



Friends of the Ochils

Mr Mike Thomson
RTS Forestry
Muthill Road
Earnside House
Crieff
PH7 4HQ

Viewfield
Muckhart
Dollar
Clackmannanshire
FK14 7JN

26th November 2018

Dear Mr Thomson

Response to the Blackford Farms Woodland Creation – Harperstone/Glentye, Sheriffmuir

We would ask that the following issues are addressed during the scoping stage for the forestry planting proposal at Glentye Hill. We apologise for the delay in responding but, for a voluntary organisation with limited resources, the timescale permitted for making a response has been very short and we have had limited opportunity to liaise with other organisations. However, we are happy to discuss further the points raised if that is required.

Another reason for the delay in submitting our comments has been our difficulty in obtaining from Forestry Commission Scotland the Issues Log for the adjacent forestry development, again being undertaken by Blackford Farms, on Carim. If and when we are able to obtain the Issues Log we may wish to make

further representations on the Harperstone/Glentye development as the two developments are directly connected, particularly in relation to matters such as cumulative impact.

1. **Access.** At present, access to the area is possible from many directions. However, once the ground has been prepared, trees planted and deer fencing erected, any such access becomes very problematic. Hill walkers, fell runners, cyclists etc will have their statutory right of access seriously curtailed by the forestry development. The impact of the development on access must therefore be fully evaluated and appropriate mitigation measures taken.
2. **Deer fencing.** Given the large area that has already been developed for forestry in the western Ochils – Jerah, Sheriffmuir Battlefield, Carim etc, the length of deer fencing, often with long stretches without any crossing points, is becoming a serious issue. The attendant access issues as well as the visual impact of such fencing should be addressed. For example, ways of sharing fencing between two developments should be considered as a matter of urgency. The avoidance of deer fencing through appropriate deer management should also be considered to avoid the miles of fencing that is beginning to appear in the Ochils.
3. **Archaeological Sites.** The protection of archaeological sites, particularly the Atlantic Wall and around the Glentye Farmstead is essential. The area around each should be left unplanted so that the significance of the site can be fully appreciated, including associated field systems.
4. **Wildlife.** We have seen the scoping response submitted by Scottish Wildlife Trust (SWT) and we fully endorse their recommendations. The impact of such a large area of forestry on the biodiversity of the western Ochils will be considerable and appropriate surveys should be carried out before deciding exactly which areas should be planted and with which species of tree. The option of not planting should always be available.
5. **Peat.** We would wish to see a comprehensive peat survey carried out to ensure that planting is not undertaken on ground where the peat depth is greater than 50 cms (See SWT response).
6. **Landscape.** The impact of such a large area of planting on the landscape and the enjoyment of that landscape by visitors cannot be underestimated. The Ochils are visited by thousands, including those driving or cycling along the Sheriffmuir Road. The long distant views

northwards from the Sheriffmuir Road towards the Highlands are particularly enjoyed as well as views within the hill range. Those views should be protected. In addition, we would want careful attention to be paid to the edges of the planting so that unnatural straight lines of trees are avoided. Also, the sudden demarcation between dense blocks of conifers and the open hillside should be avoided; instead a more gradual transition from trees to open hillside should be achieved.

7. **Cumulative Impact.** The growing cumulative impact of forestry in the western Ochils is giving serious cause for concern. Two issues are particularly important. Firstly, extensive planting, as is taking place and is proposed within the western Ochils, impacts significantly on habitats and the species of plants and animals within those habitats. Secondly, the impact on the landscape of such extensive planting in the western Ochils is significant. Decisions relating to the Harperstone/Glentye planting should therefore not be taken in isolation but in conjunction with both planting that has already been undertaken as well as any new planting that is being planned but not yet at the scoping stage.
8. **Local/Special Landscape Areas.** The proposed planting lies within the Ochils Local Landscape Area designated by Stirling Council whereby the adjacent planting that has already taken place at Carim would seem to overlap the Stirling Council and Perth and Kinross Council (PKC) LLA/SLAs boundaries. Special/Local Landscape Areas are designated to safeguard and enhance the character and quality of landscapes, as well as to safeguard and promote important settings for outdoor recreation and tourism. We would therefore ask that the SLA/LLA designations are fully taken into account when scoping the Harperstone/Glentye woodland creation scheme.
9. **Local Authority involvement.** Because of the position of the local authority boundary in this area, we would wish to see a coordinated approach being adopted between Stirling Council and PKC when determining the full impact of forestry planting in this area. Both authorities have their own Forestry and Woodland Strategies and each strategy should be applied in a coordinated way, particularly in relation to issues such as a cumulative impact (see above).

I trust that the above comments are helpful at this stage of the Harperstone/Glentye planting proposal. However, we may wish to submit

further comments once we have access to the Issues Log for the Carim planting.

Yours sincerely

Stuart Dean. Chair, Friends of the Ochils

Email: spdean@lineone.net

Tel: 01259 781 551

Mob: 07710 522 752