

Forestry response to SEPA letter ref PCS/164256 dated 2 April 2019

7. Forest removal and forest waste

*7.2 Section 3.4.32 states that all merchantable timber will be harvested and extracted, but states that mulching of unmerchantable timber may take place. We must **object** until further information is provided on whether any mulching is proposed, the quantities proposed and the state and condition of the failed crop. As access is being created by the windfarm, it is not clear why any material would need to be left on site or mulched. Recent investigations into mulching on failed forestry sites have concluded that they do not aid in peatland restoration, and innovative ways to remove the timber from site have been recently applied with success.*

The forest baseline data describes the woodland as Scots pine planted in 1985. A high proportion of this planting has failed. The woodland is therefore primarily suited to creating a habitat (for deer) rather than timber production. Given the exposed location, variable canopy cover and a relatively young age for Scots pine, the timber felled will not be producing any suitable sawmilling material and therefore the suitable markets are chipwood or biomass.

Given the relatively small area of trees to be felled (4.09 ha), section 16.7.2 and figure 16.3 Felling Plan combined with the low volume per hectare the simplest method is for whole tree harvesting to the biomass market, which would include any smaller otherwise unmarketable trees. This method will provide nil waste in terms of SEPA guidance document WST-G-027, "Management of Forestry Waste" (SEPA, 2013).

For clarity this harvesting is for all timber above ground and will not include tree stump removal (Forestry Commission Research Note "Environmental effects of stump and root harvesting" (Forestry Commission, 2011)) unless for construction or other habitat purposes.

The following figures from "Forestry Commission Booklet No. 34, Forest management tables" give guidance as to the volumes to be removed.

Forestry Commission Booklet No. 34 Forest management tables				
Table 58 Scots pine YC 6				
		Cumulative production		
Age	Volume (m3) per ha to 7cms	Area (ha)	Total volume (m3)	Equivalent lorry loads
35	103	4.09	421.27	17