]	Scottish Woodlands Ltd
[redacted]	Scottish Woodlands Ltd
[redacted]	Par Equity
[redacted]	Par Equity

3.5 Written feedback from Historic Environment Scotland (HES), Aberdeenshire Council's Archaeologist and Royal Society for the Protection of Birds (RSPB) was received as they were not able to attend the meeting. This feedback was shared at the meeting.

3.6 Minutes of the meeting can be found in Appendix 2

3.7 The EIA Scoping meeting resulted in an agreed list of likely significant issues which have been included in this report along with issues agreed to be scoped out of the final Environmental Impact Assessment as significant likely issues. Those issues scoped out were agreed to be referenced within the proposal context in the EIA Report.

3.8 A copy of this EIA scoping report has been provided to those participating in the EIA Scoping meeting.

4. Issues Proposed to be Scoped Into the EIA and Included in the EIA Report

The key sensitivities and likely environmental effects have been identified through the due diligence consultation and EIA Scoping meeting.

For each issue listed, the following information is outlined:

- Note on inclusion of the issue into the EIA
- Brief description and site context: Summary of known site details and findings from surveys carried out to date to determine the baseline sensitivity/condition, including consultees supporting its inclusion
- Information sources: used to identify location, extent, or detail of the issue
- The potential likely effects from afforestation, fencing and roading
- Brief list of possible mitigations to be considered in the EIA
- Assessment strategies or methodologies to inform the level of significance of effects and be included within the EIA Report

4.1 River Dee Special Area of Conservation (SAC)

4.1.1 The River Dee SAC has been identified as a sensitive receptor for inclusion in the EIA Report and has therefore been scoped in.

4.1.2 Special Areas of Conservation (SACs) are protected areas in the UK, designated under:

- the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales (including the adjacent territorial sea) and to a limited extent in Scotland (reserved matters) and Northern Ireland (excepted matters),
- the Conservation (Natural Habitats &c.) Regulations 1994 (as amended) in Scotland,
- the Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) in Northern Ireland, and
- the Conservation of Offshore Marine Habitats and Species Regulations 2017 in the UK offshore area.

These regulations require establishment of a network of important high-quality conservation sites that will make a significant contribution to conserving the habitats and species identified in Annexes I and II, respectively, of European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, known as the Habitats Directive.

4.1.2.1 The River Dee SAC is notified for its population of Annex II species as noted below from the JNCC[1].

Freshwater pearl mussel *Margaritifera margaritifera*
The Dee is a major east coast Scottish river, which flows uninterrupted for some 130 km from its upland reaches in the high Cairngorms to the North Sea. It supports a functional population of freshwater pearl mussel *Margaritifera margaritifera*, which is common in the Dee, recorded from a location approximately 30 km from the river source to approximately 6-7 km upstream from its mouth. Juveniles make up approximately 30% of the recorded population, among the highest proportions recorded in Scotland. This indicates that the population is recruiting strongly and is one of the most important in the UK.

Atlantic salmon *Salmo salar*
The River Dee supports a high-quality Atlantic salmon *Salmo salar* population in a river draining a large catchment on the east coast of Scotland. There is a weak nutrient gradient along its length, but it is essentially a nutrient-poor river. The high proportion of the river accessible to salmon has resulted in it supporting the full range of life-history types found in Scotland, with sub-populations of spring, summer salmon and grilse all being present. The headwaters which drain the southern Cairngorm and northern Grampian mountains are particularly important for multi sea-winter spring salmon, but there has been a significant decline in their abundance in recent years. The extensive areas accessible to salmon means the River Dee supports a significant proportion of the Scottish salmon resource. In recent years it has contributed about 4 or 5% of all salmon caught in Scotland.

Otter *Lutra lutra*
The Dee is a major east coast Scottish river, which flows uninterrupted for some 130 km from its upland reaches in the high Cairngorms to the North Sea. Surveys have indicated that the otter *Lutra lutra* is found throughout Dee catchment, from its mouth at Aberdeen to many of the high-altitude lochs. The river system contains extensive areas of suitable habitat for otter feeding, resting and breeding, including watercourses with a high fish biomass and islands and marshy areas for resting. This is a strong, high quality population, representative of north-east Scotland.

[1] JNCC website. https://sac.jncc.gov.uk/site/UK0030251. Accessed 17 December 2024.

4.1.2.2 The River Dee SAC, its designated populations of Annex II species, and their related habitats were put forward by NatureScot and agreed for inclusion in the EIA Report.

4.1.3 The following information sources were used to identify sensitivities:

- **NatureScot Sitelink**
- **River Dee SAC Management Statement**
- **correspondence with NatureScot**

4.1.4 The potential likely effects from afforestation, fencing and roading include:

- **Habitat Modification**: Creation of riparian woodland resulting in shading, nutrient and organic material input, bankside stabilisation of watercourses. This will also include improvement of breeding habitats.
- **Breeding site damage or disturbance**: During operations, works result in direct damage or disturbance to active designated species breeding sites, resting locations, spawning beds, or other structures or locations critical to the designated population.
- **Hydrological Change**: Changes to local water tables or changes to peak flow runoff due to afforestation and road construction. This may also include natural floodwater abatement effects and water temperature changes with reduced solar exposure.
- **Diffuse and point-source pollution**: Resulting from operational spills of oil, fuel, or other chemicals, as well as potential sediment run-off following soil disturbance.

4.1.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Riparian Planting**: Creation and expansion of riparian woodlands.
- **Pre-operational surveys**: Prior to commencement of operations sites will be assessed for active designated species breeding sites.
- **Diffuse Pollution Planning**: During the planning stage of operations an assessment of diffuse pollution risk and instructions for prevention techniques will be carried out and form part of contract materials.
- **Emergency Planning**: Ensuring all operational contracts include emergency response plans and prevention techniques to reduce risk of pollution.

4.1.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- River Dee SAC Conservation Advice Package[2]

  Scotland's SACs have some of the best examples of nature in the country, and we want this to continue. Conservation Advice Packages have therefore been prepared by NatureScot to help owners and occupiers of these sites, competent and relevant authorities, and anyone else with an interest in them to achieve this aim. The documents: revise and update conservation objectives for the features of each site; clarify the essential site-specific elements needing to be in place in order for the conservation objectives to be achieved; This will assist competent authorities undertaking Habitat Regulations Appraisal (HRA) of projects and plans; advise on management needed to achieve the conservation objectives, identifying existing conservation measures, where further site specific management may be required and, where appropriate, site specific conservation measures.
- Protected Species Surveys

  Survey for key faunal species protected by nature conservation designations &/or listings has been undertaken within the site. This includes otters. Watercourses within the site and a 250 m buffer were surveyed for otter field signs following

[2] NatureScot. 2020. River Dee SAC Conservation Advice Package. https://sitelink.nature.scot/site/8357. Accessed 20 December 2024.

standard guidance[3]. Evidence includes: • Holts are underground dwelling place including tunnels within bank sides, underneath root plates or boulder piles, or man-made structures, such as disused drains. Otters may use holts permanently or temporarily, for resting, rearing or breeding. • Couches are above ground resting-up sites and can be very difficult to identify, consisting of an area of flattened grass or earth. • Prints are characteristic and can be found in soft ground and muddy areas; • Spraints are often left in prominent places, for marking, and have a characteristic smell. • Feeding signs include the remains of fish, crabs, amphibians & waterfowl. • Paths are terrestrial routes visible as lines of flattened earth or vegetation. • Slides are worn areas on steep slopes and may be associated with play areas indicated by flattened earth or vegetation.

- Planting Design

  Creating and managing riparian woodlands UK Forestry Standard Practice Guide[4]. The purpose of this Practice Guide is to assist forest and woodland owners, planners and managers, by giving more detailed information on planning, designing and managing riparian woodland to comply with UKFS Requirements and Guidelines. This Guide provides an overview of the benefits of riparian woodland and sets out good practice aimed at mitigating any potentially adverse effects on the freshwater ecosystem. Guidance is provided on planning new riparian woodland, restoring riparian zones within existing conifer forests, and on the management of riparian trees and woodland. It also provides specific sections relating to the management of deadwood, protected species and the control of invasive non-native species in riparian buffer areas. Emphasis is placed on achieving a variable level of riparian woodland cover that is appropriate to local conditions, sensitivities and objectives. The Guide is based on ecological principles and is informed by research results and practical experience.

- Diffuse Pollution Planning

  The Forestry & Water Scotland Initiative[5] publications including 'Know the Rules' brings together new and established resources to help forest owners, managers and practitioners follow good forestry practice to improve water management on their sites. Good water management helps reduce diffuse pollution risks from forestry operations. In turn this benefits the forest environment and wider landscape, helps compliance with water regulations and the UK Forestry Standard, and plays a key part in managing a forest sustainably. The initiative is supported by various organisations involved in Scotland's forestry sector and by the Diffuse Pollution Management Advisory Group (DPMAG), a partnership that focuses on protecting and improving Scotland's water environment by reducing rural diffuse pollution. This resource base was launched in January 2017.

[3] Chanin, P. 2003. Monitoring the Otter (Lutra lutra). Conserving Natura 2000 Rivers Monitoring Series No.10 English Nature, Peterborough

[4] Broadmeadow S, Nisbet T, 2024. Creating and managing riparian woodlands UK Forestry Standard Practice Guide. Forest Research.

[5] Forestry and Water Scotland hosted by Confor. https://www.confor.org.uk/resources/forestry-water-scotland/. Accessed 17 December 2024.

4.2 Feughside Local Nature Conservation Site (LNCS)

4.2.1 The Feughside LNCS has been identified as a sensitive receptor for inclusion in the EIA Report and has therefore been scoped in.

4.2.2 Local nature conservation sites (LNCS) is a non-statutory designation given by local authorities to areas of locally important nature and landscapes.
The Feughside LNCS was put forward by Aberdeenshire Council during the due diligence process in 2023 and agreed for inclusion in the EIA Report. This site represents the best part of a more extensive fluvio-glacial complex together with a variety of fluvial features. Glacial landforms can be seen on a large scale although small scale geology is masked by peat bogs. Glacial drift deposits are thought to have formed during the last Devensian glacial period. Glacial meltwater streams cut a complex network of channels beneath the ice. Features present include melt-water channels, moraines, eskers and kame-terrace deposits. Lateral moraines are well developed on both sides of the valley of the Burn of Greendams, predominantly on elevations below the proposal boundary. The site also includes Clachnaben which is a good example of a granitic tor.
An assessment to extend the LNCS is currently underway with Aberdeenshire Council and the following information has been provided by the local Council Environmental Planner: "Potential extension of Feughside LNCS to include a flush on low ground in Glen Dye to east of Clachnaben which contains lesser bladderwort and small cranberry. Suggested boundary to protect the mire requires protection of the water draining into the area hence inclusion of area uphill from the flush. The proposed boundary, while it does not follow habitat boundaries, follows the watershed in order to preserve the flow and quality of water draining into the wet areas. It was noted that there were historic records of Large heath from the site and data from butterfly transect should be obtained. Lapwing, snipe and curlew present in small numbers." The extension has been approved in principle though official confirmation would not happen until 2028. In the interim this extended area will be considered as a candidate LNCS.

4.2.3 The following information sources were used to identify location and extent:

- **Aberdeenshire Local Development Plan**[6]
- **Aberdeenshire Council communications**

4.2.4 The potential likely effects from afforestation, fencing and roading include:

- **Visibility**: relic glacial and fluvial landforms can be obscured by commercial woodland.
- **Ground Disturbance**: relic glacial and fluvial landforms can be damaged by operations and commercial woodland

4.2.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance of Planting**: Retaining open ground around sensitive areas.
- **Limitation of ground disturbance**: avoidance of some areas from new tracks or ground cultivation

4.2.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Local Development Plan

  This Plan is part of a set of documents which make up the statutory development plan for the area. Our natural environment should ensure that its understanding and enjoyment, as well as its benefits, are secured for present and future generations. These policies aim to deliver protection and enhancement of Aberdeenshire's natural environment and landscape. Development should integrate measures to

[6] Aberdeenshire Council. 2023. Aberdeenshire Local Development Plan: Appendix 12 Local Nature Conservation Sites. https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2023/. Accessed 18 December 2024.

protect and enhance biodiversity and landscape, and contribute to Aberdeenshire being a successful, sustainable, natural place where natural systems are able to recover from the effects of development. The Nature Conservation (Scotland) Act 2004 gives all public organisations a duty to further the conservation of biodiversity. We also support the approach set out in the European Landscape Convention (2000), which encourages sustainable management, protection and improvement of all landscapes. For recognised nature conservation sites (such as Local Nature Conservation Sites, nature reserves, designated wetlands, woodland in the Scottish Natural Heritage Ancient Woodland Inventory and the Native Woodland Survey of Scotland) the proposal's public benefits must clearly outweigh the nature conservation value of the site. In all cases, impacts must be minimised through careful design and mitigation measures.

- Consultation with Aberdeenshire Council

  Focused discussions to assess impacts and appropriate mitigations.
- High Resolution Digital Terrain Models

  Aerial survey using fixed wing aircraft carried out in 2023 producing 20cm resolution digital terrain model as well as 10cm resolution orthomosaic photography of the land ownership.
- Planting design

  Woodland Creation Application Guidance[7] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural prescriptions and environmental, economic, and social factors into a comprehensive plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

[7] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

4.3 Golden Eagle

4.3.1 Golden eagle (*Aquila chrysaetos*) have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.3.2 Between April and July 2022 a breeding raptor survey was carried out at Glen Dye Moor which identified no breeding sites within the project boundary however breeding occurs within the local area and golden eagles were observed hunting within the site boundary. As noted within the breeding bird survey confidential appendices, an analysis of the GET model (indicator of potential golden eagle activity) was carried out resulting in a conclusion that a large proportion of the landscape within the proposed planting boundary is potentially good golden eagle habitat and likely to be utilised by golden eagles. All wild birds in Great Britain are protected under the Wildlife and Countryside Act 1981 (as amended). Further protection is given to some rarer species and to species vulnerable to disturbance and/or persecution. Golden Eagle are listed in both Schedule 1A and Schedule A1.
The golden eagle was put forward by NatureScot, [redacted] and [redacted] and agreed for inclusion in the EIA Report.

4.3.3 The following information sources were used to identify the species:

- **Correspondence with and reports from with** [redacted]
- **Correspondence with NatureScot**
- **Correspondence with and publications[9] from** [redacted]
- **GET Model**
- **Breeding Raptor Survey**

4.3.4 The potential likely effects from afforestation, fencing and roading include:

- **Disturbance**: Noise and visibility of operations within a critical distance of active breeding sites.
- **Prey Species Habitat Change**: Semi-open woodland and montane scrub woodland creation to improve habitat for prey species. Native woodland creation at a density of canopy closure resulting in potential changes to prey species numbers with an additional potential impact of new nesting and roosting locations for eagles.
- **Loss of Foraging Ground**: Areas shown as having a high probability of use in the GET model are lost following establishment of dense conifer plantation.
- **Cumulative Impact**: Neighbouring windfarm approval may have effects to golden eagles which should be considered.

4.3.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Operational Timing Restrictions**: Limiting operations to safe working distances within critical breeding and nesting periods in areas with active territories.
- **Woodland Type and Species Choice**: Corridors of open ground targeted along areas with high likelihood of predicted eagle usage. Low density and variable density woodland of native species is proposed across approximately 71% of the planting area (equivalent to around one third of the enclosed area). These design features are aimed at improving prey community diversity and abundance while also ensuring foraging flight corridors are preserved with good lines of sight. Within 500m of the breeding site, low density planting will be carried out to complement existing tree cover already present. This planting will mimic what would naturally occur over time in the absence of herbivore pressure.

[8] Feilding A. Catalogue of publication history. https://www.alanfielding.co.uk/fielding/index.html. Accessed 18 December 2024.

[9] Rebecca G, Pout A. 2021. "The recent history of Golden Eagles in a North-East Scotland home range". Scottish Birds 14:4. North East Scotland Raptor Study Group.

4.3.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Breeding Raptor Survey

  Searches for breeding raptors were undertaken on the same days as the breeding bird survey visits based on methods set out in Hardey et al. (2013)[10]. A combination of walkover surveys and short vantage point (VP) watches of suitable areas of breeding habitat were undertaken between to detect the presence of target raptor species (including owls). Disused buildings were also searched for the evidence of use by barn owl. Raptor surveys were undertaken under Schedule 1 licence. All surveys commenced before 8am (following completion of black grouse surveys in April and May) and lasted for up to eight hours. Weather conditions were logged at hourly intervals. Full details of survey timings and hourly weather conditions are provided in Appendix 1.

- Approaches as proposed by [redacted]
  - Identify the assumed territory on the basis of a single pair occupancy using current research estimates of 11,800ha
  - Determine the total area of 'open' 6+ GET total, this excludes all existing closed canopy forest and 500m buffer from turbines
  - Consider other factors such as constrained territories, prey abundance, positive impacts from land use change or habitat diversification
  - Quantify our proposals in terms of closed canopy woodland proposed, this will exclude low density, semi-open canopy, natural regeneration, native upland birch at 1600 trees per hectare, and possibly native pine woodland mixed with broadleaves.
  - From this a total loss estimate can be assumed and resulting % loss compared against current standards of what is 'significant'

- Cumulative Assessment

  Potentially compounding effects from other projects are important to consider. Information from relevant nearby projects will be secured in order to quantify potential cumulative effects. This may include site details from other statutory approvals, previous or ongoing survey work, or other development proposals.

- GET model[11]

  NatureScot have advised that "from now on, in cases where modelling is necessary for the assessment of the impacts of forestry or wind farm proposals on golden eagles, GET model assessment is recommended to support Environmental Impact Assessment Reports." [12]

[10] Hardey, J., Crick, H., Wernham, C., Riley, H., Etheridge, B. & Thompson, D. (2013). Raptors: a field guide to survey and monitoring (3rd Edition)

[11] Fielding, A.H., Haworth, P.F., Anderson, D., Benn, S., Dennis, R., Weston, E. and Whitfield, D.P. (2020), A simple topographical model to predict Golden Eagle Aquila chrysaetos space use during dispersal. Ibis, 162: 400-415. https://doi.org/10.1111/ibi.12718.

[12] NatureScot. NatureScot statement on modelling to support the assessment of forestry and wind farm impacts on golden eagles. https://www.nature.scot/doc/naturescot-statement-modelling-support-assessment-forestry-and-wind-farm-impacts-golden-eagles. Accessed 18December 2024.

4.4 Merlin

4.4.1 Merlin (*Falco columbarius*) have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.4.2 Three active merlin territories were identified in 2021 with one confirmed to have successfully fledged three young. Additional territories are known on site from previous annual survey efforts covering the period 2015-2020. A longer-term study of this local population of merlin also suggests the area is relatively well used though population declines are noted. Taking a precautionary approach, all territories active within the last five years have been considered for assessment. Detailed discussion with [redacted], local merlin expert and long-term researcher of the southeast Aberdeenshire merlin populations, also aided in assessment of these territories and levels of sensitivity. All wild birds in Great Britain are protected under the Wildlife and Countryside Act 1981 (as amended). Further protection is given to some rarer species and to species vulnerable to disturbance and/or persecution. Merlin is listed as a Schedule 1 species.
Merlin was put forward by [redacted] and agreed for inclusion in the EIA Report.

4.4.3 The following information sources were used to identify species:

- **Correspondence, meetings, historic datasets and publications[13] from** [redacted]
- **Breeding Raptor Survey**

4.4.4 The potential likely effects from afforestation, fencing and roading include:

- **Disturbance**: Noise and visibility of operations within a critical distance of active breeding sites.
- **Loss of breeding sites**: Afforestation resulting in unsuitable habitat types for breeding/nesting.
- **Cumulative Impact**: Neighbouring windfarm approval may have effects to merlin which should be considered.

4.4.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Operational Timing Restrictions**: Limiting operations to safe working distances within critical breeding and nesting periods in areas with active territories.
- **Woodland Type and Species Choice**: The preferred habitat for Merlin can be described as open-ness where there is an abundance and availability of prey. Given presence of high-quality hunting areas they have been known to nest on the edge of forests, in small clumps of trees and among tall vegetation. Design features which are understood to generate a high-quality environment are: scattered riparian planting as it encourages important prey, low-density woodland edges with interspersed native broadleaves and open unplanted plateau habitats. In addition, it is crucial to establish a potential nesting area and buffer of around 100 ha, that should be free from planting or burning - this is to ensure future suitable deep vegetation for merlin nesting-sites.[14]
- **Monitoring**: Long-term monitoring to facilitate future research related to afforestation.

4.4.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Breeding Raptor Survey

[13] Rebecca G., Cosnette B., Steele L., Duncan A., Pout A. & Ruthven G. (2022). Occupancy and productivity at Merlin breeding areas in North-east Scotland in relation to land use: implications of conservation management. *British Birds*. Vol.115 121-180.
[14] Per comms. with Dr Graham Rebecca 15 September 2023.

Searches for breeding raptors were undertaken on the same days as the breeding bird survey visits based on methods set out in Hardey et al. (2013)[15]. A combination of walkover surveys and short vantage point (VP) watches of suitable areas of breeding habitat were undertaken between to detect the presence of target raptor species (including owls). Disused buildings were also searched for the evidence of use by barn owl. Raptor surveys were undertaken under Schedule 1 licence. All surveys commenced before 8am (following completion of black grouse surveys in April and May) and lasted for up to eight hours. Weather conditions were logged at hourly intervals. Full details of survey timings and hourly weather conditions are provided in Appendix 1.

- Planting design

  Woodland Creation Application Guidance[16] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural prescriptions and environmental, economic, and social factors into a comprehensive plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

- Engagement with [redacted]

  Focused consultation to consider afforestation design and assess level of impact.

- Cumulative Assessment

  Potentially compounding effects from other projects are important to consider. Information from relevant nearby projects will be secured in order to quantify potential cumulative effects. This may include site details from other statutory approvals, previous or ongoing survey work, or other development proposals.

[15] Hardey, J., Crick, H., Wernham, C., Riley, H., Etheridge, B. & Thompson, D. (2013). Raptors: a field guide to survey and monitoring (3rd Edition)

[16] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

4.5 Curlew

4.5.1 Curlew (*Numenius arquata*) have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.5.2 Between April and July 2022 a breeding bird survey was carried out at Glen Dye Moor which identified a number of breeding sites within the project boundary. The scale and density of the territories suggested that the local curlew pairs may be important for the regional breeding population. All wild birds in Scotland are given protection under the Wildlife and Countryside Act 1981 (as amended).
The curlew was put forward by RSPB and agreed for inclusion in the EIA Report.

4.5.3 The following information sources were used to identify the species:

- **Correspondence with RSPB**
- **Correspondence with NatureScot**
- **Correspondence with** [redacted]
- **Breeding Bird Survey**

4.5.4 The potential likely effects from afforestation, fencing and roading include:

- **Disturbance**: Noise and visibility of operations within a critical distance of active breeding sites.
- **Loss of breeding sites**: Afforestation resulting in unsuitable habitat types for breeding/nesting.
- **Cumulative Impact**: Neighbouring windfarm approval may have effects on curlew or other displacement related issues which should be considered.

4.5.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Operational Timing Restrictions**: Limiting operations to safe working distances within critical breeding and nesting periods in areas with active territories.
- **Woodland Type and Species Choice**: Connected open corridors within a woodland mosaic leaving a variable area of unplanted ground in or around breeding territories. Incorporating natural regeneration, semi-open upland birch, and mixed native Scots pine and birch has potential to reduce impacts to breeding pairs. Planting of dense conifer will be reduced as much as feasible and limited to a minimum number of territories.
- **Alternative Habitat**: Within the whole scheme, suitable alternative habitat is available for the population levels currently seen and as restoration activities within peatland areas continue, areas of alternative habitat will improve in condition and quality. There is future habitat potential for the population to expand should the current ongoing trend of decline be reversed.
- **Monitoring**: Planned long-term data gathering activities to help inform future proposals for woodland creation and allow a more accurate post-establishment assessment of the impacts of this change in land use on wader populations.

4.5.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Breeding bird Survey

  A four-visit breeding wader survey was completed between April and July 2022 to identify breeding bird territories within the survey area, which comprised all accessible land within the site and extended to an additional 500m for waders. Breeding bird survey methods were based on the Brown and Shepherd method.[17] The surveyors walked predetermined routes ensuring that all points within the

[17] A. F. Brown & K. B. Shepherd (1993) A method for censusing upland breeding waders, Bird Study, 40:3, 189-195, DOI

survey area were approached to within 100m. 20-25 minutes were spent surveying each 500 m × 500 m of the survey area. Up to four surveys were used to cover the site, each spending a minimum of four days per each of the four survey visits. All birds seen and heard were recorded on large-scale maps using standard BTO species codes and symbology to denote behaviour[18], particularly where this related to breeding (e.g. singing, alarm calling, gathering nest material or food, feeding newly fledged young, etc.). If a singing or displaying bird was recorded at a particular location within the survey area on at least one of the two visits, it was assumed to be holding a territory and/or breeding.

- Assessment Following Scottish Forestry Guidelines 'Woodland Creation and Curlew'[19]

  The best way to avoid significant impacts from woodland creation is through good forest design and forward planning, which is then carried through to establishment and management. Woodland creation proposals should be designed to protect and enhance important nesting sites through appropriate mitigation.

  - Identify and protect important breeding sites
  - Desk assessment
  - Early engagement
  - Breeding Bird Survey
  - Mitigation
- Engagement with RSPB

  Focused consultation to consider afforestation design and assess level of impact.
- Cumulative Assessment

  Potentially compounding effects from other projects are important to consider. Information from relevant nearby projects will be secured in order to quantify potential cumulative effects. This may include site details from other statutory approvals, previous or ongoing survey work, or other development proposals.

[18] Gilbert, G., Gibbons, D.W. & Evans, J. (1998) Bird Monitoring Methods. RSPB.

[19] Scottish Forestry. 2021. Woodland Creation and Curlew: Curlew Information Sheet. https://www.forestry.gov.scot/publications/713-woodland-creation-and-curlew. Accessed 19 December 2024.

4.6 Waders (Other Species)

4.6.1 Waders have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.6.2 Between April and July 2022 a breeding bird survey was carried out at Glen Dye Moor which identified a number of wader breeding sites. All wild birds in Scotland are given protection under the Wildlife and Countryside Act 1981 (as amended).

- Two lapwing (*Vanellus vanellus*) territories were recorded within the survey area, both in the Water of Dye valley.
- 12 pairs of golden plover (*Pluvialis apricaria)* were recorded during the 2022 field survey.
- The three remaining breeding wader species present within the survey area, Oystercatcher (*Haematopus ostralegus)*, common sandpiper (*Actitis hypoleucos)* and snipe (*Gallinago gallinago)* are considered to be relatively tolerant of disturbance and are not included for further assessment.

4.6.3 The following information sources were used to identify the species to be included in the EIA Report:

- **Correspondence with RSPB**
- **Breeding Bird Survey**

4.6.4 The potential likely effects from afforestation, fencing and roading include:

- **Disturbance**: Noise and visibility of operations within a critical distance of active breeding sites.
- **Loss of breeding sites**: Afforestation resulting in unsuitable habitat types for breeding/nesting.
- **Cumulative Impact**: Neighbouring windfarm approval may have effects on waders or other displacement related issues which should be considered.

4.6.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Operational Timing Restrictions**: Limiting operations to safe working distances within critical breeding and nesting periods in areas with active territories.
- **Woodland Type and Species Choice**: Connected open corridors within a woodland mosaic leaving a variable area of unplanted ground in or around breeding territories. Incorporating natural regeneration, semi-open upland birch, and mixed native Scots pine and birch has potential to improve conditions for breeding pairs. Planting of dense conifer will be reduced as much as feasible and limited to a minimum number of territories.

4.6.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Breeding bird Survey

  A four-visit breeding wader survey was completed between April and July 2022 to identify breeding bird territories within the survey area, which comprised all accessible land within the site and extended to an additional 500m for waders. Breeding bird survey methods were based on the Brown and Shepherd method.[20] The surveyors walked predetermined routes ensuring that all points within the survey area were approached to within 100m. 20-25 minutes were spent surveying each 500 m × 500 m of the survey area. Up to four surveys were used to cover the site, each spending a minimum of four days per each of the four survey visits. All birds seen and heard were recorded on large-scale maps using standard BTO

[20] A. F. Brown & K. B. Shepherd (1993) A method for censusing upland breeding waders, Bird Study, 40:3, 189-195, DOI

species codes and symbology to denote behaviour[21], particularly where this related to breeding (e.g. singing, alarm calling, gathering nest material or food, feeding newly fledged young, etc.). If a singing or displaying bird was recorded at a particular location within the survey area on at least one of the two visits, it was assumed to be holding a territory and/or breeding.

- Engagement with RSPB

  Focused consultation to consider afforestation design and assess level of impact.

- Cumulative Assessment

  Potentially compounding effects from other projects are important to consider. Information from relevant nearby projects will be secured in order to quantify potential cumulative effects. This may include site details from other statutory approvals, previous or ongoing survey work, or other development proposals.

[21] Gilbert, G., Gibbons, D.W. & Evans, J. (1998) Bird Monitoring Methods. RSPB.

4.7 Black Grouse

4.7.1 Black Grouse (*Tetrao tetrix*) have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.7.2 Between April and July 2022 a breeding bird survey was carried out at Glen Dye Moor which identified seven lek sites within the project area, ranging between one and 24 males and cumulatively totalling 47 males. Another four lek sites were noted on neighbouring property within 2km of the proposal boundary. All wild birds in Scotland are given protection under the Wildlife and Countryside Act 1981 (as amended).

4.7.3 The following information sources were used to identify the species:

- **Correspondence with RSPB**
- **Correspondence with NatureScot**
- **Breeding Bird Survey**

4.7.4 The potential likely effects from afforestation, fencing and roading include:

- **Disturbance**: Noise and visibility of operations within a critical distance of active breeding sites.
- **Loss of breeding sites**: Afforestation resulting in unsuitable habitat types for breeding/nesting.
- **Cumulative Impact**: Neighbouring windfarm approval may have effects on black grouse or other displacement related issues which should be considered.

4.7.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Operational Timing Restrictions**: Limiting operations to safe working distances within critical breeding and nesting periods in areas with active territories.
- **Woodland Type and Species Choice**: Connected open corridors within a woodland mosaic leaving a variable area of unplanted ground in or around breeding territories. Incorporating natural regeneration, semi-open upland birch, and mixed native Scots pine and birch has potential to improve conditions for breeding pairs. Planting of dense conifer will be reduced as much as feasible and limited to a minimum number of territories.

4.7.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Breeding bird Survey

  A four-visit breeding wader survey was completed between April and July 2022 to identify breeding bird territories within the survey area, which comprised all accessible land within the site and extended to an additional 500m for waders. Breeding bird survey methods were based on the Brown and Shepherd method.[22] The surveyors walked predetermined routes ensuring that all points within the survey area were approached to within 100m. 20-25 minutes were spent surveying each 500 m × 500 m of the survey area. Up to four surveys were used to cover the site, each spending a minimum of four days per each of the four survey visits. All birds seen and heard were recorded on large-scale maps using standard BTO species codes and symbology to denote behaviour[23], particularly where this related to breeding (e.g. singing, alarm calling, gathering nest material or food, feeding newly fledged young, etc.). If a singing or displaying bird was recorded at a particular

[22] A. F. Brown & K. B. Shepherd (1993) A method for censusing upland breeding waders, Bird Study, 40:3, 189-195, DOI

[23] Gilbert, G., Gibbons, D.W. & Evans, J. (1998) Bird Monitoring Methods. RSPB.

location within the survey area on at least one of the two visits, it was assumed to be holding a territory and/or breeding.

- Cumulative Assessment

  Potentially compounding effects from other projects are important to consider. Information from relevant nearby projects will be secured in order to quantify potential cumulative effects. This may include site details from other statutory approvals, previous or ongoing survey work, or other development proposals.

- Engagement with RSPB

  Focused consultation to consider afforestation design and assess level of impact.

- Assessment Following Scottish Forestry Guidelines 'Action for Black Grouse' [24]

  The black grouse is one of the most rapidly declining bird species in the UK and is a UK priority species. It needs a mosaic of woodland and moorland areas and edges, and conservation action needs to be planned at a landscape scale. The Black Grouse Species Action Frameworkplan2007-2012, published by Scottish Natural Heritage (SNH), summarises actions for black grouse across Scotland, including action in moorland areas. This note explains in more depth how Forestry Commission Scotland will contribute to this overall effort.

[24] Forestry Commission Scotland. 2008 'Delivery: Action for Black Grouse' Forestry Commission Scotland.

4.8 Priority Flora

4.8.1 Priority flora have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.8.2 A due diligence survey (2022–2024) and consultation process, including input from the Botanical Society of Britain and Northern Ireland (BSBI), identified rare and scarce plant species both within and near the project boundary, with potential for cross-boundary effects.

4.8.2.1 The table below lists the plants put forward by BSBI and agreed for inclusion in the EIA Report.

Species	**Local/Regional/National Significance**
Lycopodium annotinum	Local
Vaccinium microcarpum	National
Dactylorhiza incarnata	Regional
Utricularia minor	Regional
Carex pauciflora	Regional
Selaginella selaginoides	Regional
Cornus suecica	National
Epilobium anagallidifolium	Regional
*Micranthes stellaris [*previously *Saxifraga stellaris]*	Regional
Festuca vivipara	Regional
Carex dioica	Local
Empetrum nigrum subsp. *Hermaphroditum*	Regional
Genista anglica	National
Arctostaphylos uva-ursi	Regional
Carex bigelowii	Regional
Carex bigelowii x nigra = C. x decolorans	Regional
Diphasiastrum alpinum	Regional
Eleocharis multicaulis	Local
Eleocharis quinqueflora	Local
Euphrasia arctica	National
Euphrasia micrantha	National
Hieracium argenteum	Regional
Linnaea borealis	National
Melampyrum pratense	Regional
Meum athamanticum	National
Omalotheca sylvatica	National
Pyrola media	National
Salix myrsinifolia	Local
Sparganium natans	Local
Spergula arvensis	National

4.8.3 The following information sources were used to identify species:

- **Correspondence with BSBI**
- [redacted] **NVC Field Survey**
- **NBN Atlas and NESBReC Datasets**

4.8.4 The potential likely effects from afforestation, fencing and roading include:

- **Tree Seeding**: Spread of tree species into open ground over time.
- **Shading**: Reduced light availability impacting priority plant growth.
- **Hydrological Change**: Changes to local water tables due to afforestation and road construction including cross-boundary impacts.
- **Ground Disturbance**: Impacts to soil and vegetation from ground preparation, fencing, and infrastructure works

4.8.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance of Planting**: Retaining open ground around sensitive areas.
- **Species Choice**: No planting of productive conifer species within 20m of Groundwater Dependent Terrestrial Ecosystems (GWDTE).
- **Monitoring**: Long-term monitoring to identify and address threats related to tree seeding.

4.8.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- NVC survey (baseline conditions)

  The National Vegetation Classification (NVC) is necessary for identifying habitats/plant communities of relevance to modern legislation (such as Annex I of the Habitats Directive, or GWDTE of the Water Framework Directive). It is therefore the primary system to which vegetation (& habitat) is related within this report, for the purposes of identification, description & mapping. Vegetation is identified, mapped & described according to the five volumes of British Plant Communities[25] in accordance with the standard NVC method (as outlined in the NVC Users Handbook[26]). This involves walking the site on a route determined by topography/viewpoints and the need to sample distinctive areas. Homogenous areas are mapped onto rectified aerial photographs overlain with contours & other physical features to ensure accuracy. A single vegetation community or mosaic of more may be mapped, depending upon the scale and patterning of the vegetation. Where mosaics are mapped, the percentage cover of each NVC community is stated in the mapping. Characteristics of the vegetation and point-features too small to otherwise map are recorded as 'Target Notes'. These and the habitat & vegetation descriptions include lists of characteristic species that are semi-quantified using the DAFOR scale[27]. Notable species are those that are subject to nature conservation designation. The 2016 JNCC spreadsheet of taxa designations[28] defines these species and is used as the main point of reference in addition to the Tayside Biodiversity Action Plan[29].

- Planting design

  Woodland Creation Application Guidance[30] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural prescriptions and environmental, economic, and social factors into a comprehensive

[25] Rodwell, J.S. 1991-2000. British plant communities. 5 Volumes. Cambridge University Press

[26] Rodwell, J.S. 2006. NVC Users' Handbook. Available at http://jncc.defra.gov.uk/page-3724. Accessed 24/10/2022.

[27] DAFOR scale: Dominant > Abundant > Frequent > Occasional > Rare.

[28] JNCC spreadsheet of taxa designations & further information available at: http://jncc.defra.gov.uk/page-3408. Accessed 24/10/2022.

[29] North East Scotland Biodiversity Partnership biodiversity information for developers available at https://www.nesbiodiversity.org.uk/biodiversityinformation-for-developers/. Accessed 24/10/2022.

[30] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

- Guidance on hydrologic effects of forestry

  The 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals'[31] intends to help forest managers in identifying Groundwater Dependent Terrestrial Ecosystems (GWDTE) and assessing the risk of woodland creation operations to them and their related groundwater flows.

[31] Confor, FCS, SNH, SEPA Working Group. 2018. Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals.

4.9 Large Heath Butterfly

4.9.1 Large heath butterfly have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.9.2 A due diligence consultation process, including input from the Butterfly Conservation Scotland (BCS) identified large heath butterfly within the project boundary. Locations of large heath butterflies occurred within a single transect area as indicated by BCS national monitoring records suggesting an isolated colony. It was noted that the national monitoring coverage was restricted to limited grid squares resulting in an incomplete record for the species. Following focused consultation with Butterfly Conservation Scotland and joint field assessments the design was modified to ensure risk to the colony was reduced to the greatest extent feasible.

4.9.3 The following information sources were used to identify species:

- **Correspondence with BCS**
- **BCS datasets (national surveys 2018-2022)**

4.9.4 The potential likely effects from afforestation, fencing and roading include:

- **Tree Seeding**: Spread of tree species into open ground over time.
- **Habitat Change**: Changes to local water tables due to afforestation and road construction resulting in drying and habitat changes.
- **Isolation**: Afforestation resulting in enclosure of the colony, limiting future dispersion to suitable habitats.
- **Disturbance/damage:** Resulting from machine movements through occupied suitable habitat

4.9.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance of Planting**: Retaining open ground in known occupied habitats.
- **Species Choice**: No planting of productive conifer species within 20m of Groundwater Dependent Terrestrial Ecosystems (GWDTE).
- **Connected Corridors**: Ensuring areas of suitable habitat remain connected with open corridors to enable dispersion of the colony.
- **Monitoring**: Long-term monitoring to identify and address threats related to tree seeding. Ongoing surveys to determine extent and spread of large heath butterfly on site.

4.9.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- NVC survey (baseline conditions)

  The National Vegetation Classification (NVC) is necessary for identifying habitats/plant communities of relevance to modern legislation (such as Annex I of the Habitats Directive, or GWDTE of the Water Framework Directive). It is therefore the primary system to which vegetation (& habitat) is related within this report, for the purposes of identification, description & mapping. Vegetation is identified, mapped & described according to the five volumes of British Plant Communities[32] in accordance with the standard NVC method (as outlined in the NVC Users Handbook[33]). This involves walking the site on a route determined by topography/viewpoints and the need to sample distinctive areas. Homogenous areas are mapped onto rectified aerial photographs overlain with contours & other

[32] Rodwell, J.S. 1991-2000. British plant communities. 5 Volumes. Cambridge University Press

[33] Rodwell, J.S. 2006. NVC Users' Handbook. Available at http://jncc.defra.gov.uk/page-3724. Accessed 24/10/2022.

physical features to ensure accuracy. A single vegetation community or mosaic of more may be mapped, depending upon the scale and patterning of the vegetation. Where mosaics are mapped, the percentage cover of each NVC community is stated in the mapping. Characteristics of the vegetation and point-features too small to otherwise map are recorded as 'Target Notes'. These and the habitat & vegetation descriptions include lists of characteristic species that are semi-quantified using the DAFOR scale[34]. Notable species are those that are subject to nature conservation designation. The 2016 JNCC spreadsheet of taxa designations[35] defines these species and is used as the main point of reference in addition to the Tayside Biodiversity Action Plan[36].

- Planting design

  Woodland Creation Application Guidance[37] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural prescriptions and environmental, economic, and social factors into a comprehensive plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

- Guidance on hydrologic effects of forestry

  The 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals'[38] intends to help forest managers in identifying Groundwater Dependent Terrestrial Ecosystems (GWDTE) and assessing the risk of woodland creation operations to them and their related groundwater flows.

- Large Heath Butterfly information published by BCS[39], UK Butterflies, and the British Entomological and Natural History Society[40].

  These resources identify key habitat characteristics used by large heath butterfly.

[34] DAFOR scale: Dominant > Abundant > Frequent > Occasional > Rare.

[35] JNCC spreadsheet of taxa designations & further information available at: http://jncc.defra.gov.uk/page-3408. Accessed 24/10/2022.

[36] North East Scotland Biodiversity Partnership biodiversity information for developers available at https://www.nesbiodiversity.org.uk/biodiversityinformation-for-developers/. Accessed 24/10/2022.

[37] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

[38] Confor, FCS, SNH, SEPA Working Group. 2018. Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals.

[39] Wainwright D., Ellis S., Hunter M., Hutt D. and Pugh P.(n.d.). Large Heath *Coenonympha tullia*. Butterfly Conervation. https://butterfly-conservation.org/sites/default/files/large-heath-psf.pdf (Accessed 17 December 2024)

[40] Osborne A. & Coulthard E. (2022) Early dispersion and colony formation of the large heath butterfly *Coenonympha Tullia ssp*. *Davus* following a species reintroduction onto Chat Moss, Manchester, UK. *British Entomological and Natural History Society, 35. pp. 81-90*. https://e-space.mmu.ac.uk/629986/ (Accessed 17 December 2024)

4.10 Recreation

4.10.1 Recreational impact has been identified as a sensitive receptor for inclusion in the EIA Report and has therefore been scoped in.

4.10.2 Whilst there are no core paths or rights of way, Glen Dye Moor is a popular area for recreational users such as hillwalkers, cyclists and horse riders. Charr Bothy, under lease by Mountain Bothies Association, is open to the public and there is a local rifle range available to community groups by request. A car park is provided at the main entrance near Spital Bridge. The pre-application consultation and on-going stakeholder engagement has identified many user groups of the site. The Land Reform (Scotland) Act 2003 creates a statutory framework for the provision and management of access in Scotland. This legislation enables people to pursue recreational, educational and certain commercial use of the countryside, provided they do so responsibly, and covers a range of non-motorised activities such as walking, cycling and horse riding. Responsibilities for land managers and recreational users are set out in the Scottish Outdoor Access Code. The Health and Safety at Work Act 1974 places a duty on land managers to conduct activities so that public is not exposed to risks caused by their operations.

4.10.3 The following information sources were used to identify current recreational locations and types:

- **Desktop analysis of Aberdeenshire Council core path network and OS mapping to establish marked and known tracks and paths.**
- **Consultation with recreational users through pre-application consultation and on-going stakeholder engagement.**
- **Use of Strava heatmaps to capture further usage not captured in analysis of OS mapping and consultation process.**

4.10.4 The potential likely effects from afforestation, fencing and roading include:

- **Physical barriers to access:** new deer fencing creating physical barriers to all, or certain groups (e.g. horse access), of users at access points onto site.
- **Loss of access through physical damage:** Trails and paths being lost through direct planting of trees, or trails and paths being physically damaged through operations. This may include loss through lack of maintenance to infrastructure.
- **New or improved access:** Positive effects due to the removal of existing barriers, improvement of facilities and creation of new roads.

4.10.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance:** No planting over trails and paths.
- **Access provision:** Use of non-vehicular multi-user access gates where physical barriers exist or are created. Use of signage to maintain welcoming environment. New roads. Facilitation to users such as Duke of Edinburgh groups. Car park provision. Maintenance of footpaths.
- **Operational planning:** Operational mitigation measures such as risk assessments. The creation of an access management plan where appropriate and identified in risk assessment to reduce risks to paths/tracks and the public.

4.10.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Proposal Design alignment with Scottish Outdoor Access Code[41]

[41] NatureScot. https://www.outdooraccess-scotland.scot/access-management-guidance/path-management. Accessed 20 December 2024.

The ‘Scottish Outdoor Access Code’ provides information and guidance for land managers about statutory access rights and responsibilities. It also provides non-statutory guidance on access management during land management operations as well as guideline for signage, car parks, and upland path management. Afforestation, fencing and roading design assessment to ensure identified access routes will not be blocked, restricted or lost. This will include consultation with Aberdeenshire Council Local Access Officer.

- Managing woodland access and forest operations in Scotland

  Forestry Commission Scotland Practice Note [42] ‘Managing woodland access and forest operations in Scotland’ provides guidance on managing access in a pragmatic and practical manner to ensure that forest operations can take place smoothly and safely, with minimal disturbance to public access. It is specifically intended to help guide decision makers in situations where forestry operations such as harvesting and site preparation may have impacts on visitors and recreational users.

[42] Forestry Commission Scotland. 2013. Managing Woodland Access and Forest Operations in Scotland: Practice Note 104. https://www.forestry.gov.scot/publications/352-managing-woodland-access-and-forest-operations-in-scotland. Accessed 20 Dec 2024.

4.11 Deer Management

4.11.1 Deer Management has been identified as a sensitive receptor for inclusion in the EIA Report and has therefore been scoped in.

4.11.2 Deer management is required to reduce and maintain deer numbers to a level to ensure successful tree establishment. Glen Dye Moor falls out with any formally constituted deer management group. The property falls within what is recognised as the East Grampians deer range. Deer numbers across this range have been assessed by NatureScot in their deer count in March 2022, showing an average density of 11 deer per square kilometre. Glen Dye (Hill Ground) was assessed at 6 deer per square kilometre. It has been identified that deer tend to prefer holding to the south-west of Glen Dye Moor rather than on Glen Dye Moor itself. However, they are not restricted and freely move to other areas.

4.11.2.1 Note on Fencing: The proposal includes deer fencing as a protection measure to aid tree establishment. The potential environmental effect, impact and mitigation will be assessed within the EIA Report under the relevant environmental receptors such as black grouse, landscape and cultural heritage. The EIA Report will include a 'no deer fencing' option as part of the assessment of alternatives.

4.11.3 The following information sources were used:

- **NatureScot Deer Count Data**
- **Correspondence with NatureScot**

4.11.4 The potential likely effects from afforestation, fencing and roading include:

- **Habitat loss**: new fencing will exclude deer from foraging areas
- **Entrapment**: Deer will remain resident within the enclosure
- **Change to immigration/emigration**: Changes to local deer dispersion to and from neighbouring properties
- **Habitat change**: lowering of browsing pressure positively impacting sensitive habitats and species

4.11.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Fencing**: design and extent of fencing
- **Compensatory cull**: new fencing will require culling to compensate for habitat loss
- **Management cull**: Deer levels within the enclosure will be managed to low levels
- **Monitoring**: Long-term monitoring to identify and address threats related to tree seeding.

4.11.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Deer Management Plan
  This plan will include current deer numbers, deer management objectives, annual cull targets, record keeping requirements, deer damage assessment methodology and deer management plan review requirements.
- Consultation with NatureScot
  Focused discussion with the local Deer Officer to determine suitability of the Deer Management Plan. It was noted at the EIA Scoping Meeting that a deer management plan has been produced as part of the due-diligence and screening stages, NatureScot has seen this plan and is satisfied with the content.

4.12 Archaeology, Including the Cairn o'Mount Scheduled Ancient Monument (SAM)

4.12.1 Archaeology and cultural heritage have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.12.2 GUARD Archaeology Limited undertook an archaeological desk-based assessment and walkover survey of the proposal area in June 2022. The aims of the study were to assess evidence for the past human use of the area, its archaeological sensitivity, and the potential impact of any afforestation and peatland restoration upon the archaeological resource. The archaeological assessment found that there are 17 known cultural heritage sites within the area. A further nine cultural heritage sites, including one nationally significant Scheduled Monument. Six previously unrecorded cultural heritage sites of lesser cultural heritage significance were located during the walkover survey. The variety of sites identified during the survey include two hut circles, three aircraft wreck sites, a well, seven townships with and without associated rig and furrow, three parish boundary markers, a military road, the locations of a prehistoric stone axe head, an arrowhead, a stone structure, two wooden structures, a ruined sheep pen and a longhouse.

Correspondence with Aberdeenshire Council Archaeological Services also identified additional detail relating to extent of sites, recommendations for enhanced mitigation and provided detailed pre-screening assessment of proposals for a new forest road through the site including assessment of alternative road locations.

Correspondence with Historic Environment Scotland related to the Scheduled Ancient Monument (SAM) at Cairn o'Mount also occurred providing input on potential impacts.

The statutory framework for heritage in Scotland is outlined in the Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Listed Buildings and Conservation Areas) (Scotland) Act, and The Ancient Monuments and Archaeological Areas Act 1979, both of which are modified by the Historic Environment (Amendment) (Scotland) Act (2011).

4.12.3 The following information sources were used to identify the issue:

- **Historic Environment Records**
- **Archaeological Desk-based and Field Assessment**
- **Correspondence with Aberdeenshire Council Archaeological Services**
- **Correspondence with Historic Environment Scotland**
- **High Resolution Aerial Photographic Survey and Digital Terrain Model**

4.12.4 The potential likely effects from afforestation, fencing and roading include:

- **Woodland Establishment**: Both planted and naturally regenerating trees can obscure the visibility of the features including views to and from the SAM, rooting can damage features over time, both surface and subsurface features may be impacted.
- **Ground Disturbance**: Impacts to soil and vegetation from ground preparation, fencing, and infrastructure works

4.12.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance of Planting**: Retaining open ground around sensitive areas.
- **Inter-visibility**: Interconnectivity of open corridors around archaeological features is also in place where this enhances user experience and understanding of the cultural setting. Further unplanted open areas and corridors around archaeological sites have been linked with other sensitivities such as breeding birds or landscape viewpoints to further enhance the site.
- **Monitoring**: Long-term monitoring to identify and address threats related to tree seeding.

4.12.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Archaeological Walkover Survey
  The assessment examined the area proposed for woodland creation and a radius of approximately 100 m beyond its boundary (the buffer zone). Study of the surrounding landscape was necessary to establish the local archaeological and historical context, in order to provide a broader understanding of the historical development of the area and the potential for as-yet-unidentified archaeological remains within that area. A walkover survey of the area proposed for woodland creation was carried out from 16th to 20th May 2022 in mostly dry and sunny weather conditions. The locations of all of the cultural heritage sites within the Site were visited, photographed and their condition noted.
- Alternatives Assessment
  Assessment of alternatives for road building through archaeological features.
- Scheduled Ancient Monument in relation to LVIA
  Completion of a Landscape Visual Impact Assessment and consultation with a competent and qualified individual to assess the SAM impacts of fence line placement.
- Correspondence with the Highland Council and Historic Environment Scotland
  Consideration by the statutory bodies in assessing suitability of mitigation and proposals.

4.13 Soils, Including Ground Cultivation

4.13.1 Soils and ground cultivation have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.13.2 A due diligence survey (2022) identified organic and mineral soils within the project boundary. Soils at Glen Dye Moor include well-drained podzols in the valleys and lower-lying areas, transitioning to more organic soils with increasing altitude. Significant areas of blanket peat are present.

4.13.3 The following information sources were used to identify sensitive soils:

- [redacted]**NVC Field Survey and Deep Peat Survey**
- **High Resolution Aerial Photographic Survey and Digital Terrain Model**
- **The Soil Survey of Scotland Maps**[43]
- **Soil pits and core sampling**
- **Supplemental peat depth transects**

4.13.4 The potential likely effects from afforestation, fencing and roading include:

- **Carbon Balance:** Release of stored carbon through soil disturbance from cultivation and habitat change
- **Diffuse Pollution:** Resulting from sediment run-off following soil disturbance.
- **Ground Disturbance**: Impacts to soil and vegetation from ground preparation, fencing, and infrastructure works

4.13.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance of Planting**: No planting will occur on deep peat (peat >50cm).
- **Species Choice**: Published best practice on matching soil types and objective to cultivation techniques, taking into account soil carbon implications, buffers to watercourses and minimising diffuse pollution.
- **Diffuse Pollution Planning**: During the planning stage of operations an assessment of diffuse pollution risk and instructions for prevention techniques will be carried out and form part of contract materials.
- **Emergency Planning**: Ensuring all operational contract include emergency response plans and prevention techniques to reduce risk of pollution.

4.13.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Survey (baseline conditions), NVC, peat depth and soil sampling

  The National Vegetation Classification (NVC) is necessary for identifying habitats/plant communities of relevance to modern legislation (such as Annex I of the Habitats Directive, or GWDTE of the Water Framework Directive). It is therefore the primary system to which vegetation (& habitat) is related within this report, for the purposes of identification, description & mapping. Vegetation is identified, mapped & described according to the five volumes of British Plant Communities[44] in accordance with the standard NVC method (as outlined in the NVC Users Handbook[45]). This involves walking the site on a route determined by

[43] Soil Survey of Scotland Staff (1970-1987). Soil maps of Scotland (partial coverage). Digital version 10 release. James Hutton Institute, Aberdeen. DOI 10.5281/zenodo. 6908156

[44] Rodwell, J.S. 1991-2000. British plant communities. 5 Volumes. Cambridge University Press

[45] Rodwell, J.S. 2006. NVC Users' Handbook. Available at http://jncc.defra.gov.uk/page-3724. Accessed 24/10/2022.

topography/viewpoints and the need to sample distinctive areas. Homogenous areas are mapped onto rectified aerial photographs overlain with contours & other physical features to ensure accuracy. A single vegetation community or mosaic of more may be mapped, depending upon the scale and patterning of the vegetation. Where mosaics are mapped, the percentage cover of each NVC community is stated in the mapping. Characteristics of the vegetation and point-features too small to otherwise map are recorded as 'Target Notes'. These and the habitat & vegetation descriptions include lists of characteristic species that are semi-quantified using the DAFOR scale[46]. Notable species are those that are subject to nature conservation designation. The 2016 JNCC spreadsheet of taxa designations[47] defines these species and is used as the main point of reference in addition to the Tayside Biodiversity Action Plan[48].

A peat depth survey was undertaken for the entire landholding (Glen Dye Moor Habitats, peat & protected species. 2022. [redacted] with supplemental survey work carried out in areas where peat depth was variable and more accurate identification of deep peat pockets was required. Methodologies followed industry practices found in the Peatland Code Field Protocols version 1.1 dated March 2017 which included 100 x 100m sample points. Where supplemental transects were carried, these were completed over 2022 and 2023 by Scottish woodlands Ltd and these averaged 20m sample points along transect routes. Transects were located between the wider 100m by 100m grid resulting in an average spacing of transect lines at around 50m. Site specific opportunities to sample marginal ground where the perimeter of a deep peat pocket was measured in detail which resulted in sample plots at a less than 20m spacing in places.

- Planting design and cultivation decision making

  The choice of cultivation will be assessed against Scottish Forestry's 'Cultivation for upland productive woodland creation sites' Applicant's Guidance[49]. The aim of this guidance is to support forestry practitioners in making decisions about what cultivation techniques to use for upland productive woodland creation sites. It provides a framework for discussion at planning stage, to ensure reasoned and appropriate choices for cultivation are made based on the site's soil type(s) and related characteristics and in the context of long-term management objectives. Applying this guidance will help ensure that cultivation operations comply with UKFS requirements and guidelines on water and soils. In particular this will include identification of soil type and appropriate tree species, consider if cultivation is required, determine the soil-based objectives for cultivation and identifying techniques that will achieves these objectives. This information will then inform the woodland creation plan.

  Woodland Creation Application Guidance[50] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural

[46] DAFOR scale: Dominant > Abundant > Frequent > Occasional > Rare.
[47] JNCC spreadsheet of taxa designations & further information available at: http://jncc.defra.gov.uk/page-3408. Accessed 24/10/2022.
[48] North East Scotland Biodiversity Partnership biodiversity information for developers available at https://www.nesbiodiversity.org.uk/biodiversityinformation-for-developers/. Accessed 24/10/2022.
[49] Scottish Forestry. 2021. Cultivation for upland productive woodland creation sites: Applicant's Guidance. https://www.forestry.gov.scot/publications/1032-cultivation-for-upland-productive-woodland-creation-sites-applicant-s-guidance. Accessed 20 December 2024.
[50] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

prescriptions and environmental, economic, and social factors into a comprehensive plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

- Decision Support Tools: Ecological Site Classification and Forest Development Models

  The choice of tree species will be supported by use of Forest Research's Ecological Site Classification (ESC)[51]. ESC is a web-based decision support system to help forest managers and planners select tree species that are ecologically suited to particular sites, instead of selecting a species and trying to modify the site to suit. A "Forest Development Type"[52] is a long-term vision of how the species composition and structure of a forest stand is intended to develop.
  The concept encourages greater use of mixed-species stands and a wider variety of stand structures. It also promotes better use of site adapted species and natural regeneration. Forest Research has developed management tools which will help practitioners to use FDTs to diversify their forests and increase resilience.

- Diffuse Pollution Planning

  The Forestry & Water Scotland Initiative[53] publications including 'Know the Rules' brings together new and established resources to help forest owners, managers and practitioners follow good forestry practice to improve water management on their sites. Good water management helps reduce diffuse pollution risks from forestry operations. In turn this benefits the forest environment and wider landscape, helps compliance with water regulations and the UK Forestry Standard, and plays a key part in managing a forest sustainably. The initiative is supported by various organisations involved in Scotland's forestry sector and by the Diffuse Pollution Management Advisory Group (DPMAG), a partnership that focuses on protecting and improving Scotland's water environment by reducing rural diffuse pollution. This resource base was launched in January 2017.

[51] Forest Research ESC web-based system. https://www.forestresearch.gov.uk/tools-and-resources/fthr/ecological-site-classification/. Accessed 20 December 2024.
[52] Forest Research. Forest Development Types tools. https://www.forestresearch.gov.uk/tools-and-resources/fthr/forest-development-types/. Accessed 20 December 2024.
[53] Forestry and Water Scotland hosted by Confor. https://www.confor.org.uk/resources/forestry-water-scotland/. Accessed 17 December 2024.

4.14 Peatland

4.14.1 Peatland has been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.14.2 NVC and deep peat surveys carried out in 2022 identified extensive areas of blanket bog. The average depth of peat across the site was calculated as 0.61 m; the minimum 0.00 m (associated with dry heath, for example); and the maximum depth 5.56 m. The distribution of peat is complex because it relates to topography and secondarily, to losses through erosion. Peatland condition assessments indicated the majority of peatland is either modified or actively eroding. Peatland restoration being carried out on site increases the impact of the receptor to potential cross-boundary effects. Deep peats, defined as soils with a peat layer exceeding 50cm in depth, are important in their role for water regulation and carbon storage. Careful consideration of peatlands is important in afforestation designs. Planting on deep peat can result in carbon release, as well as potentially impacting on hydrologically connected habitats. As part of the wider Glen Dye Moor project, there is approximately 1,800ha of peatland restoration on eroded and de-graded peatlands. These areas are considered deep peats, therefore the effects, assessment and mitigation of afforestation, fencing and roading, will be accounted for within this section of the EIA Report regardless of their restoration status.

4.14.3 The following information sources were used to identify peatland:

- [redacted]**NVC Survey, Deep Peat Survey and Peatland Condition Assessment**
- **Aerial survey using fixed wing aircraft carried producing orthomosaic photography**
- **Supplemental survey transects to sample marginal ground identified within peat depth survey**

4.14.4 The potential likely effects from afforestation, fencing and roading include:

- **Carbon Sequestration:** Release of stored carbon through soil disturbance from cultivation and road construction.
- **Hydrological Change**: Changes to local water tables due to afforestation and road construction.
- **Soil disturbance**: Resulting from operations.

4.14.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance:** No planting on peatland more than 50cm in depth and planning new access tracks to avoid deep peat wherever possible.
- **Buffers:** Utilisation of low-density native woodland and natural regeneration to create transitional habitats.
- **Diffuse Pollution Planning**: During the planning stage of operations an assessment of diffuse pollution risk and instructions for prevention techniques will be carried out and form part of contract materials.
- **Emergency Planning**: Ensuring all operational contract include emergency response plans and prevention techniques to reduce risk of pollution.

4.14.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- NVC survey (baseline conditions)

  The National Vegetation Classification (NVC) is necessary for identifying habitats/plant communities of relevance to modern legislation (such as Annex I of the Habitats Directive, or GWDTE of the Water Framework Directive). It is therefore the primary system to which vegetation (& habitat) is related within this report, for the purposes of identification, description & mapping. Vegetation is identified,

mapped & described according to the five volumes of British Plant Communities[54] in accordance with the standard NVC method (as outlined in the NVC Users Handbook[55]). This involves walking the site on a route determined by topography/viewpoints and the need to sample distinctive areas. Homogenous areas are mapped onto rectified aerial photographs overlain with contours & other physical features to ensure accuracy. A single vegetation community or mosaic of more may be mapped, depending upon the scale and patterning of the vegetation. Where mosaics are mapped, the percentage cover of each NVC community is stated in the mapping. Characteristics of the vegetation and point-features too small to otherwise map are recorded as 'Target Notes'. These and the habitat & vegetation descriptions include lists of characteristic species that are semi-quantified using the DAFOR scale[56]. Notable species are those that are subject to nature conservation designation. The 2016 JNCC spreadsheet of taxa designations[57] defines these species and is used as the main point of reference in addition to the Tayside Biodiversity Action Plan[58].

- Deep peat survey methodology

  A peat depth survey was undertaken for the entire landholding (Glen Dye Moor Habitats, peat & protected species. 31Oct 2022. [redacted] with supplemental survey work carried out in areas where peat depth was variable and more accurate identification of deep peat pockets was required. Methodologies followed industry practices found in the Peatland Code Field Protocols version 1.1 dated March 2017 which included 100 x 100m sample points. Where supplemental transects were carried, these were completed over 2022 and 2023 by Scottish woodlands Ltd and these averaged 20m sample points along transect routes. Transects were located between the wider 100m by 100m grid resulting in an average spacing of transect lines at around 50m. Site specific opportunities to sample marginal ground such where the perimeter of a deep peat pocket was measured in detail which resulted in sample plots at a less than 20m spacing in places.

- Peatland condition assessment methodology

  A series of indicators are employed to assess the peatland condition across Glen Dye Moor. These include: • Low to moderate species-richness and evenness of the vegetation •Dominance of heather &/or hare's-tail bog-cotton. • Scarcity of notable or sensitive species (e.g. bog-mosses or small liverworts). •Presence/absence of notable structure (such as pools or hummock-hollow microtopography). •Presence/absence of erosion features (e.g. gullies). Using these indicators, the peatland condition is assessed into six classes corresponding to three classes of the Peatland Action system and four of the Peatland Code. The characteristics of the peatland condition units defined in this report are specified where their absolute & relative areas are given (in relation to the total peatland resource). Distribution of the condition classes is then mapped.

- Planting design

[54] Rodwell, J.S. 1991-2000. British plant communities. 5 Volumes. Cambridge University Press

[55] Rodwell, J.S. 2006. NVC Users' Handbook. Available at http://jncc.defra.gov.uk/page-3724. Accessed 24/10/2022.

[56] DAFOR scale: Dominant > Abundant > Frequent > Occasional > Rare.

[57] JNCC spreadsheet of taxa designations & further information available at: http://jncc.defra.gov.uk/page-3408. Accessed 24/10/2022.

[58] North East Scotland Biodiversity Partnership biodiversity information for developers available at https://www.nesbiodiversity.org.uk/biodiversityinformation-for-developers/. Accessed 24/10/2022.

The planting design will be assessed against Scottish Forestry's Supplementary guidance to support the FC Forests and Peatland Habitats Guidance Note (2000)[59]. Specifically adherence to the section of woodland creation. In accordance with UK Forestry Standard, avoid establishing new forests on soils with peat exceeding 50cm depth and on sites that would compromise the hydrology of adjacent bog habitats. This guidance offers a decision-making framework based on the likely carbon storage or release from different management options on deep peats, to complement the advice on managing forestry on peatland for other objectives given in the original Guideline Note.

- Guidance on hydrologic effects of forestry

  The 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals'[60] intends to help forest managers in identifying Groundwater Dependent Terrestrial Ecosystems (GWDTE) and assessing the risk of woodland creation operations to them and their related groundwater flows.

[59] Scottish Forestry. 2016. Supplementary guidance to support the FC Forests and Peatland Habitats Guideline Note (2000). https://www.forestry.gov.scot/publications/5-supplementary-guidance-to-support-the-fc-forests-and-peatland-habitats-guideline-note. Accessed 20 December 2024.

[60] Confor, FCS, SNH, SEPA Working Group. 2018. Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals.

4.15 Ground Water Dependant Terrestrial Ecosystems (GWDTE)

4.15.1 Groundwater Dependant Terrestrial Ecosystems have been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.15.2 A due diligence survey (2022) identified GWDTEs within the project boundary. Their report showed that the underlying geology was Late Silurian to Early Devonian, igneous intrusion which is known to have "'small amounts of groundwater in [the] near surface weathered zone and secondary fractures' and 'rare springs'". The areas of GWDTE were assessed in relation to their potential groundwater dependency.

4.15.3 The following information sources were used to identify GWDTEs:

- [redacted]**NVC Field Survey**
- **High Resolution Aerial Photographic Survey**

4.15.4 The potential likely effects from afforestation, fencing and roading include:

- **Shading**: Can improve species-poor communities, where there is single species dominance such as grass, to improve diversity of flora.
- **Reduction of grazing pressure**: Can improve diversity of plant communities within GWTDEs
- **Hydrological Change**: Changes to local water tables due to afforestation and road construction.
- **Ground Disturbance**: Impacts to soil and vegetation from ground preparation, fencing, and infrastructure works

4.15.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Avoidance of Planting**: No tree planting on GWTDEs.
- **Species Choice**: No planting of productive conifer species within 20m of Groundwater Dependent Terrestrial Ecosystems (GWDTE) and planting of a transitional 'wet woodland' mix within 20m of ground water dependant terrestrial ecosystems, GWDTEs, (creating an ecotone between dense planting and GWDTEs). This will be planted at a variable density incorporating gaps within the canopy while meeting the average stocking density required by funding contracts.

4.15.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- NVC survey (baseline conditions)

  The National Vegetation Classification (NVC) is necessary for identifying habitats/plant communities of relevance to modern legislation (such as Annex I of the Habitats Directive, or GWDTE of the Water Framework Directive). It is therefore the primary system to which vegetation (& habitat) is related within this report, for the purposes of identification, description & mapping. Vegetation is identified, mapped & described according to the five volumes of British Plant Communities[61] in accordance with the standard NVC method (as outlined in the NVC Users Handbook[62]). This involves walking the site on a route determined by topography/viewpoints and the need to sample distinctive areas. Homogenous areas are mapped onto rectified aerial photographs overlain with contours & other physical features to ensure accuracy. A single vegetation community or mosaic of more may be mapped, depending upon the scale and patterning of the vegetation. Where mosaics are mapped, the percentage cover of each NVC community is

[61] Rodwell, J.S. 1991-2000. British plant communities. 5 Volumes. Cambridge University Press

[62] Rodwell, J.S. 2006. NVC Users' Handbook. Available at http://jncc.defra.gov.uk/page-3724. Accessed 24/10/2022.

stated in the mapping. Characteristics of the vegetation and point-features too small to otherwise map are recorded as 'Target Notes'. These and the habitat & vegetation descriptions include lists of characteristic species that are semi-quantified using the DAFOR scale[63]. Notable species are those that are subject to nature conservation designation. The 2016 JNCC spreadsheet of taxa designations[64] defines these species and is used as the main point of reference in addition to the Tayside Biodiversity Action Plan[65].

- Planting design

  Woodland Creation Application Guidance[66] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural prescriptions and environmental, economic, and social factors into a comprehensive plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

- Guidance on hydrologic effects of forestry

  The 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals'[67] intends to help forest managers in identifying Groundwater Dependent Terrestrial Ecosystems (GWDTE) and assessing the risk of woodland creation operations to them and their related groundwater flows.

[63] DAFOR scale: Dominant > Abundant > Frequent > Occasional > Rare.

[64] JNCC spreadsheet of taxa designations & further information available at: http://jncc.defra.gov.uk/page-3408. Accessed 24/10/2022.

[65] North East Scotland Biodiversity Partnership biodiversity information for developers available at https://www.nesbiodiversity.org.uk/biodiversityinformation-for-developers/. Accessed 24/10/2022.

[66] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

[67] Confor, FCS, SNH, SEPA Working Group. 2018. Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals.

4.16 Water, Including the Drinking Water Protection Area (DWPA)

4.16.1 The water environment, including the Drinking Water Protected Area (DWPA), has been identified as a sensitive receptor for inclusion in the EIA Report and have therefore been scoped in.

4.16.2 During due diligence consultation work in 2023 Scottish Water identified a designated Drinking Water Protection Area (DWPA) covering our proposal boundary as it sits within a drinking water catchment where a Scottish Water abstraction is located. This was re-confirmed in 2024 with Scottish Water when it was noted that geodata supplied by the Scottish Government showed incorrect coverage of the DWPA. DWPA's are identified and protected under Article 7 of the Water Framework Directive (2000/60/EC) and the Water Environment (Register of Protected Areas) (Scotland) Regulations 2004. It has also been confirmed by Scottish Water that an abandoned infrastructure asset is present within the project boundary in the form of a 150 Ductile Iron raw water main and a reservoir. This infrastructure has not yet been decommissioned as of 2024 but is confirmed as abandoned and will not be assessed as a potential environmental impact receptor.

The water environment within the project boundary also includes a number of named rivers and tributaries. There is an estimated 122 kilometres of watercourses within the property boundary. The Water of Dye flows eastwards where it joins the Water of Feugh and eventually meets with the River Dee. Multiple small burns contribute to the Water of Dye, the most notable tributary being the Water of Charr which flows north to join the Water of Dye. To the north, the Water of Aven marches the proposal boundary and takes on multiple small tributaries as it flows eastwards to join the Water of Feugh. The catchment of the Water of Feugh, including the Dye, Aven and all their tributaries is within the district of the Dee District Salmon Fishery Board.

Classified watercourses are monitored by SEPA under the Water Classification scoring[68], which describes their condition or status using biological quality elements, hydrology, morphology, and assessment of invasive non-native species (INNS).

Classified Watercourse	Condition
Water of Dye/Spital Burn	High
Water of Dye/Water of Charr	Good
Water of Feugh/Burn of Greendams	Moderate
Water of Aven/Feugh Upper Catchment	High

4.16.3 The following information sources were used to identify the issue:

- **Correspondence with SEPA**
- **Correspondence with Scottish Water**
- **Scottish Water Asset Plan Provider**
- **Correspondence with Dee District Salmon Fishery Board**
- **DWPA register[69] hosted by SEPA**
- **SEPA Water Classification Scoring**

4.16.4 The potential likely effects from afforestation, fencing and roading include:

[68] SEPA. Water Environment Hub. https://informatics.sepa.org.uk/RBMP3/. Accessed 19 December 2024.
[69] SEPA. Register of protected areas. https://www.sepa.org.uk/environment/water/monitoring/protected-areas/. Accessed 19 December 2024.

- **Diffuse and point-source pollution**: Resulting from operational spills of oil, fuel, or other chemicals (pesticides and fertilisers), as well as potential sediment run-off following soil disturbance.
- **Hydrological Change**: Changes to local water tables or changes to peak flow runoff due to afforestation and road construction. This may also include natural floodwater abatement effects and water temperature changes with reduced solar exposure.
- **Riparian Habitat Modification**: Creation of riparian woodland resulting in shading, nutrient and organic material input, bankside stabilisation of watercourses.

4.16.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Diffuse Pollution Planning**: During the planning stage of operations an assessment of diffuse pollution risk and instructions for prevention techniques will be carried out and form part of contract materials. This includes a 50m buffer for refueling, storage or handling of fuels, oils or hazardous materials around all surface watercourses, boreholes and springs.
- **Emergency Planning**: Ensuring all operational contract include emergency response plans and prevention techniques to reduce risk of pollution.
- **Riparian Planting**: Creation and expansion of riparian woodlands.

4.16.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Planting Design

  Creating and managing riparian woodlands UK Forestry Standard Practice Guide[70]. The purpose of this Practice Guide is to assist forest and woodland owners, planners and managers, by giving more detailed information on planning, designing and managing riparian woodland to comply with UKFS Requirements and Guidelines. This Guide provides an overview of the benefits of riparian woodland and sets out good practice aimed at mitigating any potentially adverse effects on the freshwater ecosystem. Guidance is provided on planning new riparian woodland, restoring riparian zones within existing conifer forests, and on the management of riparian trees and woodland. It also provides specific sections relating to the management of deadwood, protected species and the control of invasive non-native species in riparian buffer areas. Emphasis is placed on achieving a variable level of riparian woodland cover that is appropriate to local conditions, sensitivities and objectives. The Guide is based on ecological principles and is informed by research results and practical experience.

- Diffuse Pollution Planning

  Scottish Water have produced a List of Precautions for Drinking Water and Assets. 'Annex 1: Precautions to protect drinking water and Scottish Water assets during forestry activities'[71] provides requirements and precautions for protecting drinking water. This document will be used to guide the diffuse pollution control plan.

[70] Broadmeadow S, Nisbet T, 2024. Creating and managing riparian woodlands UK Forestry Standard Practice Guide. Forest Research.

[71] Scottish Water. Annex 1: Precautions to protect drinking water and Scottish Water assets during forestry activities. https://www.scottishwater.co.uk/-/media/ScottishWater/Document-Hub/Key-Publications/Energy-and-Sustainability/Sustainable-Land-Management/131120SWListOfPrecautionsforDrinkingWaterandAssetsForestryEdC.pdf. Accessed 19 December 2024

The Forestry & Water Scotland Initiative[72] publications including 'Know the Rules' brings together new and established resources to help forest owners, managers and practitioners follow good forestry practice to improve water management on their sites. Good water management helps reduce diffuse pollution risks from forestry operations. In turn this benefits the forest environment and wider landscape, helps compliance with water regulations and the UK Forestry Standard, and plays a key part in managing a forest sustainably. The initiative is supported by various organisations involved in Scotland's forestry sector and by the Diffuse Pollution Management Advisory Group (DPMAG), a partnership that focuses on protecting and improving Scotland's water environment by reducing rural diffuse pollution. This resource base was launched in January 2017.

[72] Forestry and Water Scotland hosted by Confor. https://www.confor.org.uk/resources/forestry-water-scotland/. Accessed 17 December 2024.

4.17 Landscape, Including the Clachnaben & Forest of Birse Special Landscape Area (SLA)

4.17.1 Landscape has been identified as a sensitive receptor for inclusion in the EIA Report and has therefore been scoped in.

4.17.2 The Special Landscape Areas SLA are local non-statutory landscape designations placed on an area that exhibits particular qualities and characteristics within them that are valued locally. The Clachnaben and Forest of Birse SLA is one of the wildest parts of Aberdeenshire outside the National Park, while Clachnaben is a prominent landmark for miles around. A landscape Review carried out in 2023-2024 identified the scenic designations, landscape character, and included cursory visualisations from key vantage points as well as a summary of forest design elements incorporated into the proposals. Following review by [redacted] Scottish Forestry, it was advised that further assessment was required and preparation of an LVIA would be advised. This supported advice from NatureScot noting the regionally distinctive landscape character and SLA status, also advising an LVIA be carried out.

4.17.3 The following information sources were used to identify sensitivities:

- **Aberdeenshire Local Development Plan**[73]
- **Landscape Character Assessment**
- **Scottish Woodlands Landscape Review**
- **Correspondence with NatureScot**

4.17.4 The potential likely effects from afforestation, fencing and roading include:

- **Visual Impacts:** Changes resulting in alteration of key landscape characteristics and special qualities.

4.17.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Woodland Design**: Species choice, shape, pattern, density and extent of planting.
- **Fence and Road placement**: New infrastructure designed in consideration of visual impact.

4.17.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Aberdeenshire Local Development Plan Appendix 13

  This Appendix has been produced to introduce a local landscape designation into the Aberdeenshire Local Development Plan (LDP) area. The purpose of the Appendix is to support Policy E2 “Landscape” of the Aberdeenshire Local Development Plan 2023 (LDP 2023). The Appendix is to be used in the decision making process with regard to Development Management, but it may also provide guidance to communities and landowners in coming to decisions affecting the management and use of land within Special Landscape Areas.
- Planting Design

  Woodland Creation Application Guidance[74] describes the process of preparing a woodland creation proposal brings together management objectives, silvicultural

[73] Aberdeenshire Council. 2023. Aberdeenshire Local Development Plan: Appendix 13 Aberdeenshire Special Landscape Areas. https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2023/. Accessed 19 December 2024.

[74] Forestry Commission Scotland. 2017. Woodland Creation Application Guidance. Forestry Commission Scotland.

prescriptions and environmental, economic, and social factors into a comprehensive plan to deliver woodland creation through sustainable forest management. A woodland creation proposal should provide an understanding of the broader context within which the woodland creation is envisaged and describe the precise balance of objectives for sustainable forest management between economic (e.g. timber production), environmental (e.g. biodiversity) and social objectives (e.g. recreation provision). It translates the strategic and management objectives into a detailed design with the required site operations via a site level assessment and analysis. Your woodland creation proposal must meet the requirements and follow the guidelines set out in the UK Forestry Standard. The UK Forestry Standard (UKFS) sets out the criteria and standards for the sustainable management of forests and woodlands in the UK and aims to promote good forestry practice.

- Design Techniques for Forest Management Planning[75]

  This Practice Guide provides a step-by-step guide to the design techniques used in the forest management planning process. The guidance applies to the creation of new forests and woodlands, whether by planting or natural regeneration, and the management of existing forests and woodlands.

- LVIA

  Completion of a Landscape Visual Impact Assessment and consultation with a competent and qualified individual.

[75] Forestry Commission. 2014. Practice Guide: Design techniques for forest management planning. Forestry Commission.

4.18 Wildfire

4.18.1 Wildfire has been identified as a sensitive issue for inclusion in the EIA Report and has therefore been scoped in.

4.18.2 The current risk is high, and the risk will remain at an overall high level until new woodland creation has reached canopy closure, and peatland restoration areas have rewetted. Once habitat change has occurred, risk is expected to change to moderate risk over the longer term. Fire risk will change over time as Glen Dye Moor undergoes land use changes, and restoration works, with the greatest changes expected within the first ten years of operations (2023 to 2033).
Most wildfires in the UK occur in spring and summer. This is because a large volume of ground vegetation, a significant proportion of which may be dry, combined with extended periods of hot or dry weather, increase fire risk. The vast majority of wildfires are caused by people. A number of factors contribute to wildfire risk, including land use and vegetation type. Whilst this proposal will encourage and enhance recreational opportunities, it does not change the type of public use. Prohibition of fires including camp fires and barbeques will continue.

4.18.3 The following information sources were used to identify sensitivities:

- **General Site Survey**
- **High Resolution Aerial Photographic Survey and Digital Terrain Model**

4.18.4 The potential likely effects from afforestation, fencing and roading include:

- **Fuel loading**: Change of available fuels both in type and quantity.
- **Access & Preparedness**: Emergency responses to wildfire.

4.18.5 The EIA Report will assess the potential effect, the significance and possible mitigation measures. Possible mitigation measures may include:

- **Planning**: Wildfire Management Plan will be in place. This will include cross-boundary effects.
- **Signage**: Fire prevention signage and other information signage to be used on site
- **Fire breaks**: Maintaining fire breaks in line with the Wildfire Management Plan.

4.18.6 The assessment within the EIA Report will evaluate the significance of these effects using the following approaches:

- Wildfire Management Plan
  This plan will include an assessment of the current setting and expected changes in relation to the proposals. It will identify and plan prevention measures, strategies for reduction of wildfire risk and impacts, response in the event of a wildfire and remediation after a wildfire event.

5. Other Issues Not Scoped Into EIA

Additional topics important to UKFS compliance or other statutory frameworks have been identified. These topics are not included within the Environmental Impact Assessment though they will be referenced and explained within the EIA Report for context. These will be addressed within supporting information, subsequent statutory approvals to which they may be subject, or within Forestry Grant Scheme funding contracts. They are contained within an Issues Log developed during the due diligence process and EIA Screening process with Scottish Forestry.

The following list is not being considered under the Environmental Impact Assessment as defined by The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. These items are scoped out of the EIA Report as potentially have a significant environmental impact.

- Protected Species (birds), Hen Harrier, Short eared owl, Goshawk, Protected species (mammals), Badger, Bats (all species), Watervole, Otter, Protected Species (aquatic), Butterfly & Moth species (other), Prey Populations, Invasive non-native species
- Existing Woodland, Open Ground Habitats, Tree Species Choice
- Monitoring, Community Engagement
- Land Use including cumulative impacts, Phasing of operations, Third party access & general road access, Road Safety
- Plastics and Waste, Pesticides
- Private Water Supplies (of which there are none within the project boundary)

Further information on the due diligence process and proposal details, including information on this list of additional topics is available at https://glendyemoor.com/

6. Summary Statement

Decisions to scope items into the EIA have been reached based on input from consultation bodies as well as agreed consultees with a focused competence on specific issues. This decision-making process ensures suitable input to identify potentially significant issues, relevant assessment methodologies, likely impacts to those receptors, and other pertinent information required as part of the environmental impact assessment. As a result of this process the table below was agreed at the scoping meeting held on the 11th December 2024 and the listed issues noted as 'In' are to be included within the EIA Report.

	Issue	Scoped In/Out of EIA Report	Importance[76]
1	River Dee Special Area of Conservation (SAC)	In	National
2	Local Nature Conservation Site (LNCS)	In	Local
3	Eagles	In	Not specified
4	Merlin	In	National
5	Curlew	In	National
6	Waders (other)	In	Local
7	Black Grouse	In	National
8	Priority Plants	In	Local-National
9	Large heath butterfly	In	Regional
10	Recreation	In	Local
11	Deer Management	In	Local
12	Archaeology	In	Local-National
13	Soils/Ground Cultivation	In	Local
14	Peatland	In	Local
15	Ground water dependant terrestrial ecosystems (GWDTE)	In	Local
16	Water (including Drinking Water Protected Area)	In	Regional
17	Landscape	In	Regional
18	Wildfire	In	Local

This Report was compiled on the 20th December 2024 by:

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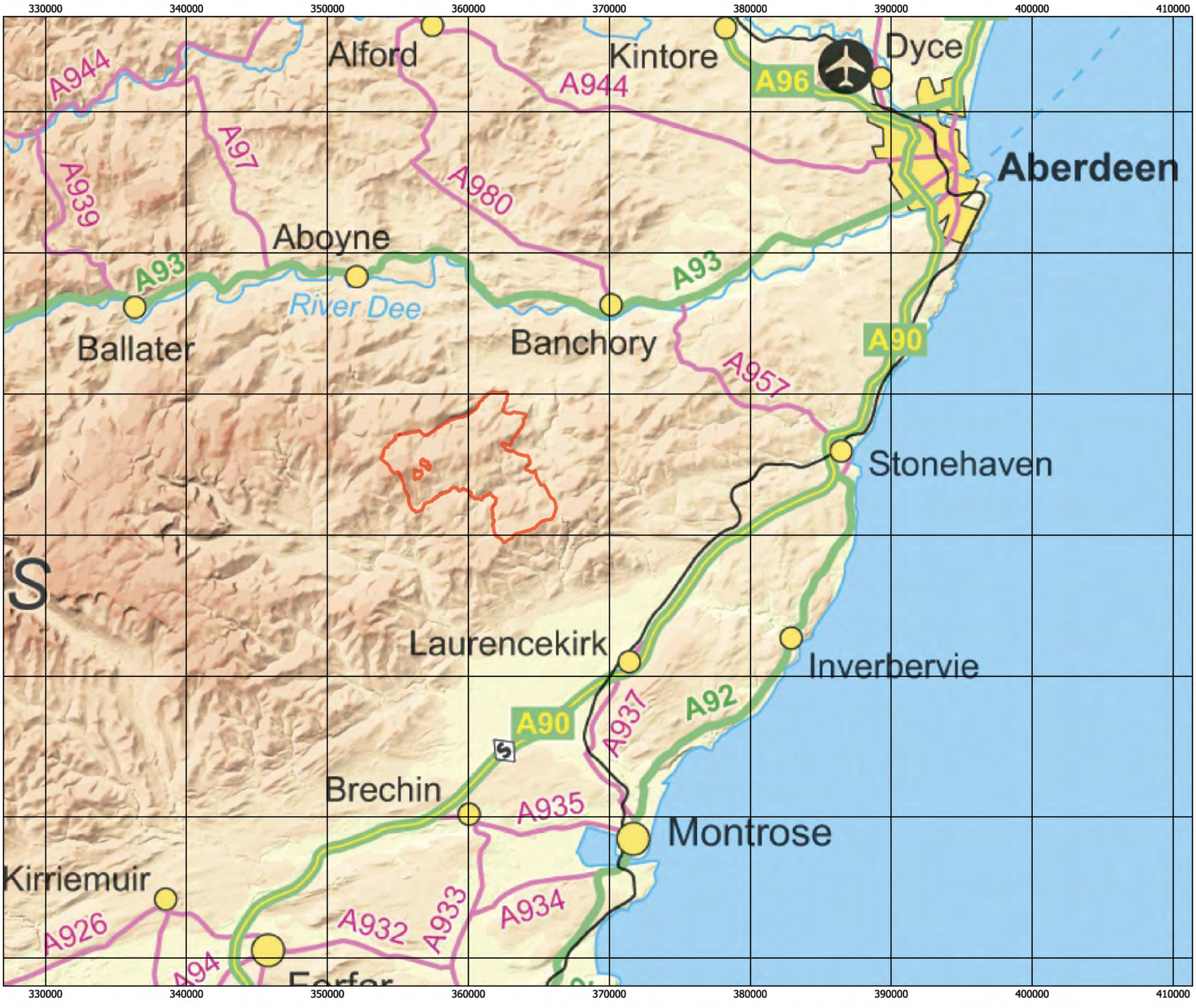
[76] 'Importance' is used to indicate the importance of each issue in relation to local regional or national context. It is assumed that impacts to locally important issues may affect the locality while impacts to regional issues may affect the region. Nationally important issues are of the highest priority in terms of potential impacts.

7 List of Figures and Appendices



SCOTTISH WOODLANDS

Glen Dye Moor
Woodland Creation

Figure 1
General Location Map

Created on: 20/12/2024

Legend

Proposal Boundary

1:250,000

Scale correct at A3
Centre Point: 369194, 782410

360000

790000

780000

Main Access
Spittal Burn Car Park
National Grid Ref: NO 64752 84465
easting, northing: 364752, 784465
lat/long: 56.9500, -2.5810
what3words:
///superbly.rejoin.strictest

360000

SCOTTISH WOODLANDS

Glen Dye Moor
Woodland Creation

Figure 2
Detailed Location Map

Created on: 20/12/2024

Legend

- Proposal Boundary
- Not part of proposal area

Location plan sufficient to identify the land.

1:50,000

Scale correct at A3
Centre Point: 360101, 785055

SCOTTISH WOODLANDS

Glen Dye Moor
Woodland Creation

Figure 3
Proposal Map

Created on: 20/12/2024

Legend

- Proposal Boundary
- Public road
- Existing forest road
- Existing ATV track
- Proposed New Forest Track
- Proposed New Deer Fence
- New funded Grouse Markers
- New Vehicle Gate
- New Vehicle and Pedestrian
- New Pedestrian Gate

Future Woodland

- Existing Woodland
- Mixed Native Broadleaves
- Mixed Native Pine and Broadleaves
- Mixed Productive Conifer
- Native Low Density
- Natural Regeneration
- Semi-Open Mixed Native

This map illustrates the afforestation, fencing and roading proposals. Finalised proposals will be contained within the EIA Report.

1:40,000

Scale correct at A3
Centre Point: 359983, 784756

APPENDIX 1: ISSUES LOG ISSUED BY SCOTTISH FORESTRY

WCP Ref	Issue Type	WCP ISSUE HEADING	Issue Detail	Applicant Comment	Scottish Forestry Comment	Suggested Mitigation	Status	Significance	EIA SCREENING ISSUE
1	SOIL	Deep peat and blanket bog	No woodland creation should occur on deep peat. (Community member 3 18Aug22) (DSFB 14Sept22)	A peat depth survey was carried out across the project area, no areas 50cm or greater of deep peat will be planted. This also fits into Forestry Grant Scheme eligibility requirements which dictate that deep peat will not be planted. (21Feb23, [redacted] First EIA screening submission 3rd March 2023 includes Ecological survey which details the peat survey and methodology. Second EIA screening submission 17th October 2023, includes a new EIA Constraints Map 'Habitats & Water' which shows deep peat (mapped with a 20m buffer) alongside other habitat types. Fifth EIA screening submission 30 August 2024 includes a new Soil Sensitivity Map and Group Preparation Map, more detail has been included within a new section 8.2 'Deep Peat Methodology and Approach' and a "Constraints Map Deep Peat". This additional information illustrates the individual point data for the entire deep peat survey works and describes the methodology used to undertake the survey work in full. It also includes some discussion on mappable deep peat, and planting design around deep peat. The Species Maps (9.1.1-9.1.17) have also been updated to show deep peat points within the proposals where these were not mappable to better illustrate the design process around deep peat. No deep peat is proposed for planting. Buffers around deep peat from non-native conifer planting are a minimum of 20m but in many cases (as shown on Species Maps 9.1.1 to 9.1.17) a greater distance is provided and the design incorporates a transition of woodland from open peatland to upland birch to native W18 Scots pine to commercial conifer. Planting around Netty Hill (9.1.11) is a good example of this. Peat conditions around proposed roads are now shown on 3.2.1-3.3.3 New Infrastructure Maps and one of the proposed road lines has been removed from the proposal due to further investigations into an alternative route. (30Aug24, [redacted]	(5June24, notes from meeting with [redacted] Deep peat should be shown in reference to the ground preparation and species. (01.07.24, [redacted] feedback) Peat survey results and methodology has not been provided in full and should include comment on the distribution and extent of unmappable deep peat to determine whether or not it's appropriate to remove clusters of unmappable deep peat from the planting area. Planting design, roading and fence line should all be mapped over peat mapping to demonstrate appropriate mitigation as required. Proposal should also consider the hydrological connectivity of deep peat areas and any mitigation required to maintain this. It should also consider and the fit between peatland restoration and new planting with respect to suitable buffers and species choice mitigate risk in the long term. 09.09.24 Peat mapping noted in Section 8.2 and Species Maps 9.1.1 -17. Unmappable deep peat point data should be identified as such on maps to avoid confusion. Mitigation item B15 should also state that unmappable deep peat will be marked on the ground to avoid disturbance and that any further areas of deep peat found during operations will not be planted. Mitigation B15 states that a 20m buffer has been applied to contiguous deep peat areas. Can you provide more rationale for the 20m buffer and more detail on where larger buffers have been provided? The UKFS excludes planting on deep peat soils (more than 50 cm peat depth) and on sites that would compromise the hydrology of adjacent bog or wetland habitats. Can you confirm how you have assessed hydrological connectivity across the site? *These buffers should also be maintained as open ground buffers and should not be subject to any cultivation or planting to reduce risks of seeding into deep peat* Figure 2 Deep Peat assessment dated Oct 2023 but Map 8.2.2 datedAug 22 - could these be incorporated or overlayed somehow? WOuld also be useful to define the peatland restoration area on this map or a separate map to illustrate that relative to planting footprint	A full mitigation list is included as an appendix, the mitigation codes listed here relate to this specific topic A05, A10, A15, B15			UKFS
~~1~~	~~SOIL~~	~~Deep peat and blanket bog~~	~~Will deep peat be planted with trees? 25.01.23 Note 1 This item was added by Scottish Forestry 1 Jul 24 and should be removed. This is a duplicated key issue derived from a Q&A document produced following early due diligence work and is not a 'Member of Public' consultation response as noted. These questions were created as part of a Q&A exercise to post information about the scheme onto the glendyemoor.com and improve public awareness and understanding of the proposals. Each question was derived from multiple responses which often shared a similar query or thread. This Q&A sheet was used at the 2023 public drop in sessions to update interested parties on the approach being taken as proposals developed through the concept stage. For full details on the Q&A and how this related to responses to consultation please request to view the issues log dated 15th November 2022 which cross-references all responses from the due diligence consultation to the Q&As. Please note this pre-dates the first key issues log submitted as part of the screening application. Although the Q&A was included within the Consultation Summary, it was not meant to represent the key issues in terms of proposal processing and submission. All remaining Q&A entries are shown as red text and scored out below. [redacted] 26Aug24)~~						
~~1~~	~~SOIL~~	~~Deep peat and blanket bog~~	~~What criteria do you use to say that a certain area is right for peatland restoration and another area is right for reforestation. Is it simply peat depth? If so, what value did you use? Will areas restored remain as peatland or be planted~~						
~~2~~	~~BIODIVERSITY~~	~~Project has the potential to impact Golden Eagle~~	~~Eagles forage on certain areas, will these areas be monitored and retained? What research will be used to design forests around areas used by eagles? MeP 25.01.23~~	Golden Eagles are one of the iconic species which can be seen soaring above Glen Dye Moor on a good day. Recent research will be used to aid in designing a new woodland which will maintain or enhance this area for eagles. Use of the Golden Eagle Terrain (GET) model, which indicates potential usage of areas by eagles, will be used to aid in afforestation planning. This will ensure that areas potentially important for eagles are mitigated through prey habitat enhancement or other improvements. Operations will also take into account potential disturbance to eagles and implement timing restrictions in sensitive areas during critical periods of the year. Breeding bird surveys carried out will also aid in identifying active areas and provide recommendations for woodland design elements. (21Feb23, [redacted] First EIA screening submission 3rd March 2023 includes a habitats and species survey. Second EIA screening submission 17th October 2023, included an updated 'EIA Screening Request Form' with detailed analysis of impacts to eagles following assessment and discussion with [redacted] lead researcher responsible for the new GET modelling. A new Constraint Maps for 'Wildlife' was also included. Third EIA screening submission 31st January 2024 updated the above information and included a new suite of 1 10,000 'EIA Screening Raptors Maps 1-16' showing eagle territory and GET ranges in relation to species design. Fourth EIA screening submission 11th March 2024 included a new 'Golden Eagle Range Map'. This map shows areas modelled to be highly used by eagles and the amount of woodland cover being proposed within them using a greyscale colouring. These same range areas are shown on the suite of 1 10,000 'EIA Screening Raptors Maps 1-16'. Fifth EIA screening submission 30 August 2024 includes additional clarification as discussed with [redacted] contacted [redacted] regarding our discussions and no further response was received from [redacted] who also manages the eagle tagging data), this is assumed to suggest that there are no further comments following correspondence with [redacted] Geotagged information is held by [redacted] but was not provided to the applicant. Discussions between Scottish Forestry [redacted] are believed to have occurred and have resolved any outstanding issues regarding potential eagle impacts. Although the breeding bird survey report included a recommendation for no planting, following discussions with [redacted] 2023, it was determined that natural regeneration and/or semi-open canopy native planting would be suitable which has been incorporated into the design. This was partially due to the steep gorge characteristics and the presence of existing mature woodland resulting in less impact to the locality. It is also noted that eagles have not successfully bred at this site for a number of years though the planting design is taking a conservative approach by creating favourable woodland habitat in the hopes that the territory will remain suitable and prey species will increase for future pairs of eagles. Please note an overview map of eagle foraging corridors was provided in the second, third, fourth and fifth EIA screening submissions, this is now labelled as Maps 3.3.3, 9.3.1 to 9.3.16, a new A1 9.3.17, and at last submission a new map was produced which is now referenced as 9.5 Eagle Range Map. An overview of the corridors and how this was assessed is also included in the EIA Screening Request Form within section 1.3.2. Discussions on the potential impact using a worst case scenario for both assumed existing ranges and dispersing eagles, this is covered within the confidential eagle annex included within 8.3 Breeding Bird Survey which discusses the territorial ranges. This annex also notes that the worst case scenario is likely offset by benefits of planting extensive areas of native woodland. This assessment also takes into consideration all areas of GET modelling which are 6 or greater	(13Apr23, email from [redacted] Eagle constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (10May23, notes from meeting with [redacted] Close off tracks to reduce disturbance from people. (29Nov23, email from [redacted] Need maps showing Golden Eagle hunting range and how upper edge planting has been adapted to limit effect. (26Feb24, email from [redacted] More explanation regarding affected hunting range, possible planting disturbance and large-scale map demonstrating how the planting design incorporates/affects the hunting requirements.. (31May24, email from [redacted] Eagle range - more detail on the impact and the effect - how planting design accommodates this? (5June24, notes from meeting with [redacted] Include justification for the impact noted, referencing Alan Fielding. (16.07.24 [redacted] feedback) noted that bird survey was carried out between April - July 2022 and eagle were observed and an eyrie is located 200m from the project boundary. GET modelling and appraisal by [redacted] also noted. Have you made any effort to get satellite tag data for the GE to illustrate how this bird/pair use the project area across the year and to determine how much of the project area is within their foraging range? Can you provide an overview map of eagle foraging corridors for context? Bird survey explicitly states no planting within 500m of eyrie however proposal is for LD-NBL which merlin assessment states has moderate risk of displacing two merlin territories - further clarification required. Proposal doesn't refer to potential cumulative impacts on habitat loss as a result of wind farm. Conclusion that overall significance of effect is less than significant is not consistent with later statement that 23% of proposal area will be partially or fully impacted eagle habitat as a result of the project. Proposal also lacks operational detail on mitigation measures to reduce disturbance and access mitigation to divert footfall from eyrie buffer and reduce recreational disturbance 18/07/24 Sadly I am aware of the disappearance of one or both of these birds over the last few yrs. and do not think they had transmitters fitted , it remains a viable range though and would expect breeding re occupancy very soon if it has not already happened. 06.09.24 this section really needs to evidence conversations between SF and [redacted] and Watson & Fielding. Need correspondence to over-rule 2022 survey recommendations for no planting within 500m. [redacted] assessment also doesnt consider impacts of windfarm and ground to the immediate SW of the site being effectively off-limits due to windfarm but documents freely available on Energy Consents Unit record GE activity to the SW and make reference to an eyrie which may be same as that associated with this proposal. Its the responsibility of the applicant to provide the detail on potential impacts and gain agreement of windfarm developer to release confidential data to SF in support of the project. Windfarm application also makes reference to a Regional Eagle Conservation Management PLan but this is not available online. This also correlates with statement elsewhere that habitat loss requires to be assessed regionally. Proposal needs to consider Regional Eagle Conservation Management PLan as appropriate. Unclear as to if RSPB have been engaged on eagle issues and if Dr Weston (and [redacted] regards to merlin) are representing their own views or those of the NERSG who should be asked to comment if not already represented. It would also be useful to confirm the current breeding status of any pair as likely more activity has been observed in last two years. Bird survey suggests that actual losses only determined once scheme finalised' – any intention of reviewing once outline planting is agreed? Suggest this would be a good idea given no other consultee input evidenced. Planting assessment uses GET 8-10. B survey uses 6+. Suggest this decision required to be explained. Did NS advise? The conclusion that 23% of available territory to be partially or fully-impacted as a result of the new planting, and without considering the impact of the adjacent windfarm, does not correlate with the suggestion that mitigation will reduce the likely impacts from 'moderate' to 'minor'. No reference in SOR to how materials will be set out - if helicopter flights are required, helicopter flight plan may be required to demonstrate avoidance of disturbance to eyrie.	The mitigation codes listed here relate to this specific topic A09, A10, B16, B18, B19, B23			Golden Eagle Consultees: NatureScot RSG Alan Fielding RSPB Ewan Weston
2	BIODIVERSITY	Project has the potential to impact Golden Eagle	monitoring and retaining range (07.24 JL)						
2	BIODIVERSITY	Project has the potential to impact Golden Eagle	Birds Use of Eagle modelling may aid in design development. (Community member 3 18Aug22) (RSPB 12Sept22) (NatureScot 14Sept22)						
2	BIODIVERSITY	Project has the potential to impact Golden Eagle	Cumulative impacts of land use change and adjacent windfarm. (SF 07.24) The ornithology chapter, and relevant annexes/addendums, of the Environmental Impact Assessment report that was carried out for the Glen Dye Wind Farm may contain data that would be useful in developing your proposal. We recommend you contact Coriolis Energy to discuss access to this data. (NS Sept 2022)	The Coriolis Energy information relating to eagles was obtained through confidential agreement and reviewed to assess potential cumulative impact of proposals. The nearest turbine location from this information sits 5.9km from the eagle site to the north of the Glen Dye Moor proposal area. Significant areas of habitat restoration are planned within the neighbouring land and will result cumulatively in substantial areas of improved habitats for prey species. Details can be requested from Coriolis Energy within their 'Glendye Wind Farm Al 2021 Appendix 3.2 Outline Biodiversity Net Gains Management Plan for Glendye Wind Farm' submitted as part of their planning approval. [redacted]	(16.07.24 [redacted] There is no reference to the Glen Dye Wind Farm, its EIA Report or contact with Coriolis Energy within this submission. To provide a Screening Opinion, SF will have to consider the cumulative impacts of land use changes which may have an impact on golden eagle and other raptors. Engagement with the wind farm project will be required in determining how raptors are currently using the site and likely impacts. The bird survey provided notes that habitat within 500m of a turbine tower will be closed habitat to golden eagle so this factor should be considered alongside the proposed planting to consider cumulative impacts 12.09.24 Appendix 3.2 can be downloaded from ECU website and highlights the areas of Additional BNG identfied as windfarm mitigation. THis relates to peat restoration and is covered in Issue 42 with regards to land use and implications for this proposal. See also previous comment on windfarm under Issue 2 regarding the responsibilty of hte applicant to provide sufficient supporting information	The mitigation codes listed here relate to this specific topic A09, A10, B16, B18, B19, B23			

3	BIODIVERSITY	Protected and sensitive bird species – curlew ~~/ other raptors~~	Potential impacts on curlew. good to better understand what measures will be taken to ensure that the currently healthy population of red listed waders such as Curlew and Lapwing, especially between Spital and Charr Bothy, will remain in good numbers. We would be grateful if you could please share those plans with us ? (Feughside CC Sept 2022)	Woodland creation and peatland restoration designs will take into account results from breeding bird surveys. This will ensure that where significant wader populations are present, these are suitably protected from disturbance or habitat change. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes a habitats and species survey. Second EIA Submission 17th October 2023 included a new 'EIA Constraints Map – Wildlife' showing breeding territories. Third EIA screening submission 31st January 2024 included a new suite of detailed 1 10,000 'EIA Screening Waders Maps 1-16' with annotations noting mitigations included in the design. A new appendix was also created, 'Curlew Assessment Summary' which outlines the breeding bird survey's findings, local expert knowledge and how their proposed mitigations have influenced species design. Open ground was carefully considered around specific territories and each territory is reviewed in detail. Fourth EIA screening submission 11th March 2024 included an updated 'Curlew Assessment Summary' taking into account additional discussions with RSPB to incorporate more detailed analysis on the number of breeding territories likely displaced or lost. Also included statistics on % open ground within 500m of breeding site. Fifth EIA Screening submission includes updated 'Curlew Assessment Summary' as agreed with RSPB. (30Aug24[redacted]	(13Apr23, email from[redacted] Curlew constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (16.07.24,[redacted] Curlew Assessment noted however this does not consider the cumulative impacts of wind farm proposal. Although wind farm development is under a separate ownership, the Glen Dye Moor project must still consider the cumulative impacts on any species at a catchment level. this assessment should also detail the habitat improvement/management proposed within the project area to maintain favourable alternative habitat. Have RSPB been asked to comment on the curlew assessment as submitted to SF? Noted that predator control is proposed as mitigation however RSPB have questioned the efficacy of this.so more detail required on this and the proposed control plan. Assessment concludes 'less than significant' impact however three territories are noted as being likely lost. While this is within the tolerances of current guidance, further clarification is required around assumed significance of the effect. (17.07.24,[redacted] feedback) Have you fed back to Feughside CC on this issue? 10.09.24 Curlew Assessment V7 - has RSPB been asked to comment on this version and the monitoring prescription? What is the Predator Control Plan and has this considered balance with herbivore prey numbers and browsing damage. What is the prescription for vegetation control as proposed mitigation? Also note as per Glendye Windfarm ornithology data available on ECU website that the windfarm footprint held curlew territories which could be considered alongside woodland creation proposal to to demonstrate whether or not htere is a cumulative impact on curlew as a result of both projects. Further consideration on likely impacts and mitigation required for Pairs 3, 6, 7 and 9. Pairs 5, 6, 10 & 11 may also be impacted by windfarm and as per RPSB comment. See annotated curlew assessment	The mitigation codes listed here relate to this specific topic A09, A10, B09, B10, B17 B18, B24			Curlew: RSPB
48	BIODIVERSITY	Potential impacts on protected species	Potential impacts on badger, bats, otter, pine marten, red squirrel, water vole and wildcat. (SF 07.24)	Badgers, bats, otter, pine marten, red squirrels, water voles and wildcat structures (dreys, roosts, dens, setts, holts, etc) have not been identified within surveys. There were no active territories located within the proposal area. There is an assumption that these species may periodically be present within the region and old signs of presence for badgers and otters were noted along edges to Glen Dye Estate Forest. The proposals to create a varied and diverse new mixed woodland complex which will improve conditions significantly for all of these species providing enhanced habitats for foraging. This has potential to encourage dispersal of these species onto Glen Dye Moor once the proposals have established new woodland and natural regeneration. [redacted]	(16.07.24,[redacted] Supplemental detail required on mitigation and potential impacts on these species which are covered in habitat assessment but not referred to elsewhere. Nil results should be included to demonstrate that species has been considered. Proposal should consider cumulative impacts on distribution and dispersal as appropriate 12.09.24 Otter are SAC qualifying feature. Proposal needs to demonstrate appropriate mitigation in the event that breeding territories are identitified and make provision for pre-commencement work to reduce risks	The mitigation codes listed here relate to this specific topic A09, A10,			UKFS
46	BIODIVERSITY	Protected and sensitive bird species - SEO	Potential impacts on Short-eared Owl (SF 07.24)	Two territories of Short eared owls are present within the proposal area, within one area no planting will occur, within the second territory semi-open native upland birchwood is proposed. This is the recommended woodland type within the breeding bird survey. It was noted within the report that with the implementation of the recommendations, no significant negative impact is expected for the population. (30Aug24,[redacted]	(12.07.24,[redacted] feedback) Supplemental detail required on mitigation and potential impacts on short-eared owl. Species noted on maps but no reference in SOR with regards to distribution across the site and cumulative impacts 12.09.24 Have RSPB/Raptor Study Group been engaged on current design?	The mitigation codes listed here relate to this specific topic A09, A10, B26			UKFS
47	BIODIVERSITY	Protected and sensitive bird species - Goshawk	Potential impact on Goshawk (SF 07.24)	A single probable non-breeding site was identified in the survey within the adjacent Glendye Estate Forest. There are no planting restrictions suggested within the survey though it is expected that woodland creation will encourage distribution of goshawk into Glen Dye Moor once a canopy is formed. (30Aug24,[redacted]	(12.07.24,[redacted] feedback) Supplemental detail required on mitigation and potential impacts on goshawk. Species noted on maps but no reference in SOR with regards to distribution across the site and cumulative impacts (26/7/24,[redacted] feedback) Goshawk is actually in neighbouring woodland and should not be affected but this should be closed off . 16.10.24 SOR should include this line on goshawk as a 'nil result' and to cross-reference with the mapping	The mitigation codes listed here relate to this specific topic A09, A10, B18, B19, B25			UKFS
4	~~LANDSCAPE~~	~~Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)~~	~~Will tree planting around the Cairn o'Mount ... Will it block views? MoP 25.01.23~~	A landscape appraisal will inform the project design to ensure key viewpoints, access corridors and sensitive landforms are taken into account. Clachnaben in particular will be carefully incorporated into the design including the approach paths to ensure the recreational vistas are maintained and a sense of 'enclosure' is not created at key areas. (21Feb23,[redacted]		The mitigation codes listed here relate to this specific topic A15, B27 - B40, C10-C12, D07-D11			UKFS
4	LANDSCAPE	Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)	tree height obscuring views (SF 07.24)						
4	LANDSCAPE	Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)	Ensure access and views/ viewing corridors are maintained. Only plant well back from main access tracks and avoid planting at good viewpoints (NEMT 22Jul22, 8Sept22) (Finzean CC 18Aug22) (South Grampian Wildfire Group 2Sept22) (Community member 12 8Sept22)	A landscape appraisal will inform the project design to ensure key viewpoints, access corridors and sensitive landforms are taken into account. Clachnaben in particular will be carefully incorporated into the design including the approach paths to ensure the recreational vistas are maintained and a sense of 'enclosure' is not created at key areas. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map), a baseline review (with reference to landscape character and designations) and a Landscape Review document. Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map), and a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map. Fourth EIA screening submission 11th March 2024 includes revised EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. New Landscape review part 2 document was added containing visualisations from a sample of the viewpoints. Fifth EIA screening submission 30Aug2024 includes a revised Landscape Review and a revised 3.3.2 Constraints Map Landscape, Cultural Heritage & Recreation. (30Aug24,[redacted]	22.10.24 SF's landscape review feedback is still outstanding, but the Aug 2024 resubmission doesn't consider the phasing of the project and presents the landscape change as a single phase rather than illustrating and assessing Phase 1, Phase 1&2 and Phase 1, 2& 3 as separate instalments as they would be delivered. Mount Shade – planting appears to extend to high up hillside. Does landscape assessment show imagery from most up to date design? Charr bothy images show internal planting. Lack of external viewpoints looking in. Consultation record suggest important views from main road will be considered.	The mitigation codes listed here relate to this specific topic A15, B27 - B40, C10-C12, D07-D11			UKFS
4	~~LANDSCAPE~~	~~Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)~~	~~Will planting around Clachnaben and the approach path occur and create and 'enclosed' landscape? MoP 25.01.23~~	See Note 1.		NA			
4	LANDSCAPE	Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)	Due to some project boundaries being located along rivers, only one side of the river will be planted, looking very unnatural. Where possible, planting beyond the boundary should occur. (DSFB 14Sept22) Work with adjacent landowners on the Aven and Upper Dye to deliver riparian planting on both banks. (DSFB 4Oct23)	Discussions are ongoing with neighbouring landowners and tenants to determine whether joint planting of both sides of the river would be possible. Should this not be possible, planting design will aim to look patchy with open gaps and a feathered edge to avoid creating an unnatural one-sided appearance while still ensuring riparian woodland improvements can be accomplished. (21Feb23,[redacted]) First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map) Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map) Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map. Maps 2, 7, 8 show varied planting design along project boundary with Water of Aven. Fourth EIA screening submission 11th March 2024 includes new Supplemental Appendix 'Glen Dye Moor Water Environment Assessment Summary' highlighting the benefits of riparian planting.	22.10.24 Proposal should evidence discussions with neigbouring landowners/tenants and address this point. Sufficiently details maps should also be provided to illustrate proposed riparian planting where it is not possible to plant both sides	The mitigation codes listed here relate to this specific topic A15, B27 - B40, C10-C12, D07-D11			UKFS
4	~~LANDSCAPE~~	~~Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)~~	~~The Concept Map shows boundaries running up rivers, wont the boundary rivers look unnatural if only one side is planted? MoP 25.01.23~~	See Note 1.		NA			
4	~~LANDSCAPE~~	~~Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)~~	~~Views of the surrounding area are important. Will you only plant well back from main access tracks and avoid planting at good viewpoints? MoP 25.01.23~~	See Note 1.		NA			

4	LANDSCAPE	Planting has the potential to have significant impact on the landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)	A full LVA will need to be produced, the site falls within the Clachnaben and Forest of Birse Special Landscape Area (SLA). (NatureScot 14Sept22)	A landscape appraisal will inform the project design to ensure key viewpoints, access corridors and sensitive landforms are taken into account. Clachnaben in particular will be carefully incorporated into the design including the approach paths to ensure the recreational vistas are maintained and a sense of 'enclosure' is not created at key areas. (21Feb23, [redacted] First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map), a baseline review (with reference to landscape character and designations) and a Landscape Review document. Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map), and a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map. Fourth EIA screening submission 11th March 2024 includes revised EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. New Landscape review part 2 document was added containing visualisations from a sample of the viewpoints. Fifth EIA screening submission 30Aug2024 includes a revised Landscape Review and a revised 3.3.2 Constraints Map Landscape, Cultural Heritage & Recreation. (30Aug24[redacted]	(26/7/24, [redacted] feedback) Need update on discussions. 22.10.24 SF's landscape review feedback is still outstanding, but the Aug 2024 resubmission doesn't consider the phasing of the project and presents the landscape change as a single phase rather than illustrating and assessing Phase 1, Phase 1&2 and Phase 1, 2& 3 as separate instalments as they would be delivered. Mount Shade – planting appears to extend to high up hillside. Does landscape assessment show imagery from most up to date design? Charr bothy images show internal planting. Lack of external viewpoints looking in. Consultation record suggest important views from main road will be considered.	The mitigation codes listed here relate to this specific topic A15, B27 - B40, C10-C12, D07-D11			Visual Impact of planting: NS
5	~~POPULATION & HUMAN HEALTH~~	~~Project area is popular for formal and informal recreational and known to be well used site by multi...~~	~~Can you share more information on the proposals as they develop and how do we get involved? MoP25.01.23~~	See Note 1.	(15.07.24[redacted] feedback) Understood that significant amount of stakeholder engagement has been undertaken to inform development of the project to date and there are plans for community events and involvement as the project develops however it is unclear from the submission as to whether or not stakeholders have been re-engaged with to close off issues. A further round of stakeholder engagement will be required to feedback to all stakeholders and demonstrate how comments have been addressed and incorporated into the project where possible. 10.10.24 See Issue 49, cell I134	NA			
5	~~POPULATION & HUMAN HEALTH~~	~~Project area is popular for formal and informal recreational and known to be well used site by multi...~~	~~Can young people get involved? How will future job options be created at Glen Dye Moor to benefit the next generation? MoP 25 01 23~~	See Note 1.	(17.07.24[redacted] feedback) Noted that there is an option for a socio-economic study to supplement this project. This point should be addressed in that study	NA			
7	WATER	Project has the potential to increase diffuse pollution risk to River Dee SAC	SF 07.24	This is addressed under the SAC section of the issues log. (30Aug24,[redacted]	(17.07.24, [redacted] feedback) A site-specific Diffuse Pollution Control Plan will be required to demonstrate site-specific mitigation measures to avoid or reduce risks of diffuse pollution and sediment entering River Dee SAC and its tributaries. Mapping should be provided as one overview map and a suite of 1 10000 maps to show detail of proposals. 17.10.24 See comments under 'Biodiversity'	The mitigation codes listed here relate to this specific topic A01-A06, C01-C03, D01-D02			SAC: NatureScot
8	CULTURAL HERITAGE	Project has the potential to impact Cairn o'Mount Scheduled Ancient Monument	SAM Cairn o'Mount to be protected during operations and delineated to ensure no damage occurs. (HES 8Sept22)	The Scheduled Ancient Monument (SAM) at Cairn o'Mount sits directly next to the project boundary. An access point to the site is nearby and there may be potential for machinery to stray into the 20m SAM buffer area around the protected site. This will be post marked or taped off prior to operations occurring in this area. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map) a baseline review (with reference to Historic setting) and an Archaeological Survey Second EIA screening submission 17th October 2023, includes a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map. Map 13 makes reference to SAM buffer. Fourth EIA screening submission 11th March 2024, includes updated EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. The Landscape Review also had Part 2 added to it including views from Cairn o'Mount. This shows the fence line was lowered to ensure it was not visible from the SAM looking toward Clachnaben. Fifth EIA screening submission 30th August 2024, includes updated EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. The Landscape Review also now has the full suite of visualisations. We are still pending feedback from Scottish Forestry following the site visit from April 2024 in which landscape issues were discussed on site. This update takes into account site discussions. Note the fence line running over Whitelaw hill is an existing fence line, this will not be relocated as it does not represent a key long view from Cairn o'Mount, all key views have had adjustments. (30Aug24[redacted]	(12.07.24[redacted] feedback) SOR should be clearer that no planting is proposed within 100m of SAM and specify where fence line and access points will be relative to the SAM. It should also consider how landscape backdrop to SAM will be impacted with regards to sense of place 18/07/24 Need to assess fence line, presently shown running right over the crest of Whitelaw's hill which may be visible from SAM and Cairn o Mount 10.10.24 . PLacement of new fenceline to avoid visual impact is noted however no detail in proposal as to how/if old fenceline will be dealt with	The mitigation codes listed here relate to this specific topic B41-B44, C10.3, C11			UKFS
~~8~~	~~CULTURAL HERITAGE~~	~~Project has the potential to impact Cairn o'Mount Scheduled Ancient Monument~~	~~Will Cairn o'Mount be damaged or altered by operations? MoP 25.01.23~~						
9	POPULATION & HUMAN HEALTH	Proposal has the potential to create safety hazards from roadside trees, deer, snow and ice retention	Driver Safety Cairn o'Mount road can see high speed traffic. There are concerns over planting near the road, creating safety hazards from roadside trees, deer, or snow & ice retention. Also concerns over loss of visibility and long views. (Finzean CC 18Aug22)	Any planting near public roads will ensure suitable setbacks to preserve public safety, this will include setback of any fencing to reduce risk of deer being directed onto the road. Key viewpoints will also be considered to ensure scenic quality is maintained for road users. A full Landscape appraisal will aid in designing new planting around public roads. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map), Joint Agency Deer Fence Checklist, and a Landscape Review. These documents include reference to the comments above. Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map), and a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. These documents include reference to the comments above. Sample detailed species maps created and sent to SF. Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map as well as a new Supplemental Appendix 'Glen Dye Moor Recreational Addendum'. These documents include reference to the comments above. Fourth EIA screening submission 11th March 2024 includes revised EIA Constraints Map 'Landscape, Cultural Heritage & Recreation' showing the fence line and fence marking, as well as a new map within the Supplemental Appendix 'Glen Dye Moor Recreational Addendum'. Fifth EIA screening submission 30th August 2024 includes a revised Landscape Review, updated 'Glen Dye Moor Recreational Addendum' including an updated map, revised EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. These maps have also been produced in A1 to allow for detailed viewing. (30Aug24,[redacted]	(29Nov23,[redacted] email to[redacted]...[Maps need to be at] a scale where these features are clearly visible and understandable... (18Dec23,[redacted] to[redacted] These maps are showing the level of detail required. (4Apr24,[redacted] comment at site visit) Planting on both sides of the road outside of fence would reduce visual impact. (15.07.24[redacted] feedback) Detailed fencing map required to demonstrate set -back of fence line for road safety and avoidance of any potential deer-funnelling onto public roads. Landscape assessment should consider sight-lines on public road where appropriate. 10.09.24 Maps 3.2.1-3 noted however please confirm in text in SOR what the setback from the public road will be	The mitigation codes listed here relate to this specific topic C09, D12			UKFS
~~9~~	~~POPULATION & HUMAN HEALTH~~	~~Proposal has the potential to create safety hazards from roadside trees, deer, snow and ice retention~~	~~Will tree planting around the Cairn o'Mount road create driver hazards from roadside trees, deer or snow & ice retention? MoP 25.01.23~~						

10	POPULATION & HUMAN HEALTH	Project area holds several existing recognised access routes	Access Desire to maintain current levels of access. (Community Member 2 31Jul22) (Aberdeenshire Council 10Aug22) (NEMT 8Sept22) (Community member 12 8Sept22) Information (notice boards), signage, waymarked posts, access points (gates), and plans for path and track maintenance should all take into account site specific needs. (NEMT, 7Sept23) North East Mountain Trust will no longer lead on track repair and maintenance, suggested that we contact Outdoor Access Trust for Scotland [OATS]. OATS has engaged with the project and provided path maintenance details. (NEMT 21Sept23) (OATS 06Mar24)	All new fencing is designed to comply with the Outdoor Access Code. Known access points and areas where access may be expected (desire lines) will be provided with gates, additional access infrastructure such as stiles will be provided in areas where access is not expected but may be useful for woodland inspections and management of the site. It has also been recommended that gate location maps are placed at main access points to facilitate loop walks, also suggested are signs placed along fence lines directing cross country or winter users to access infrastructure. (21Feb23, [redacted]) First EIA screening submission 3rd March 2023 includes descriptions of all access points, signs and gates within the Issues Log and EIA Screening Request Form. Second EIA screening submission 17th October 2023, included a new 'Constraints Map Landscape, Cultural heritage & Recreation', New responses were also added to the consultation summary. Third EIA screening submission 31st January 2024 includes a new appended 'Glen Dye Moor Recreational Addendum'. Fourth EIA screening submission 11th March 2024 includes an updated 'Constraints Map Landscape, Cultural Heritage & Recreation', and revised 'Glen Dye Moor Recreational Addendum' which includes a new Recreational Analysis Map to outline existing recreational uses, assets, gates and proposed indicative signage. Three new maps are also provided 'EIA Screening Request New Infrastructure Maps' (North, South, West), which displays route of fence line and includes new road locations (note roads are also displayed on EIA Screening Request Species Map dated 22Feb2023). Issues Log also updated, see comment below. Way marker posts will be a combination of tall finger posts and smaller bollard posts to continue the appearance of a 'wild' western side of the moor. Access along the main path to the Clachnaben Summit will be maintained. (11Mar24, [redacted]	(13Apr23, email from [redacted] Provide more detailed information on what will be provided. (29Nov23, email from [redacted] Access needs to be shown at a scale where the features are clearly visible and understandable. (26Feb24, email from [redacted] Provide detailed map and explanation of what will be provided now and in the future. (31May24, [redacted]) There is no map showing the line of the deer fence. This section [Recreational Addendum] is weak (3 pages) and it does not cover the breadth of our discussions or the ambition set out in the Par Equity Vision for the project. It uses imprecise language which does not make it clear what will actually be delivered, and therefore we cannot make an assessment of the impact at this stage. It does not describe what will additionally be provided and does not demonstrate benefits for the community. This area is heavily used for recreation, and we expect that this part of the scheme will receive a lot of interest. (5June24, notes by [redacted] from meeting with [redacted] Add quantifiable outputs into application e.g. gates, car parking spaces, etc. (15.07.24, [redacted] feedback) It is recognised that the project area is already providing a significant draw for a number of user-groups and is well-used as documented by the stakeholder engagement to date. The proposal currently fails to sufficiently detail the impact of the scheme on a highly used site and to detail how the comments received at the initial consultation stage have been incorporated into the design. It also needs to include sufficient detail around what will be enhanced (e.g. provision of adequate car parking spaces - this will be essential to support access across the site and) and where there will be additional public benefit through the provision of new trails and infrastructure. (e.g. waymarking and directional signs should be mapped). The future aspiration to provide new trails in the future is noted however there is significant scope within the site to create more trails now by linking up existing desire lines and informal paths and deliver immediate public benefit. The proposal should also consider the potential for further opportunities for community involvement and skills training. Access route proposals should also consider where access needs to be managed to protect sensitive habitats/sites and divert footfall. The use of stiles will also not be appropriate in the vast majority of locations as they do not facilitate all-user use. If a location is considered to merit a stile, this should be justified under the SOAC and will require further engagement with stakeholders. A follow-up stakeholder engagement exercise will be required to update stakeholders on the proposed access provision. 10.10.24 Further stakeholder engagement on access provision is still required. Car park provision for 12 cars is not acceptable for a scheme of this size and it is of concern that the proposals do not intend to encourage increased use of the site. NOted that stakeholder feedback has suggested that formal new trails would	The mitigation codes listed here relate to this specific topic B46, C04-C09, D14, E07-E16			UKFS
~~10~~	~~POPULATION & HUMAN HEALTH~~	~~Project area holds several existing recognised access routes~~	The track down to Charr bothy from the Hill of Edendocher and also the track running west of the Hill of Edendocher go through veritable canyons with exposed steep vertical slopes of peat over 2m deep, which is eroding badly. Restoration of these areas, while presumably retaining the access track will be difficult. You have talked of reprofiling. Will this be sufficient? In the course of time, we would like to see further details of how this work will be done. NEMT Sept 2022	This was raised at a joint consultation event for peatland restoration and woodland creation. This issue has been carried forward by the peatland project as it relates exclusively to peatland methodologies and operational work and will be assessed against the EIA Regulations and Planning Framework headed by NatureScot and Aberdeenshire Council as part of a Peatland Action project. No further information is provided for the EIA Screening being requested under the Forestry EIA Regulations assessment and the FGS proposals. Woodland Creation proposals will have no impact related to this key issue nor is there potential for cumulative impacts in this instance.	(16.07.24, [redacted] feedback) There are no specific references to this track in the proposal. Have you considered how to manage this track and shared details with NEMT as requested? Proposal should provide a full specification for all path upgrades and mitigation as appropriate. 16.10.24 This would appear to relate to the land parcels under separate ownership and designated as 'Biodiversity Net Gain' areas for the adjacent windfarm. The SOR needs to clarify and describe this project and demonstrate the relationship between both projects.	No mitigation required			
~~11~~	~~POPULATION & HUMAN HEALTH~~	~~Project area has the potential to expand access infrastructure and opportunities~~	~~Are you looking at linked activities complimenting each other, such as cycling/access activities around Craig of Dalfre? What about linking paths between Clachnaben and other parts of the property? MoP 25.01.23~~	As noted previously, no new trails will be constructed as part of these proposals. Other public benefits are being realised through other proposals including car park improvements, trail maintenance, installation of waymarked posts and other signage.	(17.07.24, [redacted] feedback) See comment on issue 10 Population & Human Health - proposal should consider additional access and recreational opportunities in more detail. 16.10.24 Car park provision for 12 cars is not sufficient for a scheme of this size and would not be a significant upgrade to current provision. Proposal still misses opportunity to further facilitate new access and appears to risk loss of some exisiting informal routes.	The mitigation codes listed here relate to			UKFS
~~11~~	POPULATION & HUMAN HEALTH	Project area has the potential to expand access infrastructure and opportunities	Linking paths between Clachnaben and other parts of property SF 07.24					
3	BIODIVERSITY	Protected and sensitive bird species - curlew ~~/ other raptors~~ Awaiting comment from RSPB on revised information. (30Aug24, MP)	Birds High density breeding curlew should be buffered from planting (500m). (RSPB 12Sept22) Wader guidance is available and should be followed. (NatureScot 14Sept22) Ensure the populations of red listed waders will remain in good numbers. (Feughside CC 18Sept22) Potential for issues with accumulative effect. Loss of alternative habitat for curlew should be considered. Recognise some pairs will be displaced, potentially lost. (RSPB 18Sept23) Waders may be displaced and potentially lost but this is an opportunity to monitor the response of curlew to a landscape scale change. (RSPB 04Apr24)	Woodland creation and peatland restoration designs will take into account results from breeding bird surveys. This will ensure that where significant wader populations are present, these are suitably protected from disturbance or habitat change. (21Feb23, M[redacted] First EIA screening submission 3rd March 2023 includes a habitats and species survey. Second EIA Submission 17th October 2023 included a new 'EIA Constraints Map – Wildlife' showing breeding territories. Third EIA screening submission 31st January 2024 included a new suite of detailed 1 10,000 'EIA Screening Waders Maps 1-16' with annotations noting mitigations included in the design. A new appendix was also created, 'Curlew Assessment Summary' which outlines the breeding bird survey's findings, local expert knowledge and how their proposed mitigations have influenced species design. Open ground was carefully considered around specific territories and each territory is reviewed in detail. Fourth EIA screening submission 11th March 2024 included an updated 'Curlew Assessment Summary' taking into account additional discussions with RSPB to incorporate more detailed analysis on the number of breeding territories likely displaced or lost. Also included statistics on % open ground within 500m of breeding site. Fifth EIA Screening submission 30th August 2024 includes updated 'Curlew Assessment Summary' as agreed with RSPB. Consultation with RSPB has continued throughout the development stage and final woodland design has been agreed as not significantly compromising the population of curlew on site. Review of the neighbouring 'Glendye Wind Farm AI 2021 Appendix 3.2 Outline Biodiversity Net Gains Management Plan for Glendye Wind Farm' confirms that alterative habitat areas will be enhanced for waders on adjacent land. A full monitoring programme is currently in draft form covering the entire property and includes projects out with the scope of afforestation. (30Aug24, [redacted]	(13Apr23, email from [redacted] Curlew constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (16.07.24, [redacted] feedback) Curlew Assessment noted however this does not consider the cumulative impacts of wind farm proposal. Although wind farm development is under a separate ownership, the Glen Dye Moor project must still consider the cumulative impacts on any species at a catchment level. this assessment should also detail the habitat improvement/management proposed within the project area to maintain favourable alternative habitat. Have RSPB been asked to comment on the curlew assessment as submitted to SF? Noted that predator control is proposed as mitigation however RSPB have questioned the efficacy of this so more detail required on this and the proposed control plan. Assessment concludes 'less than significant' impact however three territories are noted as being likely lost. While this is within the tolerances of current guidance, further clarification is required around assumed significance of the effect. 12.09.24 Appendix 3.2 noted however proposal doesnt make it clear that peatland restoration as part of windfarm mitigation proposal will take place in addition to peatland work within the screening boundary. Proposal should consider if this further off-sets loss/disturbance of territories within planting footprint. SOR isnt clear on whether or not RSPB have been asked to comment on August 2024 Curlew Assessement and have agreed with proposed design	The mitigation codes listed here relate to this specific topic A09, A10, B09, B10, B17 B18, B24			Curlew; Predator Control Plan :RSPB
3	BIODIVERSITY	Protected and sensitive bird species - curlew ~~/ other raptors~~	Significant Population Loss - in a case study setting a loss of more than 5 pairs triggers an objection from RSPB. However, in projects of this scale, they recognise it is impossible to save every pair. There are other factors to consider, it is about doing as much as you can with what is available. At Glen Dye Moor the biodiversity is likely to improve from what was there before anyway. Consider alternative habitat where the birds could move into. At Glen Dye there could be issues with accumulative effect, esp. if the wind warm is approved. Recognise that this is a separate ownership and therefore out of our control. (RSPB/SWL meeting Sept 2023)				The mitigation codes listed here relate to this specific topic A09, A10, B09, B10, B17 B18, B24			
12	~~BIODIVERSITY~~	Project has potential to increase wildlife disturbance	Access Access should be balanced between wildlife and use. (Community Member 4 19Aug22)	Additional signage is being considered to advise visitors of the sensitive time of year for wildlife and guidelines to avoid disturbance of sensitive species. These signs would likely be placed at main entrances. Through improving habitat for wildlife on site, it is hoped that sensitive wildlife populations will have more available high-quality habitat and space in which to expand, making the wildlife populations more resilient to current visitor use levels. Opportunities to screen sensitive wildlife sites from disturbance or re-route some walking routes to avoid sensitive areas during breeding and nesting seasons will be integrated into key locations. (21Feb23, [redacted] See mitigation regarding peregrine falcon at slack of dye. Threshold signs are identified on maps, these will include notes on wildlife constraints and good practice for site visitors. (30Aug24, [redacted]	(17.07.24, [redacted] feedback) Site holds several protected and scheduled species. Access provision should detail existing and proposed routes relative to these interests and consider whether or not it is appropriate to re-route or screen to avoid disturbance or damage. This should be included as part of the Screening Opinion which should also detail operational mitigation and ongoing visitor management plan to avoid repeated disturbance or damage 12.09.24 A09 should apply here too. Can you map these sensitive sites where screening or re-routing will be required? Peregrine not mapped on raptor maps. More detail required on visitor management	The mitigation codes listed here relate to this specific topic B11, E12			UKFS
~~12~~	~~BIODIVERSITY~~	~~Project has potential to increase wildlife disturbance~~	~~Visitors can disturb wildlife, how will access be balanced wildlife and use of the site by people? MoP 25.01.23~~					

49	CLIMATE	Project has the potential to increase risk of wildfire	Wildfire Visibility of the wildfire management plan is requested. (NEMT 8Sept22) Ensure fire signage advising of current risk levels is kept accurate across the year. (NEMT 7Sept23)	A Wildfire Management Plan is being prepared for the property. In part, this is to ensure risk from wildfire to newly planted trees is reduced to the greatest extent possible. Key findings of the Wildfire Management Plan will be added to the Glen Dye Moor website. Consideration is being given to making the entire technical plan available through this has not yet been confirmed. (21Feb23,[redacted] Fourth EIA screening submission 11th March 2024 includes an updated 'Glen Dye Moor Recreational Addendum' which includes a new Recreational Analysis Map displaying the location of proposed fire warning sign in Spital Car Park which will advise users of the current levels of risk. A Wildfire Management Plan remains in development. (30Aug24,[redacted]	(15.07.24, [redacted] feedback) Wildfire Management Plan required 16.10.24 [Note - previously under 'Population' header and moved to 'Climate'] Wildfire Management Plan noted as still outstanding	The mitigation codes listed here relate to this specific topic B20, C06, C15, E04, E11			Wildfire Management
~~13~~	~~POPULATION & HUMAN HEALTH~~	~~Project has the potential to increase risk of wildfire~~	~~Can we see the Wildfire Management Plan? MoP 25.01.23~~						
14	LAND - ~~We had this down as Population & Human Health~~	Project will effect a significant land use change	Wording changed from previous KIL —> Employment Some job losses have occurred on this site, There are sensitivities associated with this and it would be good to understand your thoughts around the proposed 'significant' job opportunities you have indicated there would be. It would be very helpful if the community could understand what opportunities might arise, for how long, and for what skill levels? Will there be an opportunity for local residents to apply? more details on job opportunities should be provided and how to apply. (Feughside CC 18Sept22)	A change in land use for such a large area will necessitate a change in management activities and the people needed to support those activities. The diversity of proposals including native woodland expansion, commercial conifer planting, peatland restoration and a variety of community projects represents a significant amount of work which will be created in the short term as well as future ongoing work as part of commercial forest management which will be sustained over a longer period of time. Local resources will be utilised as much as possible both to improve sustainability of the project as well as contribute to the local rural economy. A broad socio-economic review of the project is being considered and a summary of this will be made available in future once the final proposals have been designed. (21Feb23,[redacted]) Fifth EIA screening Submission 30th August 2024 includes a revised EIA Screening request form introduction noting rural economy, employments and skills training. (30Aug24,[redacted]	(12.07.24,[redacted]eedback) Noted that this project is beyond the scope of WEAG however it does propose a significant land use change over 6,360ha and must address the impacts of this at a local, regional and national level. A socio-economic review of the project would be highly-recommended to quantify these impacts 12.09.24 What is the baseline for site and recent emploment stats? Describe LCA and confirm that site has no agricultural activity and therefore land use change not relevant to WEAG to evidence this.	The mitigation codes listed here relate to this specific topic F03			UKFS
~~14~~	~~LAND~~	~~Project will effect a significant land use change~~	~~How will job losses compare to job gains for these proposals? Will these projects benefit the local rural economy? MoP 25.01.23~~						
14	LAND - ~~We had this down as Population & Human Health~~	Project will effect a significant land use change	Rural economy Inclusion of commercial planting provides future/ongoing local employment. Local contractors should be used as much as possible during implementation. (Gresham House 29Jul22)						
15	BIODIVERSITY	Project has the potential to impact existing woodland	Natural regeneration should be a prime focus for new woodland (Aberdeenshire Council 10Aug22) (NEMT 8Sept22)	There is preference to include natural regeneration where seed sources of the desired species are present (generally within 50m) and where regeneration can be expected within a five-year period in order to accomplish afforestation targets within required timeframes. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 did not include areas proposed for natural regeneration on the Species Map. Second EIA screening submission 17th October 2023, included a full suite of detailed species maps included areas proposed for natural regeneration. Fifth EIA screening Submission 30th August 2024 includes a Supplemental Seed Source Map which details existing levels of Natural Regeneration, location of existing seed trees, and displays location of NWSS woodlands. All stocking requirements will meet FGS eligibility for natural regeneration within claim year guidelines. (30Aug24,[redacted]	(10May23, meeting notes by [redacted] of [redacted] comments) Map out the areas where seed source is not on the NWSS. (15Jan24, notes from meeting with [redacted] Prove through plots and photos the presence of natural regeneration currently on site. (26/07/24,[redacted] feedback) Extensive areas of regeneration are shown but little detail provided on seed source, timescale and stocking. 22.10.24 Brocky Burn – highlighted as highest priority in Marine Scotland National Marine Plan Interactive mapping for tree planting prioritisation but the current proposal only offers an initial 20-40m buffer and relies on natural regeneration to extend woodland cover up to higher elevations despite acknowledging that shading is vital for mitigating temperature increase. Are there seed sources at higher elevations to support this?	The mitigation codes listed here relate to this specific topic A12, B01, B03, B06, B28, B39, C15, D08, F4			UKFS
~~15~~	~~BIODIVERSITY~~	~~Project has the potential to impact existing woodland~~	~~What are your plans for allowing maximum natural regeneration as opposed to planting? MoP 25.01.23~~						
16	BIODIVERSITY	Project has the potential to impact riparian corridors of River Dee SAC and its tributaries	River Dee Special Area of Conservation (SAC) appropriate planting and management of riparian areas. Prevention of diffuse pollution. (NatureScot 14Sept22) Email sent to NatureScot asking for additional comment, awaiting response. (30Aug23,[redacted]	Full extent of the River Dee SAC will be shown on operational maps. Site specific mitigations will be included within contracts during implementation to ensure diffuse pollution is suitably planned for and controlled during operations. Design elements will be incorporated into woodland proposals to ensure that appropriate buffers are created around the SAC. Within these buffers where there is opportunity, riparian enhancement work will be carried out such as bankside native woodland creation using suitable species or encouraging natural regeneration of trees through reduction of deer browsing pressure. Details of design elements are included within the Operational Plan for new woodland creation. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes a 'Baseline Assessment & Summary Table' noting presence of SAC, designated features and their condition status along with SEPA River Conditions for named watercourses. Second EIA screening submission 17th October 2023, included an updated 'EIA Screening Request Species Map' showing detailed species design around the SAC, a new 'EIA Constraints Map – Habitats & Water' highlighting all water sensitives. Third EIA screening submission 31st January 2024 included a new 'Water Environment Assessment Summary' to explain how water assets have influenced planting design. Fourth EIA screening submission 11th March 2024 Updated the Water Environment Assessment Summary to include a section on Riparian Woodlands and greater detail in the GWDTE section. Fifth EIA screening submission 30th August 2024 includes and expanded Water Environment Assessment detailing the measures being carried out around highlighted areas such as Greendams and the River Dee SAC. The incorrect percentages have been removed. A diffuse pollution control strategy has been prepared though it is noted that site specific measures can only be appropriately planned at the time of operational tendering to ensure winter working is managed appropriately based on the timing, site conditions, type of	(10May23, notes from meeting with [redacted] Montane scrub element would be appropriate. (7Nov23, email from [redacted] Require detailed scheme maps showing the scheme, integration of the survey and consultation information. Screining request should not have any appendices attached and all information should be on the form. Provide scheme maps showing planting/species design incorporating and explaining the mitigation measures at an appropriate scale to showcase details. (26Feb24, email from [redacted] Worth having a look at the Sitka planted on Greystone Hill as it has struggled. (21Mar24, email from [redacted] Good to include some aspen into the species mix. (31May24, email [redacted] Need more detail than is provided in the maps, prescriptive (10-20m) rather than following land form. More site-specific detail required on mitigation for salmonids within the design of the planting scheme, particularly given the SAC status of the River Dee . Figures for the % increase in riparian woodland are wrong. Species maps need more detail – especially around riparian woodland – we have provided comment on species choice (SS and Aspen). Open ground – how will this be maintained? (5June24, notes from meeting with [redacted] Specify species mixtures in the application. (17.07.24[redacted] feedback) The inclusion of around 241hectares/66,134km of riparian woodland is very welcome and has the potential to bring huge environmental benefits however as already requested much more site-specific detail will be required to allow us to give an Opinion . Furthermore, before any EIA Screening Opinion can be given, Scottish Forestry need to complete the HRA for all projects relating to the River Dee SAC and its tributaries. This will require all of the operational detail and site-specific mitigation proposed to demonstrate how the project will manage and reduce risks to qualifying species. It should also include full details of new riparian woodland (species, density, NVC type, ground preparation, use of fertiliser etc.) and areas proposed for natural regeneration. Watergates should be mapped to demonstrate potential impacts for flood management. Water crossings should also be identified and the impacts of road building/upgrade and required mitigation should also be included. Species choice and planting design should consider opportunities to provide significant riparian corridors and introduce more shading of watercourses, increase bankside stability and increase insect-drop. Existing woodland cover should be protected within the design and species choice should consider opportunities to expand NVC type. A site-specific Diffuse Pollution Control Plan will be required to demonstrate site-specific mitigation measures to avoid or reduce risks of diffuse pollution and sediment entering River Dee SAC and its tributaries. Mapping should be provided as one overview map and a suite of 1 10000 maps to show detail of proposals. 18/07/24 Green dams has been highlighted as being of special significance to Salmonids and an in depth species/planting map will be required. 17.10.24 This is still lacking site-specific detail. More site-specific detail across the whole extent of the riparian zone is required as per previous comments. Comment from NS provided on 11.10.24 does not sufficiently discharge all issues regarding design and mitigation. Potential for great number of impacts – siltation /erosion /nutrification / disturbance / pollution / ground prep / machines in burn etc. Site specific pollution prevention control plan requested but not provided. Brocky Burn – highlighted as highest priority in Marine Scotland National Marine Plan Interactive mapping for tree planting prioritisation but the current proposal only offers an initial 20-40m buffer and relies on natural regeneration to extend woodland cover up to higher elevations despite acknowledging that shading is vital for mitigating temperature increase. Are there seed sources at higher elevations to support this? One of the key public benefits of this project is to provide extensive riparian cover to mitigate water temperature increase and the project should seek all opportunities to do this across the site. The Marine Scotland mapping is a good resource for this type of analysis	The mitigation codes listed here relate to this specific topic A06, B01, B03, B05, B06, B08, C01, C02, D01			Diffuse Pollution Control; Riparian woodland design and composition NS SEPA DSFB
16	BIODIVERSITY	Project has the potential to impact riparian corridors of River Dee SAC and its tributaries	Species choice Minimum 5% native species increased to 10% and riparian buffers maintained creating native network corridors of 25-30m in width. Where practical willow and alder to be planted on the bank toe/face and close to the water edge, providing significant shade, insect drop, bank stability and instream cover from their roots. (DSFB 14Sept22)	New woodland is designed to ensure the right tree is planted in the right place, taking into account the climate, soils, topography and other sensitivities such as cultural heritage, visual amenity or wildlife populations. Scottish Woodlands Ltd will design new woodland areas based on all of the site survey information and following consultation with stakeholders. The final design will be discussed and agreed with Scottish Forestry to ensure it meets all of the regulatory requirements. Approximately one third of the project area will be productive conifer though within this conifer plantation there will still be a certain percentage of native species. The Forestry Grant Scheme guidance requires a 5% to 10% native component and the planting design for this productive area will aim to plant closer to the 10% native woodland threshold where this is appropriate. To avoid potential negative impacts from conifer plantations such as acidification, productive forests will be planted in areas which create connections with neighbouring plantations, are suitable to the species chosen, and have appropriate buffers from sensitive areas such as watercourses and Ground Water Dependent Terrestrial Ecosystems (GWDTEs). Forest design will follow current guidelines and best practice principles of UKFS which will promote diverse and resilient forests with high levels of biodiversity. The remaining two thirds of the afforestation area will be native woodland including areas of Natural Regeneration. Native woodland types, such as Caledonian pinewood (W18) and upland birch (W4), will be chosen based on each plating site and the conditions found there. In all riparian areas willow and alder will be planted close to riverbanks where this is appropriate. All riparian areas will be planned for enhancement where feasible in line with current guidelines, best practice, and regional initiatives such as the Riverwood Initiative. Standard minimum protection buffers from watercourses will be expanded where this improves protection of site sensitivities. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes an 'EIA Screening Request Form' noting the species percentages and overarching design of 1/3 native 2/3 conifer, 'EIA Screening Request Species Map', consultation summary including a 'Sensitivity Map' and 'Concept Map', and a 'Landscape Review' was also		The mitigation codes listed here relate to this specific topic A06, B01, B03, B05, B06, B08, C01, C02, D01			

16	BIODIVERSITY	Project has the potential to impact riparian corridors of River Dee SAC and its tributaries	Ratio of native woodland to conifer plantation 1 3. (Feughside Community Council 18Sept22) (Community Member 1 29Jul22) (Community member 12 8Sept22)	completed describing the design elements to be incorporated. Second EIA screening submission 17th October 2023, included an updated 'EIA Screening Request Species Map' and new Constraints Maps for 'Habitats & Water', 'Landscape, Cultural Heritage & Recreation', and 'Wildlife'. Third EIA screening submission 31st January 2024 included a new detailed 'EIA Screening Species Design Maps 1-16' at 1 10,000 scale allowing detailed viewing of species design with annotations noting specific design elements and where they have been incorporated. Three new sets of 16 maps were also produced for 'Raptors', 'Waders', and 'Other Wildlife'. Revised 'EIA Screening request Form' includes more details on the assessment process and how mitigations have incorporated these findings. At this time it was also agreed that appendices were required and a new suite of four appendices were included to better illustrate the analysis and integration of the survey and consultation information to the design of the project, these included 'Glen Dye Moor Curlew Assessment Summary', 'Glen Dye Moor Merlin Assessment Summary', 'Glen Dye Moor Recreational Addendum', and 'Glen Dye Moor Water Assessment Summary'. Fourth EIA screening submission 11th March 2024 Updated the above documents and added a new map to the 'Glen Dye Moor Water Environment Assessment Summary' which showed the standard buffers and highlighted the riparian areas around watercourses and the proposed increases in riparian woodland cover, as well as adding a new Landscape Review Part 2 showing example visualisations from a subset of key viewpoints. This latter addition was aimed at preparing for a site visit with Scottish Forestry's Landscape Architect.		The mitigation codes listed here relate to this specific topic A06, B01, B03, B05, B06, B08, C01, C02, D01			
16	BIODIVERSITY	Project has the potential to impact riparian corridors of River Dee SAC and its tributaries	Productive conifer planting should not exceed the 1/3 concept design to reduce risk of acidification and reduced biodiversity. (DSFB 14Sept22) (Feughside CC 18Sept22)			The mitigation codes listed here relate to this specific topic A06, B01, B03, B05, B06, B08, C01, C02, D01			
16	BIODIVERSITY	Project has the potential to impact riparian corridors of River Dee SAC and its tributaries	Opportunity to challenge standard riparian practices to produce high quality good riparian zone habitats. (SEPA 18Aug22)			The mitigation codes listed here relate to this specific topic A06, B01, B03, B05, B06, B08, C01, C02, D01			
~~16~~	~~BIODIVERSITY~~	~~Project has the potential to impact riparian corridors of River Dee SAC and its tributaries~~	~~How will the River Dee Special Area of Conservation be protected? MoP 25.01.23~~			NA			
17	WATER	Project has the has the potential to impact water quality	Prevention of diffuse pollution. (NatureScot 14Sept22, 16Nov23)	New access tracks will avoid sensitive areas wherever possible, including areas of deep peat. All new tracks will be carefully planned to include preoperational diffuse pollution strategies as well as diffuse pollution management mitigations during operations to ensure that organic compounds do not reach surface waters. The fifth EIA screening submission 30th August 2024 now includes a revised New Infrastructure Map with an inset details showing the constraints present in and around the road construction areas. A Road Specification annex has also been added along with a Diffuse Pollution Control Strategy. No new drains are proposed as part of the afforestation works.(30Aug24, [redacted])	(17.07.24, [redacted] eedback) A site-specific Diffuse Pollution Control Plan will be required to demonstrate site-specific mitigation measures to avoid or reduce risks of diffuse pollution and sediment entering River Dee SAC and its tributaries. Mapping should be provided as one overview map and a suite of 1 10000 maps to show detail of proposals. (17.07.24, [redacted] feedback) Further detail required on soils and deep peat relative to new road proposals. Operational detail required for construction stage and ongoing management to prevent risks of sediment release into watercourses. Diffuse Pollution Control Plan required and all site-specific mitigation should be mapped at 1 10,000 to review. Proposal should also cover the need for new drainage across the site. 08.10.24 Site-specific detail on soil still not provided	The mitigation codes listed here relate to this specific topic A03, D02			Diffuse Pollution Control: NS SEPA DSFB
~~17~~	~~WATER~~	~~Project has the has the potential to impact water quality~~	~~Will tracks be built on peat and will they cause erosion? (sedimentation risk) MoP 25.01.23~~	See Note 1.		NA			
18	BIODIVERSITY - We have this issue down as Water	Project has the potential to impact aquatic species	The Burn of Greendams feeds into an important salmon and sea trout spawning / nursery area. Riparian buffers above the minimum UKFS guidelines are recommended for productive conifer planting. (DSFB 14Sept22) Assessment and planting proposal is appropriate and would be beneficial to the river environment, biodiversity and climate resilience. (DSFB 04Oct23)	The Burn of Greendams and its headwaters currently have higher levels of native woodland cover, this existing riparian corridor will be extended further up the watercourses . (21Feb23, [redacted]) First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map). Second EIA screening submission 17th October 2023 included new detailed species maps (EIA Screening Species Design Maps 1-16) and a new 'EIA Constraints Map- Habitats & Water'. Third EIA screening submission 31st January 2024 included a new Water Environment Assessment Summary to explain how water assets have influenced planting design. Fourth EIA screening submission 11th March 2024 updated the Water Environment Assessment Summary to include a section on Riparian Woodlands and greater detail in the GWDTE section. (04Mar24[redacted] Fifth EIA screening submission 30 August 2024 includes a revised Water Environment Assessment Summary which corrects the % increase figures and now includes a detailed infographic of Greendams which shows the riparian benefits of the proposal. This update has been shared with DSFB as well as NatureScot. Detailed 1 10,000 Species Maps have also been updated.(30Aug24, [redacted])	(26Feb24, notes from phone call with [redacted] Highlight key areas such as "Greendams" and "other areas" where mitigations are going beyond the standards. (31May24, email from [redacted]) More assessment can be added relating to the benefits to salmonids. (31May24) Need more detail than is provided in the maps, prescriptive (10-20m) rather than following landform. More site-specific detail required on mitigation for salmonids within the design of the planting scheme, particularly given the SAC status of the River Dee. Figures for the % increase in riparian woodland are wrong. (15.07.24, [redacted] feedback) As requested, proposal should include a section on site-specific mitigation for aquatic species to demonstrate how it will support these species. This should be supplemented with detailed mapping of proposed riparian woodland. Updated proposal should also be shared with DSFB. (15.07.24, [redacted] feedback) As requested, proposal should include a section on site-specific mitigation for aquatic species to demonstrate how it will support these species. This should be supplemented with detailed mapping of proposed riparian woodland. Updated proposal should also be shared with DSFB. 10.10.24 Assume response from DSFB is also still outstanding? Infographic on Greendams is noted however site specific detail is required across the site as as per previous comments	The mitigation codes listed here relate to this specific topic B07			UKFS
18	BIODIVERSITY	Project has the potential to impact aquatic species	River Dee and its catchment support populations of salmon, trout, eel and brook, river and sea lampreys (DSFB Sept 22) River Feugh and Dee hold freshwater pearl mussels (Feughside CC Sept 2022) The closest freshwater pearl mussel records we have are for mussels in the Water of Feugh. We do not hold any records of pearl mussels from the Water of Dye or any other watercourses within the proposal area or immediately downstream. However, we have not surveyed these watercourses. As noted above, provided appropriate measures are in place during any delivery phase, the proposals should not affect any mussels present within these watercourses. (NS Sept 2022)	Following consultation with NatureScot, it was determined that freshwater pearl mussels are not within an ecologically significant distance and do not require specific mitigation. Scottish Woodlands attended a Feughside Community Council Meeting, noted within the consultation summary , and presented an update on the proposals and responses to issues raised by the community.(30Aug24, [redacted]	(16.07.24, [redacted] feedback) Feughside CC have specific request on freshwater pearl survey work which does not appear to have been responded to. 10.10.24 Assume this is a reference to FCC meeting of 27th APril 2023. Are there any notes or action points from this meeting to close off enagement around this point?	The mitigation codes listed here relate to this specific topic B07			UKFS
16	BIODIVERSITY	Project has the potential to impact riparian corridors of River Dee SAC and its tributaries	appropriate planting and management of riparian areas. Prevention of diffuse pollution. (NatureScot 14Sept22, 16Nov23)	See notes above relating to other water environment topics.	(17.07.24, [redacted] feedback) The inclusion of around 241hectares/66,134km of riparian woodland is very welcome and has the potential to bring huge environmental benefits however much more site-specific detail will be required to allow us to give an Opinion. Furthermore, before any EIA Screening Opinion can be given, Scottish Forestry need to complete the HRA for all projects relating to the River Dee SAC and its tributaries. This will require all of the operational detail and site-specific mitigation proposed to demonstrate how the project will manage and reduce risks to qualifying species. It should also include full details of new riparian woodland (species, density, NVC type, ground preparation, use of fertiliser etc) and areas proposed for natural regeneration. Water crossing should also be identified and the impacts of road building/upgrade and required mitigation should also be included. Species choice and planting design should consider opportunities to provide significant riparian corridors and introduce more shading of watercourses, increase bankside stability and increase insect-drop. Existing woodland cover should be protected within the design and species choice should consider opportunities to expand NVC type. A site-specific Diffuse Pollution Control Plan will be required to demonstrate site-specific mitigation measures to avoid or reduce risks of diffuse pollution and sediment entering River Dee SAC and its tributaries. Mapping should be provided as one overview map and a suite of 1 10000 maps to show detail of proposals. 17.10.24 See previous comment on issue 16	The mitigation codes listed here relate to this specific topic A06, B01, B03, B05, B06, B08, C01, C02, D01			Diffuse Pollution Prevention NS SEPA DSFB
~~16~~	~~BIODIVERSITY~~	~~Project has the potential to impact riparian corridors of River Dee SAC and its tributaries~~	~~The Burn of Greendams in an important salmon and sea trout river, will it be specially protected?~~	See Note 1.		NA			

19	BIODIVERSITY	Project has the potential to impact Merlin	Birds Merlin use this area as an important breeding area. Long term research covering this population should be referred to and published mitigations followed. Ongoing monitoring is recommended to evaluate impact of the habitat change. (RSPB 12Sept22) (Local Raptor Group 12Sept22) Maintain the 'breeding areas' through appropriate species design. (Local Raptor Group 10Jan23) Each territory to be assessed individually against the species design. More generally, leave open ground where reasonable, especially where it can be linked into surrounding open ground. (Local Raptor Group 31Aug23) Territories require corrections, one territory has been omitted from the map. Recommendation of around 50% open ground within territories appears viable. Breeding areas Q and N appear to be the most likely to be lost unless some amendments are made. (Local Raptor Group 07Mar24)	Planting designs have been designed in response to the findings of the Breeding Bird Survey and initial conversations with local Merlin researchers. Further design changes are required and a meeting with local Merlin researcher, [redacted] has been planned. (3Nov22, [redacted]) Development of the planting design through consultation [redacted] to maximise potential for positive outcomes. Previous woodland designs have yielded valuable information on how Merlin populations respond to afforestation in this region and learning points are being used to design a more sympathetic woodland. Ongoing research will be encouraged on site. (21Feb23 [redacted] First EIA screening submission 3rd March 2023 includes a habitats and species survey. Second EIA Submission 17th October 2023 included a new 'EIA Constraints Map – Wildlife' showing breeding territories of raptors including merlin. Third EIA screening submission 31st January 2024 included a new suite of detailed 1 10,000 'EIA Screening Raptors Maps 1-16' with annotations noting mitigations included in the design. A new appendix was also created, 'Merlin Assessment Summary' which outlines the breeding bird survey's findings, local expert knowledge and how their proposed mitigations have influenced species design. Open ground was carefully considered around specific territories and each territory is reviewed in detail. Fourth EIA screening submission 11th March 2024 included an updated 'Merlin Assessment Summary' taking into account additional discussions with [redacted]. Fifth EIA screening submission 30th August 2024 includes an updated 'Merlin Assessment Summary' now shows agreed accurate territories and describes the planting composition including additional open ground where possible, including around territory N, though displacement is still possible. Additional comment has	(13Apr23, email from [redacted]) Merlin constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (16.07.24, [redacted] feedback) merlin assessment noted however this details that of the 11 territories only two are unlikely to be impacted. This does not correlate with statement on overall impact being less than significant. No detail on operational mitigation to avoid disturbance. Bird report also recommends only low-density NBL within 300m of territories and this does not appear to have been included for all territories (note assessment mapping would benefit from a legend to identify planting types). (18/07/24, [redacted] feedback) Not all territories are occupied but need feedback on proposals from Merlin/Hen harrier advisor [redacted] 11.10.24 Updated Merlin report downgrades territory N from 'major' to 'moderate' impact. Territories R, M and J are downgraded from 'moderate' to minor. Territory Q is still consider 'major' significance. Rationale for not implementing further mitigation is still commercial interest of scheme and its not obvious what has changed to downgrade impacts as mapping is the same. Description of 'semi-open canopy W4' has changed and is now described as 'sporadic planting averaging 1600 stems/ha' rather than *"Highly important species composition which will act as an ecotone throughout the site. A native woodland and shrub mix, with a stocking density of 400-500 trees/ha. This density creates an open canopy habitat where the average space between trees is between 4.5-5m, allowing for that sense of open-ness which many birds and animals (Merlin included) require'* as previously described. No feedback or comment from [redacted] provided Not clear if actual planting prescription has been shared with [redacted] who as indicated satisfaction with 'native scrub' whereas actual planting is w4 @1600 – does he fully understand what is being proposed? A Specific map showing species vs territories would be helpful. Cumulative impacts of the windfarm on merlin have not been considered, particularly around Territory N which has been downgraded from 'major' to 'moderate'. The peatland restoration work has also been referred to in mitigation but there is no detailed reference to this project as background to the SOR.	The mitigation codes listed here relate to this specific topic B09, B17			Merlin: RSG RSPB Graeham Rebecca
~~19~~	~~BIODIVERSITY~~	~~Project has the potential to impact Merlin~~	~~Merlin have been studied at Glen Dye for many years, how will the projects be designed with Merlin in mind? MoP 25.01.23~~	See Note 1.		NA			
20	BIODIVERSITY	Project has the potential to impact Hen Harrier	Birds Hen Harrier and Merlin also use this site. (RSPB 12Sept22)	Breeding bird surveys and historic data indicate a number of raptors including hen harrier are present at Glen Dye Moor. Breeding sites will be identified and protected in line with current best practice mitigations including timing restrictions, planting buffers, and habitat enhancement. (21Feb23 [redacted] Breeding bird surveys resulted in no identified breeding sites of hen harriers at Glen Dye Moor. A hen harrier flight was recorded during the breeding bird survey. [redacted] confirmed that hen harrier have not bred at Glen Dye Moor for many years however he provided data on historic sites used for breeding and these have been recorded. Where possible, areas where historic hen harriers have been recorded are provided a suitable mosaic of woodland and open ground to encourage hen harrier to return to Glen Dye Moor. (30Aug24, [redacted].	(17.07.24, [redacted] feedback) SOR makes no reference to hen harrier although one record in bird survey. Understood that short-eared owl and hen harrier have similar habitat requirements but SOR should explicitly include detail on hen harrier. (18/07/24, [redacted] feedback) As above (Issue 19 - not all territories are occupied but need feedback on proposals from [redacted] 16.10.24 Comment on design required from [redacted] to confirm suitability of new mosaic	No mitigations are required.			Hen Harrier: RSG RSPB Graham Rebecca
~~20~~	~~BIODIVERSITY~~	~~Project has the potential to impact Hen Harrier~~	~~How will birds like Hen Harrier be protected? MoP25.01.23~~	See Note 1.		NA			
21	BIODIVERSITY	Project has the potential to impact waders	Birds Ensure the populations of red listed waders will remain in good numbers. (Feughside CC 18Sept22) Wader guidance is available and should be followed. (NatureScot 14Sept22, 18Sept23)	Woodland creation and peatland restoration designs will take into account results from breeding bird surveys. This will ensure that where significant wader populations are present, these are suitably protected from disturbance or habitat change. (21Feb23 [redacted] First EIA screening submission 3rd March 2023 includes a habitats and species survey. Second EIA Submission 17th October 2023 included a new 'EIA Constraints Map – Wildlife' showing breeding territories. Third EIA screening submission 31st January 2024 included a new suite of detailed 1 10,000 'EIA Screening Waders Maps 1-16' with annotations noting mitigations included in the design. A new appendix was also created, 'Curlew Assessment Summary' which outlines the breeding bird survey's findings, local expert knowledge and how their proposed mitigations have influenced species design. Open ground was carefully considered around specific territories and each territory is reviewed in detail. Fourth EIA screening submission 11th March 2024 included an updated 'Curlew Assessment Summary' taking into account additional discussions with RSPB to incorporate more detailed analysis on the number of breeding territories likely displaced or lost. Also included statistics on % open ground within 500m of breeding site. Fifth EIA Screening submission includes updated 'Curlew Assessment Summary' as agreed with RSPB. (30Aug24, [redacted] P)	(13Apr23, email from [redacted]) Curlew constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (17.07.24, [redacted] feedback) Responded to under individual species headings (lapwing, curlew, golden plover, oystercatcher, common sandpiper, snipe)	The mitigation codes listed here relate to this specific topic A09, A10, B09, B10, B17 B18, B24			
~~21~~	~~BIODIVERSITY~~	~~Project has the potential to impact waders~~	~~Will populations of red listed waders be safeguarded? MoP 25.01.23~~	See Note 1.		NA			
21	BIODIVERSITY	Project has the potential to impact waders	Potential impact on Lapwing. good to better understand what measures will be taken to ensure that the currently healthy population of red listed waders such as Curlew and Lapwing, especially between Spital and Charr Bothy, will remain in good numbers. We would be grateful if you could please share those plans with us ?. (Feughside CC Sept 2022)	Two lapwing territories were identified within the survey area. The recommendation is to provide open ground within the proposal to ensure suitable habitat remains within the area. This has been achieved and can be seen on the 9.1.1 to 9.1.17 Species Map when compared to the 9.2.1 to 9.2.17 Waders Maps as well as within the 3.3.3 Constraints Map Wildlife. There is no expected impact to the population. (30Aug24, [redacted])	12.07.24, [redacted] feedback) Supplemental detail required on mitigation and potential impacts on lapwing. Species noted on wader maps but no reference in SOR with regards to distribution across the site and cumulative impacts 14.10.24 Mapping is noted but there is no reference to lapwing within the SOR text to demonstrate that lapwing have been considered. CUmlative impacts arising from adjacent windfarm development should also be considered	The mitigation codes listed here relate to this specific topic: A09, A10, B09, B10, B17 B18, B24			Lapwing, Golden Plover,Oystercatcher, Common Sandpiper cummulative impacts from adjacent windfarm RSPB
21	BIODIVERSITY	Project has the potential to impact waders	Potential impact on Golden Plover	Golden plover territories identified within the survey report are predominantly located on ground which is unsuitable for planting and as such the majority of golden plover sites have been left unplanted or have benefited from being within a similar footprint toa curlew territory which has also been left with corridors of open ground. Based on the application of recommendations from the survey report, there is no significant negative impact expected to the population. (30 Aug 24 [redacted]	(12.07.24, [redacted] Supplemental detail required on mitigation and potential impacts on golden plover. Species noted on wader maps but no reference in SOR with regards to distribution across the site and cumulative impacts 14.10.24 Mapping is noted but there is no reference to golden plover within the SOR text to demonstrate that they have been considered. CUmlative impacts arising from adjacent windfarm development should also be considered	The mitigation codes listed here relate to this specific topic: A09, A10, B09, B10, B17 B18, B24			
21	BIODIVERSITY	Project has the potential to impact waders	Potential impact on oystercatcher, common sandpiper and snipe	As per the breeding bird survey, "The three remaining breeding wader species present within the survey area are considered to be relatively tolerant of disturbance. They do not tend to display such an avoidance to breeding near woodland areas. Snipe favouring wet areas, common sandpiper riparian zones and oystercatcher are known to be very opportunistic in their nesting habitats, successfully breeding on roundabouts and on busy university campuses, even directly outside well used buildings (Colin Nisbet pers. Obs.). As such, the regional populations of these species are unlikely to be adversely affected by the woodland creation project." There are no specific mitigations within the afforestation proposal relating to these species and it is not likely there will be a significant negative impact. (30 Aug 24)	(12.07.24, [redacted]) Supplemental detail required on mitigation and potential impacts on oystercatcher, common sandpiper and snipe. Species noted on wader maps but no reference in SOR with regards to distribution across the site and cumulative impacts 14.10.24 Mapping is noted but there is no reference to oystercatcher, common sandpiper or snipe within the SOR text to demonstrate that these have been considered. CUmlative impacts arising from adjacent windfarm development should also be considered	The mitigation codes listed here relate to this specific topic: A09, A10, B09, B10, B17 B18, B24			

22	BIODIVERSITY	Project has the potential to impact Black Grouse	Birds Black grouse are present, leks are to be mapped and woodland design to focus on low density native scrub, mixed species productive-native mosaics, and min 200ha connected quality moorland within 1km of leks. No commercial planting within 200m of leks. Minimise fencing and mark where needed. Vegetation management should be planned to prevent rank heather. (RSPB 12Sept22) Key black grouse lek near old township which the public come to observe, incorporation of open ground is important. Ensure that woodland is not eventually surrounding the lek in the long term for it to remain an active lek. Good to have areas which draw people as this can minimise pressure from other areas of the site. (RSPB 18Sept23)	Glen Dye Moor hosts an active black grouse population with multiple leks currently identified. Locations of leks will be mapped and mitigation measures planned to ensure disturbance does not occur during critical periods. Habitat management will also be planned to ensure new woodland design complements Black Grouse habitat needs including connected open corridors and mixed density woodland comprised of varying woodland types. Where fences are erected within 2km [updated from 1.5km to 2km 11Mar24,[redacted] of a black grouse lek, these will be marked to improve visibility and reduce risk of bird strike. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes a habitats and species survey. Second EIA Submission 17th October 2023 included a new 'EIA Constraints Map – Wildlife' showing breeding territories. Third EIA screening submission 31st January 2024 included a new suite of detailed 1 10,000 'EIA Screening Other Wildlife Maps 1-16' with annotations noting mitigations included in the design specific to leach lek site. Issues log also updated as below. Woodland design aims to avoid identified leks. Fifth EIA screening submission 30th August 2024 includes updated 9.1.1 to 9.1.17 Species Maps as well as an updated 3.2.1 to 3.2.3 New Infrastructure Maps which included areas of fence marking. Black Grouse breeding sites are detailed within the following maps, 3.3.3 Constraints Map Wildlife CONFIDENTIAL and 9.4.1 to 9.4.17 EIA Screening Other Wildlife Maps. The Screening Request Form also includes Section 1.3.5 Effects on Protected species, Red Listed Birds of Conservation Concern, Black grouse.	(13Apr23, email from[redacted]) Black Grouse constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (29Nov23, email from[redacted] Maps need to show how the detail provided about existing bird sites has been built into the design. (18Dec23, email from[redacted] Group the bird information into separate maps for waders and raptors to make the information easier to read and allow more specific information to be added if required. [redacted]) Supplemental detail required on mitigation and potential impacts on black grouse. Species noted on 'Other Wildlife' maps but no reference in SOR with regards to distribution across the site and cumulative impacts. (18/07/24[redacted]) species map need to detail actions taken for Lek areas and similar required for fence marking. 10.09.24 Fencemarking not identified on maps and no specification for fencemarking which may also have a landscape impact although required for mitigation. Have RSPB been invited to comment on fencemarking? Are there any cumulative impacts with windfarm? Is there a specification for 'semi-open canopy W4' to describe the spacing/structure as being appropriate for black grouse? Prescription for this woodland type may vary across the site but this should be clearly articulated. Further engagement with RSPB required on all black grouse issues although noted that this is perhaps ongoing? Black grouse corridors are referred to but not mapped or fully described. Leks shown on 9.4.6/11 show limited corridors and connectivity to the open hill and design should be reconsidered. One lek is associated with Curlew Pair 9 and unclear for both species where alternative habitat is provided so more mitigation could be applied for both. Black Grouse assessment in similar format to merlin and curlew appendix would be helpful to provide full detail of impact assessment and mitigation.	The mitigation codes listed here relate to this specific topic B12 C14			Black Grouse RSPB
~~22~~	~~BIODIVERSITY~~	~~Project has the potential to impact Black Grouse~~	~~How will Black Grouse be protected? MoP 25.01.23~~	See Note 1.		NA			
23	BIODIVERSITY	Project has the potential to impact deer populations	Deer A fit for purpose and proportionate deer management plan should be produced. (NatureScot 14Sept22) Ongoing conversations with NatureScot, Scottish Woodlands, and the nominated Deer Controller occurred between September 2022 and July 2024 to consider and agree cull targets and compensatory cull figures. (Jul23,[redacted] Revise the cull targets to take account of your expectations and explain why the cull targets have been revised, and prepare a short and concise but detailed plan explaining how the achievement of the final cull targets will be implemented and monitored. (NatureScot, 4Jul24)	A Deer Management Plan will be produced for these proposals. A summary of this and other technical plans such as the Wildfire Management Plan will be made available online. Through consultation with neighbouring landowners and NatureScot an appropriate compensatory cull level will be agreed to ensure any potential loss of habitat does not have welfare issues on the local deer populations. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 includes a Deer Management Statement. Fifth EIA screening submission 30 August 2024 includes a full DMP which includes cull targets which have been reviewed by NatureScot. It includes a commitment to review targets annually with NatureScot. (30 Aug 24)	(10May23,[redacted] notes from meeting o[redacted] comments) DMP to support the application is required. (26Feb24, email from[redacted]) Provide a Deer Management Plan. (31May24) Have provided a statement rather than a plan – needs to be site specific to the site and provide more detail on cull targets, monitoring etc. (31May24, email from[redacted] Full Deer Management Plan must be provided. [redacted]) Understood that Deer Management Plan is in development and will be made available to SF in due course. 22.10.24 Recent DMP correspondence notes that the total new fenceline is 45km. There is no discussion within the proposal as to why it is necessary to fence the whole perimeter of whether or not alternatives have been explored. The proposal needs to justify why SF should support a fenceline here when Scottish Government is already supporting deer control in the local area. It should also consider fit with UKFSv5 with respect to deer control and general forest practice; mammal damage; supporting ecological practices and adaptive management The DMP correspondence doesn't point to any actions or outcomes arising from the meeting of 6th Sept other than 'ongoing communication'. Note that positive and productive engagement with neighbours is key to risk mitigation within DMP. This needs to be evidenced. Consideration of alternative carcass handling/processing also noted as mitigation in DMP along with communication strategy for DMP – have these been developed further? Year 1 cull target of 540 noted with Yr2 240 and Yr 3 – 5 110. Also noted in DMP that cull will be underway 'shortly'. Are these figures based on any existing active control? How have deer been managed since change of ownership?	The mitigation codes listed here relate to this specific topic C15			Deer Management: NS Neighbouring Landowners
~~23~~	~~BIODIVERSITY~~	~~Project has the potential to impact deer populations~~	~~Will deer be managed in agreement with neighbours as a strategic plan? MoP 25.01.23~~	See Note 1.		NA			
23	BIODIVERSITY	Project has the potential to impact deer populations	Neighbouring deer control efforts to be taken into account when planning compensatory culling. (Gresham House 29Jul22)	A Deer Management Plan will be produced for these proposals. A summary of this and other technical plans such as the Wildfire Management Plan will also be made available online. Through consultation with neighbouring landowners and NatureScot an appropriate compensatory cull level will be agreed to ensure any potential loss of habitat does not have welfare issues on the local deer populations. (21Feb23[redacted] First EIA screening submission 3rd March 2023 includes a Deer Management Statement. Fifth EIA screening submission 30 August 2024 includes a full DMP which includes cull targets which have been reviewed by NatureScot. It includes a commitment to review targets annually with NatureScot. (30 Aug 24)		The mitigation codes listed here relate to this specific topic C15			
24	BIODIVERSITY	Project has the potential to impact Feughside LNCS	Sensitive sites present along with degraded habitats. Local Nature Conservation Site (LNCS) noted. (Aberdeenshire Council 10Aug22)	The Feughside Local Nature Conservation Site (LNCS) sits within some of the proposal area. Relic glacial and fluvial landforms are present within the proposal area which could be at risk from peatland and afforestation proposals. Identification of these sensitive features will aim in mitigating operational design to ensure these features are not degraded either through ground disturbance, or through planting resulting in obscuring these features from view. (21Feb23,[redacted]) Fifth EIA screening submission 30 August 2024 includes an updated species design, this has removed planting from around an area near Greendams which is at the tow of a slope and contains features of note relating to the LNCS. Aberdeenshire Council have been consulted and have not responded with any objections to date. (30Aug24,[redacted]	(17.07.24[redacted] feedback) Proposal lacks detail on planting relative to this feature or proposals to retain views and feature in open ground in perpetuity 10.10.24 LNCS is referred to but not included on maps to illustrate retention in open ground	The mitigation codes listed here relate to this specific topic B33			LNCS Local Authority
~~24~~	~~BIODIVERSITY~~	~~Project has the potential to impact Feughside LNCS~~	~~Glen Dye and the surrounding areas have a rich geological history, noting Clachnaben as a granitic tor. How will this be protected? MoP 25.01.23~~	See Note 1.		NA			
25	BIODIVERSITY	Project has the potential to increase spread of invasive non-native species	Avoid accidental spread of invasive species, good biosecurity practices. (SEPA 18Aug22)	Invasive non-native species are not currently present at Glen Dye Moor. Good biosecurity practices for all machinery and equipment entering the site must be carried out to reduce risk of spread. Industry standard practices for biosecurity will be referenced in all contract materials issued to operators. (21Feb23[redacted] Scottish Woodlands QUEST guide for Biosecurity covers the measures and practices taken to ensure god biosecurity management on site which includes machine washing before plant enters the site, usually this occurs prior to transport to ensure organic materials are kept on site. (30Aug24,[redacted])	(17.07.24[redacted]eedback) Absence of INNS noted. SOR should record this as a nil-result to demonstrate point has been considered. Operational measures for biodiversity should be referred to in SOR 16.10.24 QUEST noted however this isnt site-specific	The mitigation codes listed here relate to this specific topic A07			UKFS
~~25~~	~~BIODIVERSITY~~	~~Project has the potential to increase spread of invasive non-native species~~	~~Are there invasive species present, how will risk of this be managed? MoP 25.01.23~~	See Note 1.		NA			
26	BIODIVERSITY	Project has the potential to impact priority habitats and GWDTEs	Marshes and mires containing locally rare species of plants are present. Proposals should consider effects of surrounding water tables. (Community member 6 26Aug22)	Ground Water Dependant Terrestrial Ecosystems (GWDTEs), including marshes and mire, have been identified in surveys and through historic data. Many of these are species rich and sensitive to change. All GWDTEs will be protected in line with industry guidance including 'Practice guide for forest managers to assess and protect GWDTEs when preparing woodland creation proposals' dated January 2018 as well as relevant peatland restoration guidance when working near rare or protected plants and animals. (21Feb23,[redacted] Second EIA Submission 17th October 2023 included a new "EIA Constraints Map – Habitats & Water" which identifies points for all rare or scare plants identified during surveys or disclosed during the consultation. Fifth EIA submission 30th August 2024 includes and updated 3.3.1 & 3.3.1a EIA Constraints Map Habitats & Water which continues to display the rare or scare plant locations. From this map it is clear than no planting is occurring near these sites and no further mitigation is required.	(12.07.24[redacted] feedback) Habitat survey notes it is not a floristic survey focused on detection of notable species and any notable species are detected incidentally in the course of such a survey[redacted] DSBI response of 13th April 2023 provides a list of key species and known locations as does as response from Alison Peak (Aug 22) but there is no reference to these anywhere else in the proposal. Where locally-notable flora has been identified, this should be mapped relative to the design and the proposal should identify appropriate mitigation and you should detail any other sources you have approached for any other local records. David [redacted]s response also includes sites out with the boundary but which could be impacted by water flow within the boundary which should be addressed by the proposal. 10.10.24 Mapping noted but can you confirm whether any additional data has been used or if more surveys have been carried out? For the avoidance of doubt, it would be more useful to label individual plants/locations so it is clear that the appropriate mitigation has been applied. THe SOR should also consider the sensitivities/operations in the wider location that could affect these plants and make it very clear where no operations are planned that could affect these species . It is also not clear if[redacted] has been asked to comment on the current design	The mitigation codes listed here relate to this specific topic A11, B02, B04, F4			

26	BIODIVERSITY	Project has the potential to impact priority habitats and GWDTEs	Marshes and mires containing locally rare species of plants are present. Proposals should consider effects of surrounding water tables. (Community member 6 26Aug22)	Ground Water Dependant Terrestrial Ecosystems (GWDTEs), including marshes and mire, have been identified in surveys and through historic data. Many of these are species rich and sensitive to change. All GWDTEs will be protected in line with industry guidance including 'Practice guide for forest managers to assess and protect GWDTEs when preparing woodland creation proposals' dated January 2018 as well as relevant peatland restoration guidance when working near rare or protected plants and animals. (21Feb23, [redacted] Second EIA Submission 17th October 2023 included a new "EIA Constraints Map – Habitats & Water" which identifies points for all rare or scare plants identified during surveys or disclosed during the consultation.	(13Apr23, email from [redacted] GWDTE constraints not shown on maps and only briefly mentioned in screening request. Use more detailed scale for maps. Analyse survey information, identify issues highlighted by reports in the screening request form, and detail any mitigation required. (19Sep23, PP) The 20m buffer from the edge of the GWDTE habitats will be planted with low density native species where appropriate enhance the wetland habitats and create wet woodlands. This provides a transitional area between dense planting and the wetland itself, creating an ecotone which is missing in the environment. Created a Water Environment Assessment Summary to explain how water assets have influenced planting design. (31May24, email from [redacted] Soil and deep peat maps and survey methodology should be provided. (12.07.24 [redacted] feedback) GWDTE buffers noted. Mapping appears to show some of these as being planted with NBL model but text refers to LD-NBL being used as transitional buffer. Buffers all appear to be same width and no discussion as to why it is appropriate to plant up some buffers and not others. Where there are clusters of GWDTE, these appear to have all been buffered individually rather than considering consolidating to avoid small areas of planting between GWDT which may impact hydrology. Further detail on rationale for GWDTE buffering required and it may be appropriate to ask surveyor to comment on design and GWDTE mitigation. 10.10.24 GWDTE buffers noted as all being 20m but no discussion as to why it is appropriate to plant up some buffers and not others. Where there are clusters of GWDTE, these appear to have all been buffered individually rather than considering consolidating to avoid small areas of planting between GWDTE which may impact hydrology. May be appropriate to ask surveyor to comment on design and GWDTE mitigation. Proposed feathering / variable spacing should be articulated on maps to describe planting at each location rather than providing one indicative illustration. Note also that NS response of 12th Sept also questions the evidence base for planting buffers around GWDTE.	The mitigation codes listed here relate to this specific topic A11, B02, B04, F4			GWDTE: Botaneco Significant plant species: David Elston
~~26~~	~~BIODIVERSITY~~	~~Project has the potential to impact priority habitats and GWDTEs~~	~~Some rare plants grow in the marshes and mires of Glen Dye Moor, will these be protected? MoP25.01.23~~	See Note 1.		NA			
26	BIODIVERSITY	Project has the potential to impact priority habitats and GWDTEs	GWDTEs/Peatlands including those restored must be accorded appropriate buffer from afforestation. (South Grampian Wildfire Group 2Sept22) Better to leave wetlands unplanted and surrounded by plantations of native species. (NatureScot 03Nov23) Removal of wetland areas from the planting proposal is welcomed. (NatureScot 4Jul24)	GWDTEs have been identified in surveys and through historic data. Many of these are species rich and sensitive to change. All GWDTEs will be protected in line with industry guidance including 'Practice guide for forest managers to assess and protect GWDTEs when preparing woodland creation proposals' dated January 2018 as well as relevant peatland restoration guidance when working near rare or protected plants and animals. Woodland creation will be designed in line with the 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals.' (21Feb23, MP)Woodland creation design will follow UKFS recommended buffers for watercourses of 10m for watercourses less than 2m in width, 20m for watercourses more than 2m in width and along edges of wetlands, and 50m for abstraction points of water supplies. In addition to this woodland creation will be designed in line with the 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals. ' (21Feb23[redacted] First EIA screening submission 3rd March 2023 includes Ecological survey which details the peat survey and methodology and map of planting areas (EIA Screening Request Species Map). Second EIA screening submission 17th October 2023, includes a new EIA Constraints Map 'Habitats & Water' which shows deep peat (mapped with a 20m buffer) alongside other habitat types and a new detailed species maps (EIA Screening Species Design Maps 1-16) and a new 'EIA Constraints Map- Habitats & Water'. Third EIA screening submission 31st January 2024 included a new Water Environment Assessment Summary to explain how water assets have influenced planting design. The 20m buffer outside the edge of the GWDTE habitats will be planted with low density native species where appropriate enhance the habitat around the wetlands and create native open canopy woodlands. This provides a transitional area between dense planting and the wetland itself, creating an ecotone which is missing in the environment. Wetlands will remain unplanted. Fourth EIA screening submission 11th March 2024 updated the Water Environment Assessment Summary to include a section on Riparian Woodlands and greater detail in the GWDTE section.		The mitigation codes listed here relate to this specific topic A11, B02, B04, F4			
~~26~~	~~BIODIVERSITY~~	~~Project has the potential to impact priority habitats and GWDTEs~~	~~How will peatlands, wetlands, or other wet areas be protected from planting? MoP 25.01.23~~	See Note 1.		NA			
27	MATERIAL ASSETS	Project has potential to introduce plastics and waste to the environment	Plastics and Waste Use of trees shelters and subsequent removal program to be detailed. Use of biodegradable shelters encouraged. (SEPA 18Aug22) (NEMT 8Sept22)	Introduction of plastics into the environment will be avoided where possible, use of alternative tree shelter materials such as biodegrading or composting materials will be considered where feasible. If plastic shelters or guards are utilised for any part of the project a removal and recycling program will be set out to ensure these materials are not retained on site as future waste. Time of removal will be planned at the point when they are no longer of use to protect the tree. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 included an EIA Screening Request Form with a brief description of the forestry project. Although there was an ambition to not use any tree shelters within the proposal, fence line adjustments have been required to reduce landscape impacts and other constraints. As such tree shelters may be required for planting outside of the deer fence. Where shelters are used they will be of alternative tree shelter materials such as biodegrading or composting materials where this is available. Where plastic tree shelters are the only option and removal of the planting areas is not deemed appropriate, a removal programme is implemented within the life of the funding contract (within 10 years) to ensure the obligation to remove and recycle plastic tree shelters is achieved and enforceable under contract. Where existing fencing on the property has become redundant, there is a planned removal during installation of new fencing. It is noted that existing fencing is present across most of the perimeter of the property with the exception of the Water of Dye past Charr Bothy and up the Water of Charr, where no existing fencing is present. In all locations were new deer fencing is shown on the New Infrastructure Maps, this will be a replacement of existing deer fencing where present, no upgrades or maintenance will be carried out due to the age and condition of all existing fences on site. (30August 2024)	(21Mar24, email [redacted] No mention is made of tree shelters, clarify if they are to be used. (5June24, notes from meeting with [redacted] Specify locations, types, and removal programmes. (15.07.24 [redacted] Noted that there is no intention to use tree shelters or vole guards across the proposed planting area however this is not explicit in the SOR. Fencing description notes that new fencing will be required and suggests that old fences will be redundant so is there a plan to deal with redundant fencing materials? Fence specification should also identify where new fence is required and where old fence will be retained, upgraded or removed. 10.09.24 Use of tree shelters noted. These should be mapped. 10.09.24 If proposal is for replacement of an existing fence, how will old fence be dealt with? Detail on removal plan required if this is the intention but if old fences are to be retained, location required relative to new fenceline to assess any potential impact for funneling deer or other wildlife and impacts on recreation	The mitigation codes listed here relate to this specific topic C12			UKFS
~~27~~	~~MATERIAL ASSETS~~	~~Project has potential to introduce plastics and waste to the environment~~	~~Do you plan to use plastic tree guards to protect the saplings? If so, how do you plan to remove them later? MoP 25.01.23~~	See Note 1.		NA			
28	SOIL	New roads have the potential to impact areas of deep peat	Access tracks should avoid areas of shallow and deep peat to avoid disturbance of key habitat and release of organic compounds to surface waters. (SEPA 18Aug22)	New access tracks will avoid sensitive areas wherever possible, including areas of deep peat. All new tracks will be carefully planned to include pre-operational diffuse pollution strategies as well as diffuse pollution management mitigations during operations to ensure that organic compounds do not reach surface waters. [redacted] First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map) which shows existing tracks and proposed new forestry tracks, the EIA Screening request form includes a brief note in Section 2 (page 2) detailing the material sourcing. Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map) which shows existing tracks and proposed new forestry tracks. Also includes a new EIA Constraints Map 'Habitats & Water' which shows deep peat mapped alongside other habitat types. Fourth EIA screening submission 11th March 2024 includes New Infrastructure Maps (North, South, West) showing existing access routes and proposed infrastructure. Also see notes on previous items relating to deep peat and roading which address this point. (30Aug24)	(31May24) New forest roads are not mapped – these need to be shown and a specification provided. (01.07.24 [redacted] feedback) Peat survey results and methodology has not been provided in full. Planting design, roading and fence line should all be mapped over peat mapping to demonstrate appropriate mitigation as required.	The mitigation codes listed here relate to this specific topic D02, D09			UKFS
~~28~~	~~SOIL~~	~~New roads have the potential to impact areas of deep peat~~	~~Will tracks be built on peat and will they cause erosion? MoP 25.01.23~~	See Note 1.		NA			

29	SOIL	Ground preparation has the potential to disturb soils and release carbon	"Cultivation of Upland Woodland Creation Sites -Applicants Guide" should be followed to minimise soil and carbon losses. (SEPA 18Aug22)	Minimising carbon losses will be a specific objective of the Operational Plan. Ground preparation methods chosen for planting will be guided by the 'Cultivation of Upland Woodland Creation Sites – Applicants Guide' to ensure methods chosen to represent the lowest feasible impact. Areas of Natural Regeneration will likely not receive any ground preparation though light scarification may be utilised where vegetation is expected to limit success. (21Feb23, [redacted] First EIA screening submission 3rd March 2023 refers to methods of operation following best practice. Second EIA screening submission 17th October 2023 included new details in the EIA screening request form, section 2 under heading 'Additional Project Specification' referring to methods of operation following best practice and cultivation techniques following Scottish Forestry 'Cultivation for upland productive woodland creation sites Applicants Guidance'. Fifth EIA screening submission 30th August 2024 includes a new 3.3.4 Constraints Map Soil Sensitivity and 9.6 Ground Preparation Map clarifying the ground conditions present and measures taken to reduce carbon loss through low impact preparation selection on sensitive soils. (30Aug24[redacted]	(21Mar24, email from [redacted]) More detail on ground prep highlighting the measures to ensure lack of siltation and chemical/plastic pollution. (31May24, email from [redacted] Detail on proposed techniques which should mitigate against siltation, chemical/plastic pollution. Currently not mentioned. (5June24, notes from meeting with [redacted] Provide a map showing potentially sensitive soils and discuss the application of different ground prep methods. (01.07.24 [redacted]) Soil survey and methodology has not been provided. Proposal should demonstrate how soils have been assessed to characterise suitability for afforestation across the site with respect to soil types and species choice. [redacted]) Proposal should describe and map ground preparation methods to be deployed across the site and explain how ground preparation will minimise soil disturbance, erosion and carbon loss. 09.09.24 Map 9.6 noted however this needs to split out areas of manual cultivation in sensitive areas so it is clear where these are 09.09.24 Map 3.3.4 noted as are photographic annotations however underlying soils mapping appears to be a lift from JHI dataset and it is not clear in the SOR how soils have been ground-truthed or characterised to describe actual soil conditions. Elsewhere in SOR Section 1.2b there is reference to "rock areas and shallow soils in places" but these are not discussed elsewhere. Where soil conditions are not suitable to support tree growth, this will have wider implications on the landscape impact. 17.10.24 Lack of detail about ground prep in general i.e what will decide the cultivation method? what machinery will be used and how will such a large area be organised to ensure that all the required mitigation is in place ?	The mitigation codes listed here relate to this specific topic A10, A15			Ground Preparation
~~29~~	~~SOIL~~	~~Ground preparation has the potential to disturb soils and release carbon~~	~~What types of ground preparation will be used and how is this decided? How does the ground get prepared for planting?~~	See Note 1.		NA			
30	WATER	Project has the potential to impact a Drinking Water Protected Area	Water Supplies A Drinking Water Catchment covers part of the proposal area, this is a Drinking Water Protection Area (DWPA) and water quality and quantity should be protected. "Guidance on Forestry Activities near SW Assets along with UKFS to be followed. 150mm ductile iron raw water main is abandoned. No other water supplies are noted though if found during surveys, full protection and impact assessment on supply yield/volume should be carried out. (Scottish Water 13Sept22) (SEPA 18Aug22) A full appraisal of any public and private drinking water supplies. (SEPA 08Mar23)	There are no known water supply abstraction points or infrastructure currently in use within the project area. The reservoir to the south end of the property and an abandoned ductile water line to the east of the property have been confirmed by Scottish Water as no longer in use. Efforts will be made to maintain the reservoir as a biodiversity feature. As part of this project area falls into a Drinking Water Protection Area (DWPA) catchment, best practice standards will be applied during operations to ensure low risk of pollution to the water catchment and operations are planned to prevent pollution incidents, for example storage of fuels at least 50m from watercourses within the DWPA. (21Feb23, [redacted] Second EIA Screening submission 17th October 2023 included a new 'EIA Constraints – Habitats & Water Map' showing the sensitivities within the water environment. Fourth EIA screening submission 11th March 2024 includes new Supplemental Appendix 'Glen Dye Moor Water Environment Assessment Summary' this includes reference to the reservoir. Fifth EIA screening submission 30th August 2023 now includes a new appendix 10 'Diffuse Pollution Control Strategy'. It is also reiterated that no active water supplies are present within the proposal area. Further clarification is being sought from Scottish Water regarding Drinking Water Protected Areas (DWPAs) as a review of published maps suggests the nearest DWPA is kilometres away downstream and the project area catchment does not appear to fall within any DWPA catchments. Abandoned pipelines within the proposal area will be protected from damage during ground preparation and roading activities to retain them in situ and intact. (30Aug24, [redacted])	(13Apr23, email from [redacted]) More information on the possible water benefits and the status of the public water reservoir. (5June24, notes from meeting with [redacted] For diffuse pollution, the Scottish Woodlands Policy on planning for and managing diffuse pollution on site is acceptable. [redacted]) Proposal should make a site-specific response to the specific precautions for drinking water protection as set out in Annex 1 SW response of Sept 2022. At meeting 13-05-24 it was suggested that buffering of the SW assets, reservoir and associated pipework was being considered as a precaution. This should be set out in detail. 10.09.24 SW [redacted]) response of 28.08.24 notes one abstraction point within WC area - further detail required in SOR as proposal has potential to affect DWPA	The mitigation codes listed here relate to this specific topic A03, A08			DWPA: Scottish Water SEPA
31	MATERIAL ASSETS	Project has the potential to impact Scottish Water infrastructure and reservoir	Isn't the reservoir near Charr bothy a water supply? How will this be protected? MoP 25.01.23. SCottish Water Reponse 28.08.24	~~See Note 1.~~	At meeting 13-05-24 it was suggested that buffering of the SW assets, reservoir and associated pipework was being considered as a precaution. This should be set out in detail. 10.09.24 SW [redacted]) response of 28.08.24 notes one abstraction point within WC area - further detail required in SOR as proposal has potential to affect DWPA and SW assets	NA			DWPA: Scottish Water
32	MATERIAL ASSETS	Project has the potential to impact private water supplies		See above notes on water supplies.	(15.07.24, JP feedback) Proposal should be explicit on presence or absence of private water supplies within the boundary area or likely to be impacted by the project 10.10.24 Not clear what comment refers to. Proposal must be explicit on presence or absence of private water supplies within the boundary area or likely to be impacted by the project	The mitigation codes listed here relate to this specific topic A03, A08			UKFS
33	MATERIAL ASSETS	Project has the potential to impact flood management and in-stream infrastructure	Area offers significant opportunities for river and riparian restoration. A range of actions could be implemented, offering benefits to biodiversity, flood management and generally contributing to mitigating the harmful effects of climate change. Full list of suggestions supplied by DSFB. (SEPA 18Aug22) (DSBF 14Sept22) Focus on riparian zone in terms of maximising benefits. (SEPA 08Mar23) Assessment and planting proposal is appropriate and would be beneficial to the river environment, biodiversity and climate resilience. (DSBF 04Oct23)	At this time the project does not include scope for instream projects such as weir removal/modification, porous log jams, reconnecting backwater channels, etc. There is opportunity to explore these projects as separate proposals. Bankside and riparian improvements will occur as part of the native species planting and regeneration proposals. These are demonstrated on the Species Maps. (21Feb23, [redacted] Second EIA Screening submission 17th October 2023 included a new 'EIA Constraints – Habitats & Water Map' showing the sensitivities within the water environment. Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map and also includes new Supplemental Appendix 'Glen Dye Moor Water Environment Assessment Summary' explaining how watercourses have influenced planting design. Fourth EIA screening submission 11th March 2024 updated the Water Environment Assessment Summary to include a section on Riparian Woodlands and greater detail in the GWDTE section. Fifth EIA screening submission 30th August 2024 includes new details on riparian woodlands withing the 10. Water Environment Addendum, as well as a revised 3.3.1 Constraints Map Habitat & Water. These updates include notes on riparian improvements and highlight key areas around Greendams and the River Dee SAC and how proposals will be significantly enhancing these features. These updated documents have also been sent to the DSFB. New Infrastructure Maps show locations of proposed fences, water gates will be installed at every mapped watercourse crossing, these are not shown on maps as points given they will be installed at every watercourse crossing. All water gates will be designed as suited to each channel crossing ensuring that the design meets current fencing guidelines. (30Aug24, [redacted]	(29Nov23, email from [redacted]) Detailed information on riparian zone needs to be clear to all. (26Feb24, email from [redacted] Approx. 120ha of riparian woodland in the scheme which needs to be more detailed on the maps (21Mar24, email from [redacted]) Hard to see in places what is riparian, clarify. (21Mar24, email from [redacted]) Good to see maximum riparian width at Greendams, is possible. (31May24) Need more detail than is provided in the maps, prescriptive (10-20m) rather than following land form. More site-specific detail required on mitigation for salmonids within the design of the planting scheme, particularly given the SAC status of the River Dee . Figures for the % increase in riparian woodland are wrong. (5June24, notes from meeting with [redacted]) Add annotated example maps of key areas (Greendams and Water of Dye with SAC) showing buffer distances and include visual aids. (15.07.24 [redacted] feedback) Fencing prescription should detail locations of Watergates and likely impacts of on-stream infrastructure. 08.10.24 Fencing prescription still needs to consider impacts of in-stream infrastructure (ie watergates) and mitigation. HRA may require this level of detail where there is potential for work in/adjacent to watercourse	The mitigation codes listed here relate to this specific topic B03, D14			Deer Fence NS SEPA DSFB
~~33~~	~~MATERIAL ASSETS~~	~~Project has the potential to impact flood management and in-stream infrastructure~~	~~Are you building fences, where are they going? MoP 25.01.23~~	See Note 1.		NA			
~~33~~	~~MATERIAL ASSETS~~	~~Project has the potential to impact flood management and in-stream infrastructure~~	~~Will there be instream projects to benefit the water environment? MoP 25.01.23~~	See Note 1.		NA			

34	MATERIAL ASSETS	Project will have future impact on public highways	Timber Transport B974 - is currently classified as an Agreed Route. C17M - is currently classified as a Consultation Route. **Concept Map to reference these two roads and their classifications/grid references**, show the access points onto the public road network. Proposal should discuss future timber haulage and potential routes along with scale of future harvesting. (TTG 5Aug22)	The areas around Glen Dye Moor include extensive commercial forestry and timber transport on the public road networks currently occurs on a somewhat regular basis. The B974 is currently classified as an agreed timber transport route while the C17M is a consultation route. It is not expected that timber harvesting would occur for at least 15 years assuming thinning of the trees begins around this time. It may be much later when timber harvesting occurs if thinning is delayed due to risk of windthrow. At that time discussions with the Aberdeenshire Council roads department and the local Timber Transport Group will inform current conditions of the road network, and mitigations required to ensure safety and efficiency of timber transport on public roads. It is likely these discussions will be incorporated into the application for felling permission at the time which would also look at the wider context of felling. (21Feb23[redacted] Fifth EIA Screening Request 30th August 2024 includes reference to approved and consultation timber transport routes on the revised New Infrastructure Maps. Indicative volumes will vary significantly depending on development of the stand and if growth is good and conditions favourable an early commercial thinning of conifer areas could occur around year 20 though volumes would be significantly difficult to estimate before trees have been planted. Somewhere in the region of 300,000 tonnes are possible by the final felling phase. (30Aug24,[redacted])	(16.07.24[redacted] feedback) Proposal should provide details of indicative volumes and map details of access point on to public road network as requested as well as indicative future haulage routes to inform stakeholders at this stage and invite comment 16.10.24 Have you passed this detail onto Timber Transport Group and shared with stakeholders. Assume no comment from Aberdeenshire Council on this point? Need for confirmation of any specific timber transport measures to consider should be bottomed out					UKFS
~~34~~	~~MATERIAL ASSETS~~	~~Project will have future impact on public highways~~	~~How will the traffic risk from timber lorries be managed? MoP 25.1.23~~	See Note 1.		NA				
35	POPULATION & HUMAN HEALTH	Fenceline has the potential to impact recreational access	Fencing if extensive fencing will be used this needs to be detailed. Please provide maps and confirm access points with stakeholders. (Community Member 2 31Jul22) (Community Member 12 8Sept22) (NEMT 8Sept22) (DSFB 14Sept22) (Feughside CC 18Sept22) Ensure 'access point' signage on fence is regular. (NEMT 7Sept23)	New deer fencing is planned around the perimeter of the site. This will reduce the total amount of fencing required which would otherwise result from several large blocks. This also allows for a minimal amount of deer browsing to be sustained within the site which will benefit the ecosystems and reduce the overaccumulation of vegetation which could otherwise increase fire risk. Within the fence, deer will be managed to around 2.5 deer per square kilometre. All new infrastructure will be planned to enable access for all user types including cyclists, walkers and horse riders. Additional signage will be installed at access points and elsewhere around the site ensuring users can easily navigate between access points. Fencing riparian areas will also consider risk from flooding and location and number of Watergates to ensure long term resilience. (21Feb23[redacted] Signage will be located appropriately for recreational use based on known desire lines, winter site usage and distances from access points. (7Sept23,[redacted] Second EIA screening submission 17th October 2023, includes a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation' which shows access routes including desire lines. Third EIA screening submission 31st January 2024 includes a new Supplemental Appendix was also added, 'Glen Dye Moor Recreational Addendum' which details how deer fence proposal will be mitigated. Fourth EIA screening submission 11th March 2024 includes an updated EIA Constraints Map 'Landscape, Cultural Heritage & Recreation' which shows proposal for deer fence, access points and access info signs. Also included was a set of three New Infrastructure Maps (North, South, West) showing proposed deer fence and gates. Supplemental Appendix 'Glen Dye Moor Recreational Addendum' updated with a new map detailing proposals for signage and way markers. Fifth EIA screening submission includes an updated EIA Constraints Map 'Landscape, Cultural Heritage & Recreation' with clearer symbology for fences and access structures as well as an updated 'Glen Dye Moor	(29Nov23, email from[redacted]) Deer fencing needs to be shown at a scale where the features are clearly visible and understandable. (26Feb24, email from[redacted] Cannot see a map showing the proposed siting of the deer fence with proposed marking for black grouse and possible access/egress routes for the public (31May24, email from[redacted] There is no map showing the line of the deer fence. (15.07.24[redacted] feedback) Noted that several stakeholders have asked for fencing maps with details of gates etc however it is unclear whether or not these have been provided for comment. Proposed fence line appears to follow ownership legal boundary and does not consider topography or GET model (e.g. appears to run at 90 degrees to landform and cross straight through Mount Battock cairn). More detailed mapping required along with details of existing fence lines, conditions and retentions. 17.10.24 There are some oddities in the placing of access points on the fenceline which seem to contradict the information gathered ie 4 gates and 5 stiles below Bonnyfleeces and Wolfhill where there are no shown or obvious access needs while on the Western end where lots of access routes are indicated, only 2 gates are provided. Pedestrian gates will not allow access to the broadest range of user groups. Self Closing Bridle gates should be used. The use of stiles will not be appropriate in the vast majority of locations as they do not facilitate all-user use. If a location is considered to merit a stile, this should be justified under the SOAC and will require further engagement with stakeholders.	The mitigation codes listed here relate to this specific topic C04-C09, E08-E09			Fencing / Access: Aberdeenshire Council Local Council Main user groups NEMT etc
~~35~~	~~POPULATION & HUMAN HEALTH~~	~~Fenceline has the potential to impact recreational access~~	~~Are you building fences, where are they going? MoP 25.01.23~~	See Note 1.		NA				
36	BIODIVERSITY	Fenceline has the potential to impact wildlife	Are you building fences, where are they going? MoP 25.01.23	See Note 1.	(17.07.24[redacted]) Detailed fencing maps required to demonstrate fence line relative to sensitive features and locations to assess where access gates etc will avoid disturbance or damage. Noted intention to mark sections of the fence to prevent bird strike. Have RSPB been engaged on fence marking prescription or to comment specifically on fence? 10.10.24 Fencing maps dont indicate where marked sections are or the specification for marking. Have RSPB been engaged on fence marking? UNderstand proposal is to install new fence around perimeter but no detail on retention/removal of exisiting fences and potential impacts for wildlife funneling	NA			Fenceline: RSPB NS Local Authority
38	LANDSCAPE	Fenceline will have a potential impact on landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)	Ensure access and views/ viewing corridors are maintained. Only plant well back from main access tracks and avoid planting at good viewpoints (NEMT 22Jul22) (Finzean CC 18Aug22) (South Grampian Wildfire Group 2Sept22) (Community member 12 8Sept22) A full LVA will need to be produced, the site falls within the Clachnaben and Forest of Birse Special Landscape Area (SLA). (NatureScot 14Sept22) Important that key viewpoint are kept clear. (NEMT 7Sept23)	A landscape appraisal will inform the project design to ensure key viewpoints, access corridors and sensitive landforms are taken into account. Clachnaben in particular will be carefully incorporated into the design including the approach paths to ensure the recreational vistas are maintained and a sense of 'enclosure' is not created at key areas. (21Feb23[redacted]) First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map), a baseline review (with reference to landscape character and designations) and a Landscape Review document. Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map), and a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map. Fourth EIA screening submission 11th March 2024 includes revised EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. New Landscape review part 2 document was added containing visualisations from a sample of the viewpoints. Fifth EIA screening submission 30th August 2024 has updated the Landscape Review though comments remain pending from Scottish Forestry following a site visit in April 2024.	Survey information provided but not analysed to identify issues and mitigation. (13Apr23, email from[redacted]) Landscaping needs to be shown at a scale where the features are clearly visible and understandable. (29Nov23, email from[redacted] Provide a Landscape Assessment and Review. (15Jan24, notes from meeting with[redacted] Show more annotations with visuals for landscaping. Arrange a site visit. (26Feb24, notes from phone call with[redacted]) Landscape Assessment needs to include impressions of the potential scheme. (26Feb24, email from[redacted]) Need to show more impressions from main viewpoints and how the scheme will impact the landscape. (31May24, email from[redacted] 22.10.24 SF's landscape review feedback is still outstanding, but the Aug 2024 resubmission doesn't consider the phasing of the project and presents the landscape change as a single phase rather than illustrating and assessing Phase 1, Phase 1&2 and Phase 1, 2& 3 as separate instalments as they would be delivered. Mount Shade – planting appears to extend to high up hillside. Does landscape assessment show imagery from most up to date design? Charr bothy images show internal planting. Lack of external viewpoints looking in. Consultation record suggest important views from main road will be considered.	The mitigation codes listed here relate to this specific topic B27, B30, B31, B42, B46, C10.3, D07			UKFS

39	MATERIAL ASSETS	Charr Bothy and its approach and environs may be impacted by the project	Charr Bothy Access to the bothy as well as approach and environs around the bothy to be sensitively protected. Desire for private half of the structure to be made publicly available or available by request in future. (MBA 8Sept22) (Community member 12 8Sept22) (Scouts 10Oct22)	Charr Bothy is an important feature at Glen Dye Moor as well as being a valued publicly available asset for community use. Following a recent long term lease agreement with the Mountain Bothy Association, it will be maintained as a Bothy open to the public in future. Half of the bothy remains locked and will be used privately for the time being to host project meetings and workshops. Woodland creation around the Bothy will be carefully planned to ensure the setting and scenic qualities are maintained. (21Feb23[redacted]) First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map), and Landscape review Second EIA screening submission 17th October 2023, includes updated map of planting areas (EIA Screening Request Species Map), and a new EIA Constraints Map 'Landscape, Cultural Heritage & Recreation' Third EIA screening submission 31st January 2024 includes new 'EIA Screening Species Design Maps' 1-16 and Index Map. Map 11 shows how the design around the bothy has been considered to ensure the setting and scenic qualities of the bothy are maintained. Fourth EIA screening submission 11th March 2024 includes revised EIA Constraints Map 'Landscape, Cultural Heritage & Recreation'. New Landscape review part 2 document. Fifth EIA screening request 30th August 2024 includes an updated Landscape Review with a focused viewpoint to and from the Charr Bothy.	(17.07.24[redacted]) Proposal should detail planting proposal around Charr Bothy to demonstrate how setting and sense of place will be impacted. 17.10.24 Does landscape assessment show imagery from most up to date design? Charr bothy images show internal planting.	The mitigation codes listed here relate to this specific topic B30, B44, F1			UKFS
~~39~~	~~MATERIAL ASSETS~~	~~Charr Bothy and its approach and environs may be impacted by the project~~	~~What will happen with Charr Bothy? Will the locked half of the bothy be available in future? How will you plan the project around the approach and surrounding areas of the Bothy? MoP25.1.23~~	See Note 1.		NA			
~~40~~	~~CULTURAL HERITAGE~~	~~Project has the potential to impact unscheduled archaeological features~~	~~Will the cultural heritage sites be protected during operations? Will this include the field enclosures near Charr Bothy? MoP 25.01.23~~	See Note 1.	(12.07.24[redacted] feedback) Can you please provide more details of the operational mitigation which will be adopted during establishment? This should also refer to UKFS measures to be adopted. [COMMENT STILL RELEVANT - MOVE TO CELL I130]	NA			Hydrological function of peatland: NS
~~40~~	~~CULTURAL HERITAGE~~	~~Project has the potential to impact unscheduled archaeological features~~	~~Will the cultural heritage sites be protected during operations? Will this include the field enclosures near Charr Bothy? MoP 25.01.24~~	See Note 1.	(12.07.24[redacted] feedback) Features CHS4 - 10 are referred to in the GUARD archaeology report as being of regional cultural heritage significance and not 'local' significance as referred to in the SOR.. These features do not appear to have been preserved in situ and excluded from planting as per the report recommendations with areas of planting proposed within the boundary of the features. The proposal should also demonstrate how it accords with SPP para 151 and LDP Policy HE1 and retains the 'sense of place' with regards to landscape setting for these features. [COMMENT STILL RELEVANT - MOVED TO CELL I130]	NA			UKFS
41	BIODIVERSITY	Project has the potential to impact extensive open ground habitats	peatland / wetland retain in OG Also, there is much concern about planted conifers self-seeding, mostly directed at Sitka spruce but probably only because that is the most widely planted species. Although it will be some time before the Glen Dye Project exotics reach reproductive maturity, you could set a good example to others by developing a plan for dealing with this problem from the outset.[redacted] BSBI April 2023.	The fifth EIA screening submission 30th August 2024 includes a Master Mitigation List (referenced on all maps and issues log) which contains a section on monitoring covering how the conditions on site are monitored over time to ensure trends are identified and actions taken to reach long term environmental objectives and net gains. This is also referenced in the 10.6.1 and 10.6.2 Overarching Strategy and Draft 2040 vision for the entire property. (30Aug24)	(12.07.24, [redacted] feedback) Proposal should explain how designed open ground will be maintained in perpetuity and consider how risks of SS self-seeding will be managed or reduced 17.10.24 Monitoring strategy noted but what are management or design interventions to maintain DOG and reduce risks of SS self-seeding?	The mitigation codes listed here relate to this specific topic F4			UKFS
42	LAND	project may have a cumulative impact alongside windfarm development and peatland restoration		Further discussion will be required to determine what degree of assessment is required for this CIA. All area of peatland restoration are occurring on areas of existing peatland in a degraded condition and is not considered a land use change. Surveys for the purposes of woodland creation have not assigned any conditions to peatland and treated all identified peatland as requiring equal consideration in terms of planting distances, woodland types, densities, and ground preparation methods which have all been chosen to not impact peatland areas whether restored or not. Land use of the entire property from sporting to non-sporting occurred in the year of purchase, and land use change from open habitats to forestry is addressed within this proposal. The neighbouring windfarm has been added tot eh site description. (30Aug24)	(17.07.24[redacted] feedback) Proposal makes no reference to proposed windfarm as a neighbouring land use change and its cumulative impact. Proposal also lacks detail on associated peatland restoration project as another land use change. 12.09.24 See notes on windfarm mitigation (Issue 42 Notes Tab). Have NS Peatland Action project also been engaged to explicity comment on woodland creation proposals and fit with peatland restoration to demonstrate no conflict/impact on peatland as a result of afforestation - i.e buffers/planting footprint will not compromise hydrological functions?	NA			Cumulative Impacts of Land Use: NS
38	LANDSCAPE	Fenceline will have a potential impact on landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)	A full LVA will need to be produced, the site falls within the Clachnaben and Forest of Birse Special Landscape Area (SLA). (NatureScot 14Sept22)	A landscape appraisal will inform the project design to ensure key viewpoints, access corridors and sensitive landforms are taken into account. Clachnaben in particular will be carefully incorporated into the design including the approach paths to ensure the recreational vistas are maintained and a sense of 'enclosure' is not created at key areas.	22.10.24 SF's landscape review feedback is still outstanding, but the Aug 2024 resubmission doesn't consider the phasing of the project and presents the landscape change as a single phase rather than illustrating and assessing Phase 1, Phase 1&2 and Phase 1, 2& 3 as separate instalments as they would be delivered.	The mitigation codes listed here relate to this specific topic A15, B27 - B40, C10-C12, D07-D11			UKFS
~~38~~	~~LANDSCAPE~~	~~Fenceline will have a potential impact on landscape and Clachnaben and Forest of Birse Special Landscape Area (SLA)~~	~~Are you building fences, where are they going? MoP 25.01.23~~	See Note 1.		NA			
44	MATERIAL ASSETS	New roads and tracks will be required to service the site	Added by Scottish Forestry 07.24	Fifth EIA screening submission 30th August 2024 now includes 10.5 new forest road specification along with a revised 3.2.1-3.2.3 new infrastructure maps, these include an inset showing the constraints relative to the proposed roads. It is noted that the road near Greendams has been removed from the proposal and a crossing point removed from the road near the Spital entrance to the property. (30Aug2024[redacted])	Does landscape assessment show imagery from most up to date design? Charr bothy images show internal planting. Insufficient information included in SORF to allow assessment. Reference to quarries/borrow pits. Further detail to be provided.	NA			New Roads
45	LANDSCAPE	Planting and protection may be compromised by operational phasing and partial implementation	Phasing (Scottish Forestry 31May24)	Fifth EIA screening submission 30th August 2024 now contains 10.6 Project Delivery Reporting Structure which includes a phased approach description. (30Aug24,[redacted]	22.10.24 SF's landscape review feedback is still outstanding, but the Aug 2024 resubmission doesn't consider the phasing of the project and presents the landscape change as a single phase rather than illustrating and assessing Phase 1, Phase 1&2 and Phase 1, 2& 3 as separate instalments as they would be delivered.	No mitigation required			UKFS

46	CLIMATE		Carbon Sequestration through trees Increase areas of Sitka spruce to improve carbon capture. (Gresham House 29Jul22)	Research continues to be published looking at carbon capture of trees and indeed results can contradict each other with some recent studies showing commercial conifer planting capturing significantly more carbon than native woodland planting while other research suggesting planting can result in net carbon release. Most studies focus on net carbon trends which take into account the full picture of how sites are chosen, prepared, planted, and managed over time. As woodland creation at Glen Dye Moor intends to only plant suitable species on suitable ground, 'the right tree in the right place', many of the issues around organic soils and slow tree growth will be avoided. This ensures that trees have the maximum chance of realising their full carbon capture potential. Forest Research, the leading UK organisation engaged in forestry and tree related research, recently published the summary report below looking at carbon capture at a sector wide scale in the UK. Matthews, R.W., Henshall, P.A., Beauchamp, K., Gruffudd, H., Hogan, G.P., Mackie, E.D., Sayce, M. and Morison, J.I.L. (2022) Quantifying the sustainable forestry carbon cycle Summary Report. Forest Research Farnham. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 refers to methods of operation following best practice and cultivation techniques following Scottish Forestry 'Cultivation for upland productive woodland creation sites Applicants Guidance'. Ecological survey also submitted which details the peat survey and methodology. Second EIA screening submission 17th October 2023, includes a new EIA Constraints Map 'Habitats & Water' which shows deep peat mapped alongside other habitat types. Fifth EIA screening submission 30th August 2024 includes 3.3.4 Constraints Map Soil Sensitivity 9.6 Group Preparation Map. Also see revied section 8.2 which includes a supplemental 8.2.2 Constraints Dee Peat Map and 8.2.1 Deep peat assessment methodology and approach.	(31May24) Detail on proposed techniques which should mitigate against siltation, chemical/plastic pollution. Currently not mentioned. (31May24) Soil and deep peat maps and survey methodology should be provided. 16.10.24 See comments on soil and deep peat under Issues 1 and 29	The mitigation codes listed here relate to this specific topic A10, B22			NS
46	CLIMATE		Conflicting evidence that tree planting on organic soils results in net carbon capture vs release. (Community member 10 9Sept22)	Research continues to be published looking at carbon capture of trees and indeed results can contradict each other with some recent studies showing commercial conifer planting capturing significantly more carbon than native woodland planting while other research suggesting planting can result in net carbon release. Most studies focus on net carbon trends which take into account the full picture of how sites are chosen, prepared, planted, and managed over time. As woodland creation at Glen Dye Moor intends to only plant suitable species on suitable ground, 'the right tree in the right place', many of the issues around organic soils and slow tree growth will be avoided. This ensures that trees have the maximum chance of realising their full carbon capture potential. Forest Research, the leading UK organisation engaged in forestry and tree related research, recently published the summary report below looking at carbon capture at a sector wide scale in the UK. Matthews, R.W., Henshall, P.A., Beauchamp, K., Gruffudd, H., Hogan, G.P., Mackie, E.D., Sayce, M. and Morison, J.I.L. (2022) Quantifying the sustainable forestry carbon cycle Summary Report. Forest Research Farnham. (21Feb23,[redacted] First EIA screening submission 3rd March 2023 refers to methods of operation following best practice and cultivation techniques following Scottish Forestry 'Cultivation for upland productive woodland creation sites Applicants Guidance'. Ecological survey also submitted which details the peat survey and methodology. Second EIA screening submission 17th October 2023, includes a new EIA Constraints Map 'Habitats & Water' which shows deep peat mapped alongside other habitat types. Fifth EIA screening submission 30th August 2024 includes 3.3.4 Constraints Map Soil Sensitivity 9.6 Group Preparation Map. Also see revied section 8.2 which includes a supplemental 8.2.2 Constraints Dee Peat Map and 8.2.1 Deep peat assessment methodology and approach.	(31May24) Detail on proposed techniques which should mitigate against siltation, chemical/plastic pollution. Currently not mentioned. (31May24) Soil and deep peat maps and survey methodology should be provided. 16.10.24 See comments on soil and deep peat under Issues 1 and 29	The mitigation codes listed here relate to this specific topic A10, B22			UKFS
40	CULTURAL HERITAGE	Project has the potential to impact unscheduled archaeological features	Not all sites are mapped on consultation materials. More detailed survey of aircraft wrecks is desired. (Aberdeenshire Council Archaeology 5Aug22) Townships should have a 10m buffer from planting, open ground should encompass all elements as a single buffered area as per UKFS. Longhouse 8-10m buffer, aircraft wreaks 10m buffer. (Aberdeenshire Council Archaeology 22Sept23) Justified explanation for why the proposed new haulage route can only be constructed in this location should be provided as a short report. Mitigation to include Excavated trench through each of the stone dykes where they are going to be removed and survey and photography of this part of the township prior to any new construction. (Aberdeenshire Council Archaeology 15Mar24) Following review of the report Aberdeenshire Council Archaeology Service support the preferred route choice. (Aberdeenshire Council Archaeology 1Jul24)	A full archaeological survey has been completed and all sites have been mitigated as outlined within the report. A summary of this work has been published onto the Glen Dye Moor website. This includes details of all the sites and their protection measures. (21Feb23,[redacted]) First EIA screening submission 3rd March 2023 includes map of planting areas (EIA Screening Request Species Map) a baseline review (with reference to Historic setting) and an Archaeological Survey Second EIA screening submission 17th October 2023, includes a new Constraints Map 'Landscape, Cultural Heritage & Recreation' produced showing archaeological features. Additional changes made to planting buffers around archaeology as recommended by Aberdeenshire Council, revised species maps reflect these changes. Species Map reproduced 20Nov23 with greater resolution, then replaced at Third EIA screening submission 31st January 2024 with 1 10,000 scale suite of maps (16 maps in suite) 31Jan24 to ensure suitable readability and visible planting setbacks. (31Jan24) Fourth EIA screening submission 11th March 2024, includes updated EIA Constraints Map 'Landscape, Cultural Heritage & Recreation' with reference to plane wreck sites. Fifth EIA screening request 30th August 2024 includes a new appended report produced demonstrating the selection process which considered alternative routes for timber haulage to avoid archaeology and an assessment on the potential impacts following mitigations. New forest road will run through one township, proposed setting is limited to removal of sections of stone dykes. An 'Alternatives Report' has been produced, this is recorded within the consultation responses. There is opportunity to develop a community benefit during the road works by organising an archaeological dig of the road excavation route and ensuring local archaeological groups benefit from the findings. There is also scope to have this activity be open and available to the public should they wish to observe. Details	(29Nov23, email from[redacted]) Provide maps showing archaeological features and buffer areas and how they adapt or layer with other features such as curlews, botanical interests etc. (26Feb24, email from[redacted]) Unable to see plane wrecks on maps or a description of their treatment. (31May24, email from[redacted]) Plane wrecks are mentioned but not mapped or treatment described. (12.07.24, [redacted] feedback) Can you please provide more details of the operational mitigation which will be adopted during establishment? This should also refer to UKFS measures to be adopted. (12.07.24[redacted] feedback) Have you shared the survey with ACA for comment? Aircraft sites should be highlighted in suite of species design maps to demonstrate mitigation. (12.07.24[redacted] feedback) Features CHS4 - 10 are referred to in the GUARD archaeology report as being of regional cultural heritage significance and not 'local' significance as referred to in the SOR. These features do not appear to have been preserved in situ and excluded from planting as per the report recommendations with areas of planting proposed within the boundary of the features. The proposal should also demonstrate how it accords with SPP para 151 and LDP Policy HE1 and retains the 'sense of place' with regards to landscape setting for these features. 10.10.24 As per previous comment (12.07.24) Features CHS4 - 10 are referred to in the GUARD archaeology report as being of regional cultural heritage significance and not 'local' significance as referred to in the SOR. These features do not appear to have been preserved in situ and excluded from planting as per the report recommendations with areas of planting proposed within the boundary of the features. The proposal should also demonstrate how it accords with SPP para 151 and LDP Policy HE1 and retains the 'sense of place' with regards to landscape setting for these features. 10.10.24 Mitigation codes noted however these don't refer to UKFS Historic Env Guideline 18, 21 or UKFS GFP Hist Env LAndscape Character Requirements 1 or LDP ref to policy HE1. UKFS Hist Env Guideline 22 should also be referred to in SOR. 10.10.24 Have Caroline Palmer's points of Friday 6th Oct 2023 re Waterhead and area west of Charr BOthy been specifically addressed? Reference in correspondence to additional ground survey but not clear if this has been carried out? 10.10.24 Correspondence re the placement of the proposed new forest road noted as is support of ACA for preferred route however mitigation agreed with ACA to undertake supervised excavation should be detailed in full. Consideration should also be given to additional public benefit opportunity (Bruce Mann email 18th March 2024 and 15th March 2024). 17.10.24 Mapping (species map) shows heritage sites not flagged by survey and not buffered. 17.10.24 Fencing and proximity to sites not clear from scale of maps, not addressed in SORF.	The mitigation codes listed here relate to this specific topic A13, B34, B35, D04, D06, E06 F4, F5			Unscheduled Archaeology: ACA Local Authority
35	POPULATION & HUMAN HEALTH	Fenceline has the potential to impact recreational access	Deer fences – it is hoped that the erection of deer fencing across the area won't prove restrictive for other animals or human movements and gates and access points will be well thought out and discussed with the community…Recent fencing work on the Glendye Estate was discussed in collaboration between the Estate and the community, and access points for walkers/cyclists, horse riders and vehicles were agreed. Please provide a map of the deer fencing with planned vehicle/rider/bicycle/walker access points. Similar to the deer fence East of B974, we would like to review and possibly use our local knowledge and contacts to confirm the access points. (Feughside Sept 2022)	This is addressed through website publications alteration of deer fence line location and through the Deer Management Plan. (30 Aug 24[redacted])	(15.07.24[redacted]eedback) Noted that several stakeholders have asked for fencing maps with details of gates etc however it is unclear whether or not these have been provided for comment. Proposed fence line appears to follow ownership legal boundary and does not consider topography (e.g. appears to run at 90 degrees to landform and cross straight through Mount Battock cairn). More detailed mapping required along with details of existing fence lines, conditions and retentions. 26/07/24 No mention made of compensatory cull but this could part of DMP 06.09.24 Updated mapping noted as per Maps 3.2.1 New Infrastructure Map North; 3.2.2 New Infrastructure Map South; 3.3.3 New Infrastructure Map West which indicate locations of stiles, pedestrian gates and vehicle gates. These should be shared with all stakeholders for comment, particularly with regard to locations of gates and suitability of stiles. Aberdeenshire Local Outdoor Access Forum and Aberdeenshire Council Outdoor Access Officer should also be engaged. There are some oddities in the placing of access points on the fenceline which seem to contradict the information gathered ie 4 gates and 5 stiles below Bonnyfleeces and Wolfhill where there are no shown or obvious access needs while on the Western end where lots of access routes are indicated, only 2 gates are provided. If exsiting fence is still in situ, need to confirm that new access points fit with existing access points	The mitigation codes listed here relate to this specific topic B46, C04-C09, D14, E07-E16			Fencing / Access: Aberdeenshire Council Local Council Main user groups NEMT etc

47	POPULATION & HUMAN HEALTH		Additional Community Benefit. (Scottish Forestry 7Nov23)	Social benefits being proposed as part of the wider project include provision of improved and new footpaths, improved car parking, provision of toilets, interaction with local users and facilitation of wider activities such as Scouting and Duke of Edinburgh. Second EIA screening submission 17th October 2023, included a note on community projects within the updated EIA Screening Request Form, this specifies that community projects are being approved through separate approval processes. "Social benefits being proposed as part of the wider project include provision of improved and new footpaths, improved car parking, provision of toilets, interaction with local users and facilitation of wider activities such as Scouting and Duke of Edinburgh. These will be assessed and approved under separate approval processes." Third EIA screening submission 31st January 2024 includes a new appended 'Glen Dye Moor Recreational Addendum'. Fourth EIA screening submission 11th March 2024 includes commitment to carrying out some community projects including car park improvements and toilets and path maintenance within the updated EIA Screening Request Form. Fifth EIA screening Submission 30th August 2024 includes an updated Issues log, see comments below listing community benefit projects and a revised 'Glen Dye Moor Recreational Addendum' including an updated map which contains annotations pointing out the location of recreational improvement projects. A revised EIA Screening Request form now notes that for social benefits "key projects are included within these proposals to better illustrate the beneficial link that woodland creation will have for the community." A new 10.6, 10.6.1, and 10.6.2 have also been added detailing more of the wider community benefits moving beyond the scope of the afforestation and further into the Land Rights and Responsibilities. (30Aug24, MP) A list of community benefit projects being carried out or planned by the landowner are included below •[redacted] Forestry Entrants Course, in collaboration with the Scottish School of Forestry, A new forestry entrants scheme is in development to attract new individuals to the sector. •[redacted]chools engagement, [insert brief]	Provide information on the car park and toilets to be assessed under the screening. (7Nov23, email from GL to[redacted].) Need maps showing proposed recreational benefit (paths routes, linages, car parks, bothy etc). (29Nov23, email from[redacted] Tie in public projects to application. (15Jan24, notes from meeting with[redacted] 10.10.24 12 car parking spaces is not sufficient for a scheme of this size - this needs to be significantly increased. ACAS have made reference to their own guidance for increasing public benefit from archaeological sites but this hasnt been followed up. While the aims of a forest entrants course and peatland operators training are needed and welcome, they dont bring any direct benefits to Glen Dye. Assume there is a schools engagment brief which is still to be provided? Charr Bothy lease renewal is welcome but 'business as usual' rather than offering new opportunities as are proposals to maintain exisiting paths rather than upgrade exisiting informal paths or desire lines or to create new linkages within the site	see master list for picklists, pull through relevant mitigations. B45, D04, D14, E07, E12, E16, F1, F2, F5			UKFS
48	BIODIVERSITY		Monitoring There would be value in developing a monitoring programme, including repeat breeding bird surveys to establish the long-term impact on this level of landscape scale change. (11Mar24, MP)	Fifth EIA screening submission 30th August 2024 includes a monitoring strategy within sections 10.6, 10.6.1, and 10.6.2 which the landowner is committed to implementing moving forward. It incorporates a number of wider monitoring strategies which are not directly related to the afforestation but demonstrates a commitment to active monitoring and adaptive management at a landscape scale. Additional monitoring for deer is included in the Deer Management Plan and specific open ground monitoring is noted in the agreed mitigation column.	Commit to monitoring as a condition of the application. Include monitoring and management strategy for areas planned as designed open ground. (5June24, notes from meeting with[redacted] 09.09.24 X-REF with RSPB comment on curlew monitoring?	see master list for picklists, pull through relevant mitigations. F4			Curlew: RSPB
50	POPULATION & HUMAN HEALTH	Stakeholder Engagement and Notification		14.08.24 SWL shared spreadsheet of all stakeholder contacts for comment from SF as to who should be regarded as key stakeholder	06.09.24. Can you provide detail as to who the un-named neighbours are to evidence that all adjacent neighbours/properties have been made aware of the plans? SWL need to go back out to all neighbours and community councils regardless of whether they had no comment or didn't respond in 2022. The 2024 round of engagement should be considered as a recap or refresher and chance to make contact with these groups, particularly community councils as they are voluntary and go through phases of abeyance. 2022 engagement did not include details of fencelines or access points and these should also be shared with neighbours for comment. The Rifle Club should also be treated as a neighbour rather than an interested party. Re SWL spreadsheet shared on 14th August 2024 Cells highlighted in other colours and not clear what the status is. Note that the BSBI recorde[redacted]) isnt on that list and he was flagged in the Issues Log for data he has on floristic interest. Also, what is the status of the Dee Catchment Partnership? If it is still active, repeat approach rather than just recording the email address as returning emails. The approach to including individuals is also inconsistent with regards to addressing specific feedback eg CM2 and a question on deer fencing and gates General public questions can be addressed by directing to the website but it needs to be up-to-date (as does any info posted on-site on notice boards) Looking at The Glen Dye Moor Project - Glen Dye Moor this is out-of-date and refers to planting starting in 2023 etc. It also includes the same Q&A issues log presented to us and which we have already fed-back on as lacking site-specific detail to address many of the questions raised by the general public.				UKFS
51	BIODIVERSITY	Proposal has potential to impact priority butterfly or moth species			10.10.24 August 2024 submission includes Aug 24 correspondence with Butterfly Conservation Scotland which indicates a need for more assessment which is due to be undertaken in October. Proposal needs to full articulate all potential species and impacts and mitigation to be agreed with BCS				Butterfly & Moth populations: BCS
52	BIODIVERSITY	Proposal will require management of existing vegetation			10.10.24 SOR states that 'Where feasible, rank heather may be cut prior to culitvation commencing'. Where rank heather cannot be cut prior to cultivation, how will this be dealt with? Ground preparation mapping should also identify areas of vegetation control and method as appropriate				UKFS
53	BIODIVERSITY	Chemical application has the potential to impact biodiversity and water quality across the site			16.10.24 During establishment operations, SOR makes reference to avoidance of fertilisers and pesticides where possible and minimised use where there are no alternatives. Can you provide more detail on the possible scenarios of use and the mitigation for this? With regards to maintenance operations, this also refers to weeding and fertilising where required. Can you please provide more details on the proposed weeding and fertilising regimes following initial planting operations?				UKFS
54	BIODIVERSITY	Proposal may affect prey populations			17.10.24 Deer management meeting notes refer to a Hare Management Plan which has not been previously suggested. Will this be provided in support of the SOR along with an analysis of impacts on GE and other raptors with regards to prey availability?				Prey populations: NS Alan Fielding RSG RSPB
55	WATER	Project has the potential to impact private water supplies	150mm ductile iron raw water main is abandoned. No other water supplies are noted though if found during surveys, full protection and impact assessment on supply yield/volume should be carried out. (Scottish Water 13Sept22) (SEPA 18Aug22) A full appraisal of any public and private drinking water supplies. (SEPA 08Mar23)		17.10.24 NOTE Item split out for clarification Water Environment Summary states that there are no known private water supplies on site but no reference to historic and abandoned infrastructure which is still regarded as PWS in terms of UKFS which makes no distinction on use or not. This infrastructure should be mapped and retained in DOG. Statement that "If any [PWS] should be identified during operations, then great care will be taken to protect water quality. Buffer distances noted within the Know the Rules booklet will be followed and further advice sought" is not sufficiently robust to describe how these would be managed .				UKFS

EIA HEADING	ISSUE	EIA ISSUE REASONING
Biodiversity	Golden Eagle	Golden eagle eyrie located within 200m of the project boundary however proposal is unclear on how GE use the site and how the planting will impact potential territory. Proposal also fails to consider impacts on GE territories as arising from windfarm development to the south. Engagement with subject matter experts has not been fully-evidenced. Insufficient information provided to conclude no significant negative impacts
Biodiversity	Curlew	Further consideration on likely impacts and mitigation required for Pairs 3, 6, 7 and 9. Pairs 5, 6, 10 & 11 may also be impacted by windfarm and cumulative impacts of windfarm development have not been considered. Predator control plan has not been provided and does not consider balance between establishment and herbivore management
Biodiversity	Waders	Cumlative impacts of habitat loss as a result of adjacent windfarm development has not been considered for Lapwing, Golden Plover,Oystercatcher, Common Sandpiper
Biodiversity	Merlin	Merlin assessment records 'major' impact on one territory and 'moderate' impact on one territory after mitigation. Asssement does not consider cumulative impact of windfarm development on merlin. 'Major' likely impact on merlin requires further assessment
Biodiversity	Hen Harrier	Insufficient evidence to support statement that habitat mosaic will support hen harrier
Biodiversity	Black Grouse	Black grouse assessment doesnt consider cumulative impacts of adjacent windfarm. Design provides limited connnectivity between leks. One lek is associated with Curlew Pair 9 and unclear for both species where alternative habitat is provided. Fence marking is not specified and may have landscape implications
Biodiversity	River Dee SAC	Proposal doesnt identify mitigation to minimise risk to all qualifying species of River Dee SAC. Site-specific Diffuse Pollution Control Plan requried to detail proposed mitigation. Design should articulate full extent and species composition of riparian woodland.
Biodiversity	Deer Management	Proposal should consider landscape-scale deer management and alternatives to deer fencing. Operational detail on control missing along with wider deer control efforts
Biodiversity	Priority Flora	Proposal does not identify all priority plant species and proposed mitigation to conclude no likely impacts
Biodiversity	GWDTE	Proposal doesn't articulate proposed planting within GWDTE buffers or explain rationale for buffers or planting to conclude no likely impacts
Biodiversity	Fenceline	Proposal is for a 45km deer fence to replace existing perimeter deer fence but does not explore alternatives or provide a justification. New deer fence will impact deer movement at a landscape scale and increase risk of bird strike. Redundant fenceline in-situ will present a hazard to wildlife
Biodiversity	Predator COntrol	Predator control plan is referred to but not provided. This has not been requested by any stakeholder and the impacts of predator control on establishment have not been described
Biodiversity	Prey Management	Hare management plan is referred to but not provided. Proposal does not consider the impacts of management of a raptor prey species or provide justification for hare control
Biodiversity	Butterfly & Moths	Insufficient data provided on butterfly and moth species to determine likely significant impacts
Biodiversity	LNCS	Feature not described. Insufficient detail to confirm no impacts
Climate	Wildfire	Insufficient detail on wildfire management or control plan
Cultural Heritage	Impacts on unscheduled archaeology	Insufficient detail on mitigation for unscheduled archaeology to retain 'sense of place' around Glen Dye settlement and treatment of aircraft sites
Land	Cumulative impacts of other land use changes	Insufficient detail on cumulative impacts of adjacent windfarm and peatland restoration as land use change projects and detail of third-party ownership land management
Landscape	Visual impact	Insufficient detail on lanscape character assessment . NO consideration of landscape assessement of impacts on adjoining LCT. LVIA required. Fit with Clachnaben and Forest of Birse SLA not described. Insufficient detail presented to determine if there are significant impacts
Material Assets	Fenceline	Insufficient detail on watergates/in-stream infrastructure to demonstrate mitigation of risk to River Dee SAC. Redunant fenceline disposal/retention not detailed to determine what impacts may arise depending on preferred option
Material Assets	New Road	Insufficient detail on road construction to conclude no impacts
Population & Human Health	Fenceline	Fenceline will impact recreational use of the site. Proposed access by stile does not facilitiate all-user use and location and type of access points are not consistent with use of stakeholder feedback. Likely impacts on recreational users
Population & Human Health	Recreational access	Insufficient detail on management and retention of existing informal access provision and particularly Clachnaben as a popular walk and local landmark, or detail on expansion of access infrastructure. Proposed recreational infrastructure is insufficient with regards to car park and does not address risks to pedestrians and road users as overflow carparking uses roadside verges along the Cairn o'Mount road
Soil	Impacts on peatland restoration	Insufficient detail on impacts of afforestation on deep peat and peatland restoration project
Soil	Ground Preparation	Insufficient detail on soil types across the site and detail of proposed cultivation methods to reduce and mimimse erosion and run-off
Water	Diffuse Pollution Risk to SAC	Insufficient detail on diffuse pollution control plan and any chemical use to avoid and minimise risk to River Dee SAC
Water	Impacts on DWPA	Insufficient detail on operations and potential impacts within DWPA and associated infrastructure

Minutes of Glen Dye Moor EIA Scoping Meeting

Date: 11/12/2024

Location: Banchory Business Centre

Chaired by: [redacted] – Scottish Forestry

Minutes by: Scottish Woodlands [redacted])

In Attendance: [redacted] – Scottish Woodlands, [redacted] Scottish Woodlands, [redacted] – Finzean Community Council, [redacted] Scottish Water, [redacted] Botanical Society of Britain and Ireland, [redacted] Golden Eagle Specialist, [redacted] – Aberdeenshire Council [redacted] – River Dee Trust & Dee District Salmon Fishery Board), [redacted] James Hutton Institute, [redacted] – Merlin Specialist, [redacted] – Scottish Forestry, [redacted] – Scottish Forestry, [redacted] Scottish Forestry, [redacted] – Feughside Community Council, [redacted] PAR Equity, [redacted] PAR Equity, [redacted] – NatureScot, [redacted] Glen Dye Estate, [redacted] – Scottish Woodlands

In Attendance (Virtual): [redacted] – Coriolis Energy, [redacted] Golden Eagle Specialist, [redacted] – Outdoor Access, , [redacted] Aberdeenshire Council, [redacted] – Scottish Forestry

Apologies: None

1 Welcome and General Introduction

Scottish Forestry – Scottish Woodlands having been working on the EIA Screening Process for Glen Dye Moor for over 2 years and the purpose of this meeting today is to produce the Scoping Report which will include description of site, description of the proposal, objections, objectives. Everyone in this meeting is here to put across any issues that they think should be covered for a Scoping Opinion rather than a Sales Pitch. The meeting is e to identify significant issues to allow us to issue a Scope and Opinion Report which will then lead to an EIA Report.

Any views issued today will not prevent you from expressing views later on in the process. The Scoping Report will then be sent to Scottish Forestry which will then be sent to all parties involved in the meeting for their approval which will then lead to an EIA Report. We are hoping to have process concluded by late July 2025.

All habitats and species should be presented in terms of local, regional and national impacts so that these impacts can be considered.

Scottish Woodlands –

- Over the last two years, data has been compiled for the project, including constraints and survey information.
- Key constraints and sensitivities will be included in the EIA Report.
- Interactive map of Glen Dye Moor highlighted key factors: birds, landscape, and planting areas.
- Proposal for a Mosaic Woodland of around 2066 Ha: 1/3 commercial species (Scots Pine, Sitka Spruce) and 2/3 native species.
- Natural regeneration covers around 689 Ha.
- Project includes around 45 km of deer fencing and around 2.2 km of new tracks for timber collection.
- Deer management aims to reduce the population to around 2.5 deer per square kilometer (Red and Roe Deer).
- Total area is around 6300 Ha, with around 3500 Ha not involved in planting.

Briefly went through some of the project planning including: -

- Early Due Diligence – 2022
- Public Drop In Sessions – 2023
- Met With Local Community Groups, Neighbours, Site Visits – Started 2022
- Engaged With Regulatory Bodies – ie Scottish Forestry, NatureScot and Aberdeenshire Council
- Survey and Assessment Work – Preliminary Stage – 2022 and 2023 which included an ecological survey which covered all of the habitats, wildlife and ornithology on site.
    - Breeding Bird Survey
    - Peat Data Surveys
    - Archaeological Walk Over
    - Drone and Landscape Review

Aim to start work in 2025 however work will continue for a number of years due to the big scale of the site. Once the site is implemented, Scottish Woodlands will maintain the site and expect that natural regeneration will continue yearly.

Now at the point where it's going into a formal EIA Report Process however, we need to identify any issues and sensitivities to move forward with the proposal. Honing in on the core sensitivities but this list is by no means exhaustive. List of the Full Issues Log which was sent out before meeting.

Some written responses have come in to be read out and discussed as needed.

2. Key Points Discussed

Golden Eagle

- Discussion focuses on the need for further information.
- Golden Eagles are assumed to occupy the area.
- Eagles have a large footprint and have recently relocated their eyrie.
- [redacted] dropped from the call and was not able to contribute, further discussion is planned.
- Eagles are scoped in

Merlin

- [redacted] has researched Glen Dye Moor since the 1980s, focusing on Merlin territories.
- Merlin are open country species, tolerating limited woodland; approximately 9 territories exist with 4-5 pairs typically occupied.
- Five territories are not expected to face serious issues; two may be affected by plantings, with uncertainty regarding the remaining two.
- Proposed planting scheme has a 50/50 ratio of open ground to plantations, which should be acceptable for Merlins.
- Monitoring of Merlin populations will be essential due to their sensitivity to changes in habitat.
- Glen Dye Moor's Merlin population represents about 10% of Scotland's breeding pairs, highlighting its importance at a national scale.
- National population data is outdated, with the last survey conducted 12 years ago.
- The planned Mosaic planting scheme could benefit Merlins, but long-term monitoring is necessary.
- The Environmental Impact Assessment (EIA) will consider Glen Dye Merlin numbers on a national scale.
- Changes in landscape could potentially benefit Merlins, but outcomes remain uncertain.
- Monitoring will be incorporated into the project, despite not being part of the EIA itself.
- The EIA process includes monitoring measures as per Section 25 of the Regulations from 2017.
- International research, such as studies from Norway, can help predict impacts on the national population.
- Relevant topics like prey management and predator dynamics will also be examined in relation to Merlins.

- Merlins Scoped In

Hen harrier

- The scheme could be beneficial for Hen Harriers.
- Historically, there were about 4-5 pairs in Glen Dye 30 years ago, but numbers have since declined.
- No breeding pairs have been observed in the last 10 years, with possibly one sighting.
- There is anticipation that Hen Harriers will recolonize the area.
- It's important to highlight potential positive impacts of the scheme, alongside any negatives.
- Hen Harrier scoped out

Waders incl Curlew

- NatureScot supports scoping in waders, including Curlew.
- Collaboration with RSPB on design and habitat; design currently risks losing one breeding Curlew pair and potential displacements.
- RSPB recommends a long-term Curlew monitoring program; last Breeding Bird Survey was 2 years ago—another survey needed for an accurate baseline.
- Wader sightings have declined near Char Bothy possibly due to habitat changes; peatland restoration areas could benefit Curlew habitat.
- Under-grazing is a concern and should be included in the Scoping Study.
- Potential impacts of changes in dynamics on waders need further assessment; RSPB suggests additional surveys before tree planting.
- Neighbouring windfarm project conducted wader assessments; previous surveys indicated low concern for waders in the area.
- Waders scoped in

Priority Plants

- Key elements regarding sensitive flora have been communicated; impacts need to be covered.
- Important Mire site in Kincardineshire is affected by tree planting outside the project boundary. Regionally Important.
- This issue will be addressed under "Trans Boundary Impacts."
- Mountain scrub is located in high elevation, scattered pockets.
- There is no evidence of Mountain Willow in Kincardineshire, raising questions about species mix.

- Decisions will be informed by survey data from other known colonies.
- Concerns exist about introducing plants that have never been in the area.
- Regeneration from Scots Pine, Sitka Spruce, and other exotics needs to be addressed, regardless of EIA inclusion.
- Priority Plants Scoped in

River Dee SAC

- NatureScot generally supports the project in terms of the River Dee impacts.
- Assume presence of designated species; ensure no pollution during operations.
- Relaxed stance on salmon and mussels if conditions are met.
- Pre-operational otter surveys recommended before any work begins.
- River Dee SAC should be included in project scope.
- Proposal is positive for salmon population.
- Focus on water environment is crucial.
- New woodland creation with native broadleaf and natural regeneration is beneficial.
- River Dee SAC scoped in

Flooding

- National Flood Management perspective should be incorporated into the EIA process.
- No need for modelling; reference tree planting benefits for water percolation and interception.
- Include a paragraph in the EIA to highlight these benefits.
- Peatland restoration helps alleviate flood risk and utilizes land that can be flooded.
- Approximately 1800 ha of degraded peat will be restored; some areas are in reasonable condition.
- Flooding may impact the River Dee; reference needed in the report without quantification.
- Up to 25% of water can be intercepted before reaching the ground.
- Refer to the "Creating and Managing Riparian Woodland Guidance" for riparian corridor design.
- Use broadleaves to enhance shade and aquatic habitat for fish.
- Clear felling may exacerbate flood risks; need to assess timber harvesting methods in the EIA.
- Future restructuring of woodland will be regulated; Scots Pine is the primary commercial species.
- Flooding scoped out

Cultivation, Fencing and Roading

- Proposals to cultivate ground aim to minimize water runoff.
- Fencing and road designs require detailed planning to avoid disrupting natural water flow.
- Current proposal includes fencing the entire area.
- Plastic tree protection will be used along fence lines, with a preference for biodegradable shelters.
- Contingency plans for non-availability of biodegradable shelters include collecting them later.
- A Waste Management Plan will be developed for redundant tree shelters and overall waste.
- Each topic will address its specific environmental impacts (e.g., black grouse, bird strike).
- Cultivation. Fencing and roading scoped out as stand alone topics, scoped in under related to impacts on specific features.

Natural Regeneration

- Natural regeneration areas have been identified based on the site's dominant seed source, which is essential for predicting regeneration locations.
- Natural Regeneration Scoped out

Black Grouse

- NatureScot had no comments regarding Black Grouse.
- Leks were identified in areas targeted for habitat creation.
- Black Grouse is included in the project scope.
- Request for information on the national context of Black Grouse due to lack of data.
- Black Grouse Scoped In

Deer Management

- NatureScot recommended to Scope deer management in.
- NatureScot confirmed that they had seen the plan and were content with it.
- Deer Management is Scoped In

GWDTEs

- GWDTEs were identified in the NVC survey, guiding new woodland design.
- Semi-open woodland will be planted around GWDTEs, but not within their footprint.
- Discussions have taken place with NatureScot.

- GWDTEs are scoped in

Predator Control

- Predator control is not proposed but could be considered.
- Potential impacts on waders were noted.
- Removing predator control may significantly alter the ecosystem due to grazing cessation.
- Assumptions about impacts on waders, merlins, and ground-nesting species are necessary.
- Predator control will not be separately scoped but will be addressed in relation to other factors.

Prey Management

- Eagle foraging on site is impacted by prey community.
- Feedback indicates that native semi-open woodland and retained open ground will benefit the prey community.
- NatureScot recommends including prey management in the scope. This will be covered under the Eagle section of the EIA.
- Prey Community not scoped in as a stand alone topic, to be addressed with eagles.

Butterflies and Moths

- Data from Butterfly Conservation Scotland has informed design considerations for the Large Heath Butterfly.
- Their habitat is unsuitable for afforestation, providing inherent protection.
- Operational mitigations will prevent machinery from disturbing the colony during the flying period.
- The nearest significant colony is located at a considerable distance. This colony is isolated.
- Commitment to further monitoring of the butterfly population in collaboration with Butterfly Conservation Scotland.
- Monitoring will align with peatland work, as those areas are likely to be relevant.
- Scottish Woodlands proposed to scope out butterflies from the EIA, citing no habitat impact.
- Scottish Forestry recommends scoping the large heath butterfly population in, as its significance is still unknown.
- Large Heath Butterfly scoped in

LNCS

- LNCS includes a geological geomorphic fluvial complex.
- Proposal to extend the boundary south to include GWDTE features.

- LNCS is of local importance.
- LNCS is scoped in.

Biodiversity (other)

- Questions raised about surveys conducted and experts consulted for other taxonomic groups.
- Ecological habitat and species surveys, along with data record checks, were performed by expert ecologists.
- Specific missing examples mentioned include dragonflies and damselflies.
- Open engagement is encouraged to identify any missed issues.
- Meeting purpose is to gather input from knowledgeable individuals about the site.
- A robust process has been followed, including NESBREC data searches, to ensure no important data is overlooked.
- No other Biodiversity features have been scoped in.

Wildfire

- Wildfire impact is unchanged; no recreational improvements proposed that could increase fire risk.
- Concerns raised about car park expansion potentially increasing visitor numbers.
- Site previously used as Grouse Moor; now not managed as such.
- Management of wildfires is crucial; cessation of traditional burning practices increases fuel load.
- Limited data available for assessing wildfire likelihood and habitat impact.
- A Wildfire Management Plan will address wildfire intensity based on habitat changes.
- The plan will ensure appropriate resources are available for potential wildfire occurrences. Fire breaks are planned along existing tracks and shaded fuel breaks as well.
- Wildfire management will be included in the Environmental Impact Assessment (EIA) report.
- Stakeholder engagement is essential for evidence gathering and addressing neighbouring land managers concerns.
- Wildfire is scoped in

Archaeology

- Historic Environment Scotland provided comments via letter due to their absence. This was read out at the meeting.
- They reviewed the project regarding heritage interests, noting no Scheduled heritage sites within the application boundary.
- Cairn O'Mount, a scheduled monument with prehistoric burial cairns, is located just east of the site.

- The project could risk accidental damage to the monument from construction activities; mitigation measures must be included in the EIA.
- The proposed woodland (2/3 native, 1/3 commercial) is mostly not earmarked for planting near the monument.
- Potential impacts on the setting of Cairn O'Mount need assessment, especially regarding views and landscape character.
- No comments were given on peatland restoration as the site boundaries lack heritage interests.
- Council representatives confirmed that detailed comments on mitigation will occur at the planning application stage.
- Discrepancies noted between archaeological survey records and EIA maps; updates are welcomed.
- Archaeological surveys are deemed necessary, and archaeology should be scoped in for the EIA.
- Archaeology scoped in

Cumulative Impacts

- Discussions included the cumulative impact of wind farms on land use.
- Recent agricultural presence is minimal; sheep are no longer used for grouse moor management and are not present.
- No WEAG proposal is planned; land use changes will be addressed in the site description.
- Peatland restoration will also be considered in cumulative impact assessments.
- NatureScot recommends integrating cumulative impacts throughout the entire report and assessments.
- Cumulative impacts will not be identified as standalone issues.
- Cumulative Impacts scoped out as stand alone issue.

Landscape

- Scottish Forestry previously commented on the scheme; my predecessor was involved.
- A landscape and visual impact assessment should be included in the EIA.
- The site features undesignated landscape character and is part of a regional special landscape area (SLA). Regional importance.
- There are notable iconic views in the wider area.
- Ladscape scoped in

Water Supplies/Water Assets

- Scottish Water assets on site are no longer used and require decommissioning for health and safety.
- These assets should currently be scoped in but will be scoped out once decommissioning is complete.

- The proposal does not impact the abandoned assets.
- The decommissioning is a Scottish Water health and safety issue, not related to the scheme.
- The reservoir will remain; if it ceases to be a raw water supply, it could be enhanced as a biodiversity feature.
- Nutrient input and shading may occur around the reservoir, opening more biodiversity options.
- A formal request will be sent to the Scottish Water legal and estates team for further action.
- Drinking water protection area is a separate consideration from the physical asset issues.
- Scottish Water Assets scoped out

Recreation/Access

- Main concern is the recreational impact on access; fencing plans will ensure no restrictions.
- Existing infrastructure will be protected and improved, noting Clachnaben.
- Survey work was conducted on the Clachnaben footpath for Scottish Woodlands.
- The current state of the footpath is causing significant landscape erosion.
- Footpath repairs are needed to mitigate environmental impact.
- An open access approach will be adopted, with careful consideration of signage and access points (e.g., vehicle gates, pedestrian gates, stiles).
- Compliance will follow the Land Reform Scotland Act, not just the Outdoor Access Code.
- An outdoor access plan should be considered to manage public access alongside land management operations.
- Proposal includes doubling the car park footprint, which is more about contextualization than EIA scope.
- Local recreational users (e.g., cycling, horse riding) were consulted; bridal gate proposed for access.
- E-bike access will be facilitated but not newly introduced; existing access will be supported.
- A waste management plan is needed due to potential litter issues from the expanded car park.
- Recreation scoped in

Cultivation/Carbon/Soils

- Ground preparation is critical for managing water flows, carbon loss, and preventing early droughts in trees.
- Detailed planning for ground preparation should be scoped in to assess potential impacts.

- Cultivation will follow Scottish Forestry's guidance, which outlines best practices to minimize carbon release.
- Quarrying and borrow pits must be included in planning and served by proper settlement ponds.
- Clarify whether rock is imported or generated on site, as this is often overlooked.
- Ensure crossing points over watercourses are robust and avoid introducing products into flowing water.
- Following the 2021 cultivation guidance minimizes risks associated with ground preparation.
- Practices like scarification and mounding are preferred over outdated methods like deep ploughing.
- No planting will occur on deep peat; the degree of disturbance will be carefully considered.
- Invert mounding will be the main cultivation method, recommended for certain soil types.
- It's important to report on ground preparation practices to minimize potential impacts.
- The scale of the proposal is more significant than the carbon load; alternatives will be assessed to reduce impacts.
- Ground preparation is scoped in along with peatland.

Drinking Water Protection Area (DWPA)

- Most mitigations align with standard forestry practices, with key differences in fuel storage guidelines.
- Scottish Water requests an increased buffer for fuel storage to 50 meters.
- Spill kits will be provided to minimize risks.
- Strategies for diffuse pollution planning are included.
- Drinking Water Protection Area scoped in

Summary

Scoped in:- Merlin, Waders, Plants, River Dee SAC, Black Grouse, Deer Management, Recreation, Eagles, Butterflies and Moths (Large Heath Butterfly), LNCS, Wildfire, Archaeology, Landscape, Ground Preparation, Peatland, Drinking Water, GWDTE

Other comments

- Regeneration is not a primary topic for the review.
- The focus is on headline topics.
- The monitoring program aims to manage the long-term seeding of planted trees in designated open ground areas.

Scotch Woodlands will produce a report of this meeting, a scoping report which they will then plan to issue to us, Scottish Forestry on the 6th of January. We then have till the 11th January [Corrected to 11th February post meeting] to form a scoping opinion which then informs the EIA. The EIA report is then drafted and when that's produced it is consulted on, which gives everybody another chance to formally comment. So this is not the end of the process in terms of opportunity to comment.

Normally, we require that that the scoping report is signed off by the attendees of this meeting. That is going to be difficult I think to achieve given that we're away to enter the festive period. Rather than hold up the process, Scottish Forestry would be content to receive that on the 6th January, but before we issue our scoping opinion this would have to be signed off. So that gives some more time to get everybody around this table to approve.

The timeline for the EIA Consultation period is 30 days.

Scottish Woodlands has volunteered to attend the next community council meeting.