

Perth & Argyll Conservancy

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██████████
Scottish Woodlands
Loghgilphead
Argyll

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Conservator
Cameron Maxwell

By email

22 December 2017

Dear ██████████

Upper Largie WC - Forestry (EIA) (Scotland) Regulations 2017

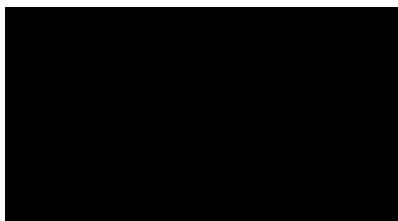
We refer to your application for our screening opinion as to whether the forestry project you have proposed at Upper Largie, by Kilmartin, Argyll is an EIA forestry project (is likely to have significant effects on the environment by virtue of factors such as its nature, size or location) and therefore requires our consent under regulations 3 and 7.

In making this screening determination under regulation 11, we have taken into account the relevant selection criteria set out in schedule 2 of the regulations, available results of any relevant assessment of the effects of the forestry project proposed and the information you have provided under regulation 12 (request for a screening opinion).

We can confirm that the work you propose is an EIA forestry project and requires our consent. In Annex 1 of this letter, we have set out the statement of reasons for our decision under regulation 11(3). This determination will be made publicly available.

Please contact us if you wish to take this project to the scoping stage.

Yours sincerely



Cameron Maxwell
Conservator

Statement of reasons

In this case the relevant criteria in schedule 2 are:

- Design of the forestry project
- The sensitivity of the area with regard to:
 - Landscapes and sites of historical, cultural and archaeological significance
 - Existing and approved land use – visitor access
 - Biodiversity.

This proposal is set in a nationally important and sensitive area for archaeology and cultural heritage, Kilmartin glen. From the information received, the approach and design of the proposal doesn't take proper account of the national importance of either the burial cairn or standing stones within the proposal area or of the link with the archaeological importance of the wider glen. A distinctive part of this is the linear cemetery feature of the archaeology in the glen and the importance of connectivity between the scheduled sites in the proposal area and the other archaeological features along the glen floor and to the north.

It is not clear what impact the conifer woodland around the burial cairn (site 19) will have on views to it or from it at maturity. A larger open area has been created around the burial cairn in the revised proposal but this seems to be at the expense of the previous open areas around the burns to the SW and SE of the cairn.

No attempt has been made to consider the views from Kilmartin museum, which is a key visitor attraction in the area; from the main road or elsewhere in the glen (other than from the castle).

The area appears to be within the Knapdale/Melfort Area of Panoramic Quality (a local authority designation). This would be a relevant consideration.

Our concern also applies to the scheduled, Carnasserie castle in terms of its landscape setting. For example in the revised proposal, an area of mixed conifer has been removed from south west of the castle but appears to have been added to the east of the castle, blocking views of the castle from the main road.

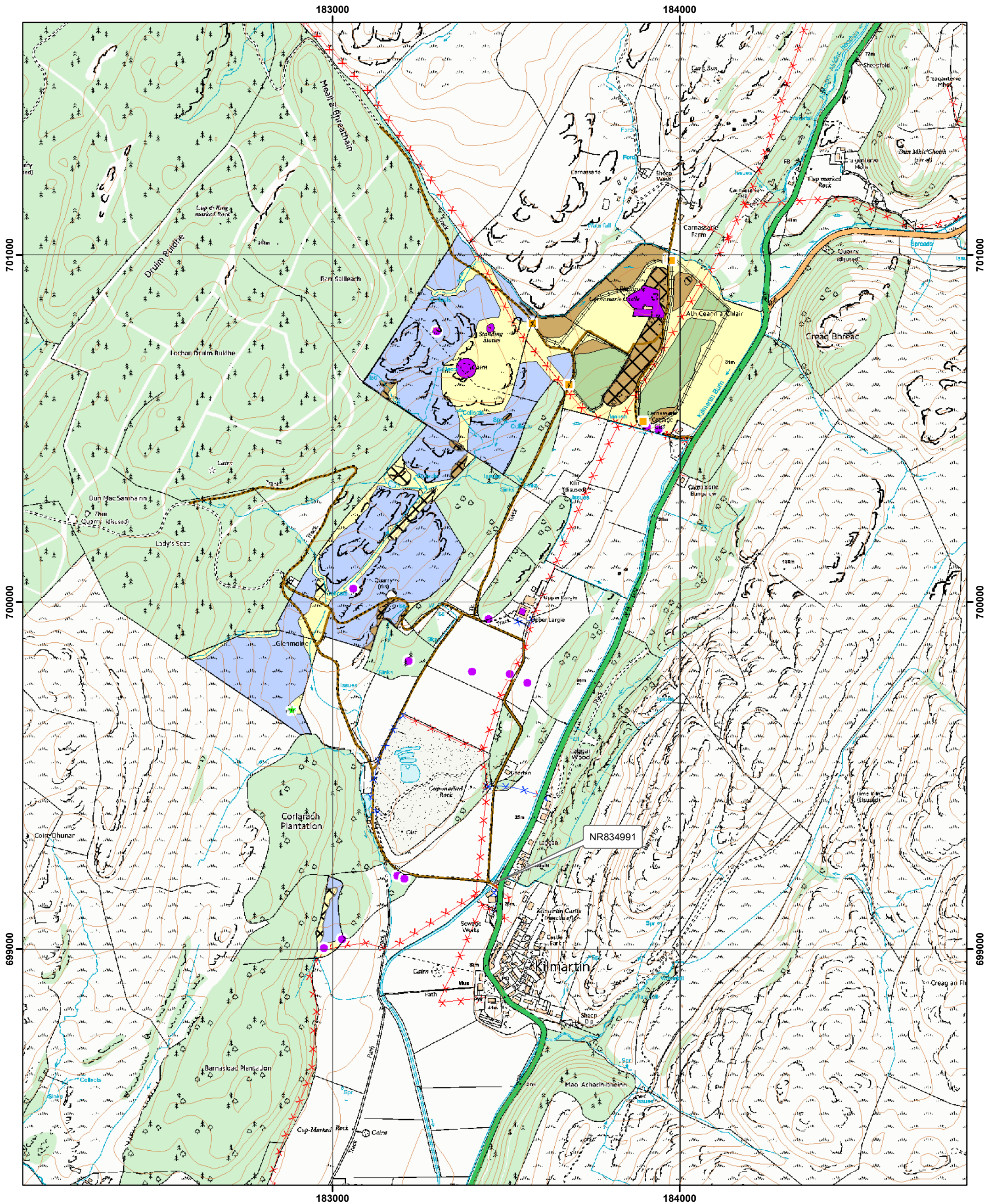
On biodiversity, the breeding birds survey concludes that the area to be planted includes a high proportion of UK songbird species of the highest conservation concern and that this is a relatively scarce feature in Argyll. It also notes that there would be a cumulative reduction in red listed conservation species locally. However, the report doesn't suggest mitigation (other than not to plant) and it is not clear how these concerns are dealt with in the revised proposal.


It is not clear whether the ecological survey provides any recommendations about the habitats that should be protected and what mitigation will be appropriate. It is not clear how the habitats including relict or veteran trees and semi-natural woodland identified in the target notes, have been considered in the revised proposal.

These impacts are on archaeology, cultural heritage and landscape (including visitor experience and access) and biodiversity. These impacts haven't been adequately addressed or mitigated in the proposal and are likely to have significant effects on the environment.

There are also a number of issues which the proposal would need to address to meet the UK Forestry Standard:

- It is not clear whether the woodland design takes account of Forest Enterprise Scotland plans for their forest to the west in terms of landscape and habitat networks.
- Sustrans cycle route 78 runs through the site and this doesn't seem to have been mentioned (or addressed) in the operational plan or other documents provided.


















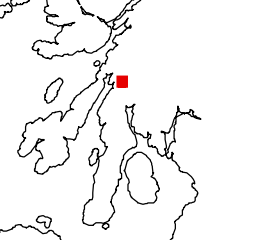
**Scottish Woodlands**

Upper Lachie

Species Map
v3

Created On: 12.09.2017

- | | |
|---|---|
|  Non Scheduled Archaeology |  Scheduled Archaeology |
|  Gate |  Sitka Spruce - 33.23ha |
|  Memorial Plaque |  Mixed Conifer - 5.03ha |
|  Deer Fence - 2907m |  Native Broadleaves - 2.98ha |
|  Track |  Open Ground - 22.39ha (4.58 eligible) |
|  Overhead Powerline |  OL - Existing Broadleaves - 3.65ha |
|  Underground Powerline |  OL - Deep Peat OG - 1.26ha |
| |  OL - Quarry - 0.06ha |



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1:10,000
Scale Correct at A3

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