

9. Forestry

9.1 Introduction

- 9.1.1 The purpose of this chapter is to report on the assessment of the impact on forestry of the Proposed Development through its construction, operational and decommissioning phases. Initial surveys of the Site and the immediately adjoining forest areas were undertaken between November 2024 and January 2025. The forest area assessed was considered in terms of the requirements for tree removal for the safe construction and operation of the Proposed Development and the required wind capture to deliver the appropriate efficacy of the development.
- 9.1.2 In addition, where the impact of the proposed tree felling could be expected to impact on the wind stability of the remaining forest out with the proposed felling area then additional survey work was undertaken to assess the need for additional felling to the nearest windfirm edge. This additional felling is termed Management Felling and would only be undertaken with the agreement of the individual landowner(s). As such the management felling is excluded from the assessment of significance¹.
- 9.1.3 The assessment of the projected tree clearance also considered the designations of any areas of forest.
- 9.1.4 This revised chapter provides an assessment on the potential impacts of the Proposed Development on the forestry resource and the likely significant effects resulting from the construction and operation of the proposed wind turbines and associated infrastructure. The specific objectives of the chapter are to:
- describe the current baseline;
 - describe the assessment methodology and significance criteria used in completing the impact assessment;
 - describe the potential effects, including direct, indirect and cumulative effects;
 - describe the mitigation measures proposed to address the likely significant effects; and
 - assess the residual effects remaining following the implementation of mitigation measures.
- 9.1.5 The chapter is supported by **Figures 9.1 to 9.5 in Revised Volume 2a**.
- 9.1.6 An assessment of the likely effects of forestry felling is reported separately as applicable in the following chapters of the Revised Environmental Impact Assessment Report (Revised EIA Report):
- Chapter 5: Landscape and Visual Impact Assessment;
 - Chapter 6: Ecology;

¹ It is worth noting that should the landowner decide to undertake management felling this would require separate approval through Scottish Forestry and is further explained within Sections 9.3.2-9.3.5.



- Chapter 7: Ornithology;
- Chapter 8: Geology, Hydrology, Hydrogeology and Peat;
- Chapter 11: Traffic and Transport; and
- Chapter 12: Noise.

9.2 Legislation, Policy & Guidance

9.2.1 This assessment is carried out in accordance with the principles contained within The Forestry and Land Management (Scotland) Act 2018.

9.2.2 This assessment is carried out in accordance with the principles set out in the following documents:

- The UK Forestry Standard 2017;
- Scotland's Forestry Strategy 2019;
- The Scottish Government's Policy on the Control of Woodland Removal 2009 (CoWRP); and
- Scottish Government's policy on control of woodland removal: Implementation guidance 2019.

9.2.3 In addition, NPF4 Policy 6 (forestry, woodland and trees) describes the policy intent to protect and expand forests, woodland and trees. It has the policy outcome of woodland and trees on development sites being sustainably managed. It further states that development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits. This has been taken into account during the development of the Proposed Development and when identifying potential mitigation and compensation for any changes in the forestry baseline.

9.2.4 Furthermore, the following best practice guidelines/guidance has been taken into account:

- Forest Industry Safety Accord (FISA) guidance.
- SF & SEPA Guidelines e.g. to ensure protection and enhancement of the water environment during felling and construction.
- UK Forestry Standard Guidelines (UKFS).



9.3 Consultation

9.3.1 **Table 9.1**, below, summarises the responses that were received during EIA Scoping.

Table 9.1: Scoping Consultation Responses

Consultee	Scoping Response	Applicant Response	Further Consultation
East Ayrshire Council	Details of any compensatory forestry planting should be detailed within the EIA Report and accompanied by relevant figures to demonstrate areas of loss and compensatory planting as relevant. Some details of species composition and design of any compensatory planting areas would be beneficial. It may be worth considering native broadleaf species if appropriate. Scottish Forestry would be able to advise in more detail as to the expectations of a forestry chapter or any relevant guidance.	Noted. See Scottish Forestry Response below. The potential impacts of the Proposed Development and any proposed compensatory planting are detailed in Section 9.9.2 Potential broadleaf planting will be considered in consultation with the landowners and is proposed as one of the potential measures to be implemented as part of the Biodiversity Enhancement Management Plan (BEMP).	Consultation with forestry operators is ongoing.
	Any potential impacts on Ancient Woodland will also require to be considered, although there do not appear to be any within the application site itself, though there are areas of Ancient Woodland immediately adjoining the site boundary.	Noted. Potential adverse impacts on Ancient Woodland have been assessed in Section 9.5.12 below.	N/A
	It will be expected that compensatory planting takes place within the site as a first preference, though where this is not possible, it will be expected to take place within the East Ayrshire local authority area. Whilst the Planning Authority would have no particular concerns regarding any enhancement of public access or recreational attractions which may be delivered on the site itself, it would not consider this as suitable alternative mitigation as compensation for loss of woodland covers and consider	Noted.	N/A



Consultee	Scoping Response	Applicant Response	Further Consultation
	only replacement/compensatory planting would continue to deliver ecological and biodiversity benefits to mitigate for losses of woodland.		
SEPA	<p>If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.</p> <p>The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.</p>	<p>Noted. Alternative forestry felling strategies that were considered were discussed in Chapter 3: Design Evolution and Alternatives.</p> <p>Various options were still under consideration at the time of writing but will be finalised prior to commencement of the forestry and other impact assessments in the EIA Report.</p>	N/A
Scottish Forestry	Requires additional information on two questions. Q9.1 agrees with proposed scope and methodology however - felling period where most of the felling will occur has already past and needs more information in order to provide an opinion in the fullness of time. Q9.2 requires more information to agree with alternative mitigation strategies for compensatory planting as these have not been set out and needs more information.	<p>Noted.</p> <p>Up to date baseline information on felling will be provided in the EIA Report.</p> <p>Proposed mitigation and compensatory planting measures will be discussed in the EIA Report.</p>	<p>Yes – further consultation has been undertaken with the landowner to obtain further information on felling and the forestry management plans, as well as requirements for potential keyhole felling.</p> <p>Further engagement with Scottish Forestry is planned, once more detail is available regarding the extent of felling to be proposed.</p>



Consultee	Consultation Response	Applicant Action
Scottish Forestry	Require the project to address the guidance of Scottish Government policy on the control of woodland removal and section 6 of NPF4	The applicant is committed to addressing the protection of areas of designated woodlands and also addressing through agreed mitigation the model for the delivery of appropriate local environmental compensation works to address the net loss of woodland.
FLS	Ongoing dialogue to address the methodology of tree felling and removal including the mitigation of impacts on ongoing forest management	The applicant will continue to work with FLS to ensure the project addresses the

9.3.2 **Table 9.2**, below, summarises the responses that were received relating to forestry following submission of the May 2025 Application.

Table 9.2: Consultee Comments on May 2025 Application

Consultee	Summary of Comments	Response
Scottish Forestry (9 th July 2025)	[9.4.15] Proposal for 159.2 ha of management felling to deal with windblow risk. Where is the assessment of the areas of Management Felling proposed showing why the selected areas require felling to reach these 'windfirm edges' ? This is not discussed or any analysis provided in the forestry chapter.	The 159.2 ha management felling was the worst-case scenario to mitigate against potential wind blow on the Site, by felling to wind firm edges. Having removed T2 and T13 from forested areas, the estimated management felling that will be required has reduced by 21.3 ha to 137.9 ha (see paragraph 9.4.15). However, management felling will only be undertaken with the agreement of the individual landowner(s) and in consultation with Scottish Forestry. As such the management felling is excluded from the assessment of significance.
	If the full 159.2 ha of management felling was to be undertaken on top of the infrastructure felling, given the current state of the forest with recently felled coupes where the restocking is yet to reach the immature stage at 2m of height, this would leave only 40% of the North Kyle LMP / Breezy Hill boundary area as having mature forest or designed open ground. As such, a strong reasoning needs to be provided to justify the proposed areas of management felling.	As stated in 9.4.16, all management felling will be undertaken only with the approval of both the landowner and Scottish Forestry and this approval will only be granted by Scottish Forestry where the landowner is committed to replanting the same area. As a result of this legal commitment which can be enforced through the Forestry and Land (Scotland) Act 2018, this potential effect has been scoped out of the assessment. Furthermore, it is understood through ongoing discussions with FLS that the existing Land Management Plan will be varied to address the requirements for management felling attributable to the introduction of infrastructure felling for the Proposed Development.
	The management felling that will be approved via the LMP does not align with the current LMP felling proposals. The	Further addressed in Section 9.6.5: The Proposed Development has no mechanism to control felling and replanting/restocking within those areas vulnerable to windblow and out with development footprint. However, the applicant is committed to liaising with landowners to agree that these areas will be felled to mitigate the risk of forest damage through windblow. The felling of these areas would require the agreement of the relevant landowners and would be delivered in line with a felling permission to be applied for by the landowner to Scottish Forestry (SF) on behalf of the Scottish Ministers. It is anticipated that each felling permission would be granted



Consultee	Summary of Comments	Response
	'management felling' covers coupes labelled as phase 2/phase 4/phase 6/phase 7 felling. Any 'management felling' that will occur for the windfarm development between 2025-27, should be in phase 1 of the LMP.	<p>subject to a condition, to ensure that the felled woodland is replanted. In terms of the Forestry and Land Management (Scotland) Act 2018 ("2018 Act") and associated regulations, in making a decision on any felling application, the Scottish Ministers acting through SF must have regard to their duty under section 2 to promote sustainable forest management. In addition, SF are entitled to impose conditions in relation to the retention of, or increase in, woodland cover. SF normally expect an area which has been clear felled to be restocked and will normally attach what is referred to as a continuing condition to felling permissions to secure the restocking.</p> <p>Should the landowner not agree to pre-emptively fell the woodland required to create a more windfirm edge (to mitigate the windblow effects) and the trees subsequently suffer from windblow, it is within the control of SF, on behalf of Scottish Ministers, using powers contained in the 2018 Act and associated Felling (Scotland) Regulations 2019 to issue felling and restocking directions. In terms of section 34 of the 2018 Act, if it appears to SF that felling of trees is required to prevent deterioration or further deterioration in the quality of timber comprised in the trees or to improve the growth of other trees or to prevent or reduce harm caused by the presence of the trees, it may serve a felling direction on the owner of the land requiring the felling of the trees. These powers could be exercised to address the effects of windblow. Felling directions may also be issued subject to conditions addressing the retention of or increase in woodland cover. SF can therefore secure the replanting or restocking of woodland which has been felled.</p>
	[9.7.7] Where will the construction compounds and temporary roads go?	<p>Figure 9.3 details the location of access tracks. The locations of the access tracks are also shown in Figure 1.2b and are described in Revised Chapter 2: Project Description (see Paragraphs 2.3.24-2.3.29)</p>
	[9.8.2] We will need more information regarding compensatory planting, i.e., how they area has been assessed, where the compensatory planting will be sited, planting plan etc.	<p>The location for compensatory planting has yet to be identified and Scottish Forestry would be involved in agreeing on its location. It is anticipated that this will be addressed through a planning condition(s).</p>
	All of the Habitat Management Areas (HMAs) are within the North Kyle LMP area. These will need to be reflected in the North Kyle LMP.	<p>Please refer to Revised Chapter 6: Ecology and the revised Technical Appendix 6.6 (Outline Biodiversity Management Plan). The OBEMP has been compiled in consultation with North Kyle Wind Farm management and ECoW, and has taken the objectives of the NKWF into account. As the HMAs are located offsite, within the North Kyle Wind Farm, the OBEMP will be implemented alongside the North Kyle Wind Farm BEMP.</p>



9.4 Assessment Methods & Significance Criteria

Methodology

- 9.4.1 The assessment of potential effects of the Proposed Development on the forestry within and around the Site was undertaken by:
- Establishing the forestry baseline;
 - Identifying the potential effects of the Proposed Development on forestry over the lifecycle of the development; and
 - Assessing the significance of any identified potential effects on forestry.

Establishing the Forestry Baseline

Forestry Study Area

- 9.4.2 The study area included the North Kyle Forest (owned by the Scottish Ministers on behalf of the Nation and managed by Forestry and Land Scotland (FLS)), and Ravenscroft Forest which is managed by Scottish Woodlands on behalf of a private owner. The Forestry Study Area is shown on **Figure 9.1**.

Desk Study

- 9.4.3 Utilising a range of online data including GIS mapping data from Nature Scot and Scottish Forestry, an assessment of any conservation related designations attributed to the site by these organisations was undertaken. The landowners and forestry managers within the Forestry Study Area also provided local forest data, including forest management and forest felling plans, where available.

Field Studies

- 9.4.4 Between November 2024 and February 2025, a number of site visits were undertaken to review onsite conditions and validated the forest descriptions provided by the data.

Scope of Assessment of Effects

- 9.4.5 Once the baseline had been established, and the design of the Proposed Development had been defined (refer to **Chapter 2** for a detailed description of the Proposed Development), the assessment of potential effects was undertaken as follows:
- identifying likely forestry effects;
 - assessing whether each likely effect is adverse or beneficial in nature;
 - identifying the sensitivity of identified receptors;
 - identifying the magnitude of any potential effects on receptors; and
 - assessing the significance of any likely effects.



- 9.4.6 Where an effect is likely to be significant, measures were identified to avoid, reduce or mitigate such significant effects.
- 9.4.7 An assessment of the significance of any residual effects following application of the mitigation measures was also undertaken.

Approach to Assessment of Effects

- 9.4.8 The assessment follows a structured methodology, drawing on relevant legislation and guidance, including the UK Forestry Standard (5th Edition 2023 UKFS), woodland designations such as The Scottish Government's Ancient Woodland Inventory (last updated 2024) (AWI), and the Native Woodland Survey of Scotland (last updated 2024) (NWSS). Data sources include web-based information from Scottish Forestry, aerial imagery, and field surveys conducted to assess woodland type, structure, and health. Where available, from the forest owner, forest data including compartment records and forest plans was reviewed and utilised within the report. Survey methods involve site inspections to record tree species, age class distribution, canopy cover, and signs of natural regeneration. The study area included encompasses the Proposed Development and the immediately adjoining forest. Where the forest including designated woodlands these were recorded and assessments of opportunities to mitigate the tree clearance works such were presented. Designated woodlands include all sites recorded within the AWI, and Classified woodlands includes those recorded within the NWSS including Ancient Woodland Sites of Semi-Natural Origin (AWSNO), Long-Established Woodlands of Plantation Origin (LEPO), and Native Woodlands identified in the NWSS.

Potential Receptors Scoped into the Assessment

- 9.4.9 The receptors requiring assessment are:
- the forest areas within North Kyle and Ravenscroft; and
 - any designated or classified native woodlands within the study area.

Potential Receptors and Effects Scoped out of Detailed Assessment

- 9.4.10 Following careful consideration and using professional judgement, a number of potential receptors or impacts have been 'scoped out' of the detailed assessment reported in this chapter. Some of these effects were included in the list of potentially significant effects set out in the EIA Scoping Report (dated May 2024) but were subsequently assessed as unlikely to be significant during the initial assessment. Effects scoped out of assessment comprise effects on shelter, effects on deer stalking, effects of windblow, and cumulative effects as detailed below.

Effects on Shelter

- 9.4.11 Effects on shelter are typically attributed to the removal of agricultural shelterbelts in more exposed upland locations. Partial removal of some forestry shelter previously available to adjoining farmland is proposed as part of construction of the Proposed Development. However, there would be sufficient residual shelter in the area, and the likely effect of the loss resulting from construction and operation of



the Proposed Development is not anticipated to be significant and has therefore been scoped out of detailed assessment.

Long term loss of broadleaf and native woodland including sites identified within the registers of ASNW and NWSS native woodland areas.

- 9.4.12 Within the Site there is one small area (1.4 ha) of broadleaf woodland situated between turbines 6 and 11. While not being designated as Ancient woodland this is identified within the Native woodland survey of Scotland as upland mixed Ashwood. The woodland comprises of scattered trees and as the area is passed through for a distance of c 85 m by the infrastructure road it is anticipated that no tree clearance will be required. In this case the impact of the Proposed Development is not anticipated to be significant and is scoped out of further assessment.

Effects on Deer Stalking

- 9.4.13 In relation to deer stalking, the only adverse effect likely to occur as a result of the Proposed Development is that which would be potentially experienced as a result of the tree felling element of the construction phase, whereby deer stalking would be interrupted. Due to the large scale of the overall land area within the North Kyle Forest complex it is anticipated that in those areas not directly impacted upon by the Project deer stalking can continue as before. Those undertaking deer stalking within the local FLS land are experienced in working within wind farm development sites and as such no significant effects arising from the operation of the Proposed Development are considered to be likely and are scoped out of further assessment.

Effect of Forest Loss due to Windblow outside the long term forest removal area (Management felling)

- 9.4.14 The area of proposed tree felling outside the long-term forest removal area required to reduce the risk of windblow has been identified for the Proposed Development and the effects of windblow resulting through areas of mature or semi-mature forest have been considered.
- 9.4.15 These areas have been identified by establishing the extent of the long-term forest removal area required for the construction and operation of the Proposed Development and identifying adjacent areas where there is a high risk of windblow as a result of exposure of the retained trees. These trees are generally currently part of a larger forest compartment where there is an element of mutual support given. By felling the trees within the long-term forest removal area, this support will be removed and a 'brown edge' will be created. It is anticipated that 137.9 ha of forest is likely to be affected by management felling for windblow mitigation. This is a reduction of 21.3 ha of management felling required compared to the May 2025 Application. All this projected management felling is within the ownership of FLS. Due to the fact that the trees within Ravenscroft Forest are relatively young and yet to establish the mutual shelter and stability seen when trees are older there is no requirement for management felling in that forest.
- 9.4.16 All management felling will be undertaken only with the approval of both the landowner and Scottish Forestry and this approval will only be granted by Scottish Forestry where the landowner is committed to replanting the same area. As a result



of this legal commitment which can be enforced through the Forestry and Land (Scotland) Act 2018, this potential effect has been scoped out of the assessment. Furthermore, it is understood through ongoing discussions with FLS that the existing Land Management Plan will be varied to address the requirements for management felling attributable to the introduction of infrastructure felling for the Proposed Development.

Sensitivity of Receptors

9.4.17 As there are no published criteria, guidance or methodologies in relation to the appraisal of sensitivity of effects on forestry, the assessment is necessarily based on professional judgement informed by available forestry plans (and supporting information), field work, local management experience and consultation.

9.4.18 Sensitivity has been determined by the criteria set out in **Table 9.3**, below.

Table 9.3: Forestry Receptor Sensitivity Criteria

Degree of Sensitivity	Description
High	<ul style="list-style-type: none"> Highly valued due to crop species and age, e.g. ASNW or NWSS; National conservation designations in place; Particularly rare or distinctive; and Considered susceptible to small changes.
Medium	<ul style="list-style-type: none"> Valued more locally possibly with local designations; and Considered tolerant of moderate levels of change.
Low	<ul style="list-style-type: none"> Generally, more commonplace; No conservation or landscape designations; Considered tolerant of noticeable change; and Undergoing substantial development such that their character is one of change.
Negligible	<ul style="list-style-type: none"> Where the proposed infrastructure does not require tree clearance and / or is present within the woodland area with no adverse impact; Tolerant of major changes, e.g. plantation forest where major structural changes are regular or planned as part of a normal felling cycle; and No designations and considered of low or no ecological or landscape value.

9.4.19 The sensitivity of forestry management to the effects of the operational felling has been determined taking additional account of:

- forest productivity (in terms of, species and crop mixture);
- accessibility in terms of ground conditions;
- current management regime, including objectives of management, and size of management unit; and
- imposition of additional safety constraints in forest areas adjacent to the Proposed Development.

9.4.20 It should be noted that not all aspects included above are required concurrently to define the sensitivity level.

Magnitude



- 9.4.21 Linked to the criteria set out above, the magnitude of the effect is defined as major or moderate based on the area of trees to be felled. The magnitude is considered to be minor or none where trees can be lopped/crowned instead of felled.

The magnitude of change to forestry receptors has been determined with reference to the criteria set out in **Table 9.4** below.

Table 9.4: Magnitude of Change Criteria

Magnitude of Change	Description
Major	<ul style="list-style-type: none"> The loss of any ancient woodland associated with a conservation designation for a site or feature of international, national or regional importance which creates a damaging impact or loss of resource integrity. A noticeable change to the woodland over a wide area or An intensive change over a limited area.
Moderate	<ul style="list-style-type: none"> The loss of any ancient woodland associated with a conservation designation of district importance. Small changes to the woodland over a wide area or Noticeable change over a limited area.
Minor	<ul style="list-style-type: none"> No loss of any ancient woodland. very minor changes to the woodland over a wide area or minor changes over a limited area.
Negligible	<ul style="list-style-type: none"> No loss of any ancient woodland.

Significance

- 9.4.22 The predicted significance of the effect of tree removal can be considered both in terms of the area of the crops removed (magnitude of change) and the sensitivity of those crops. Commercial plantation forestry can usually be replanted to replace the lost resource quite quickly but if designated ancient woodland is affected, though replanting can be implemented, it may take decades for an ecosystem of similar quality and variety to re-establish.
- 9.4.23 There is no particular industry standard to be applied in respect of the impact of woodland removal so the sensitivity and magnitude criteria derived in **Tables 9.3** and **9.4** above are based on professional judgement. The sensitivity and magnitude are combined to determine the significance of the effect of the proposed Development on the forestry resource, as shown in **Table 9.5** below.
- 9.4.24 Major and Moderate effects are considered Significant in the context of the EIA Regulations and require mitigation to resolve. Any combination which results in a significance of Minor or negligible is considered to be *Not Significant* in the context of the EIA Regulations and does not require any mitigation.

Table 9.5: Significance Criteria

Sensitivity	Magnitude of Change			
	Major	Moderate	Minor	Negligible
High	Major	Major	Moderate	Minor / None
Medium	Major	Moderate	Minor	None



Sensitivity	Magnitude of Change			
	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	None	None
Negligible	Minor	None	None	None

Limitations, Difficulties and Uncertainties

- 9.4.25 The assessment has some limitations, primarily related to the availability of historical land-use data and ongoing forest management activity affecting survey accuracy. However, the combination of desk-based research and field surveys has provided a robust basis for evaluating potential effects as at the date of writing

9.5 Baseline

Current Baseline

- 9.5.1 The current baseline reflects two separate ownerships of commercial conifer forestry within the Proposed Development (refer to **Figure 9.2**). The majority is owned by Scottish Ministers and managed by Forestry & Land Scotland (FLS), and the balance is under private ownership. Both these ownership areas are being managed primarily for timber production. At the time of writing, the North Kyle Energy Project was under construction within the wider North Kyle Forest.

North Kyle Forest

- 9.5.2 The North Kyle Forest Estate, as shown within Figure 9.1 under management by FLS, covers approximately 4,000 ha, with the Proposed Development located towards the northwestern end of the forest area. Approximately 858.0 ha of the North Kyle Forest falls within the boundary of the Proposed Development (see **Figure 9.2**). Part of the forest within the Proposed Development boundary has been recently felled as part of the long-term felling plan of the forest owners. Areas of recently felled forestry (Awaiting restocking) within the Site can be seen on **Figure 9.3**.
- 9.5.3 There is a small area of native woodland within the Proposed Development boundary, the location of which is shown on **Figure 9.4**.

Ravenscroft Forest

- 9.5.4 Part of the Proposed Development falls within the Ravenscroft Forest Area which is under private ownership. Approximately 150.1 ha of Ravenscroft Forest is located within the boundary of the Proposed Development (see **Figure 9.2**).

Future Baseline

- 9.5.5 The Site for the Proposed Development extends in total to , 1087 ha inclusive of access road – inside of red line boundary ha and the projected composition of the



forestry crops within that area in 2027 post construction is summarised in **Table 9.5** below, and illustrated on **Figure 9.5**.

The proposed tree clearance works associated with the installation of the project will result in the clearance of a total net area of 99.6 Ha of existing forestry. This includes 87.8 ha within North Kyle Forest and a further 11.8 Ha within Ravenscroft Forest. Within the Afforested gross area detailed within table 9.5 is 18.8 Ha of open land in North Kyle Forest and 3.29 Ha of open ground within Ravenscroft Forest.

9.5.6 A summary of the forest composition post construction is given in **Table 9.6** below

Table 9.6: Projected Baseline Forest Crop Composition within the Site at the start of Construction of the Proposed Development in 2027

Forest	Area within site boundary 2025	Afforested gross area 2027	Windfarm Infrastructure gross area 2027
North Kyle	858.0Ha	751.4	106.6 Ha
Ravenscroft	150.1 Ha	135	15.1 Ha
Total	1008.1 Ha	886.4 Ha	121.7Ha

9.5.7 The Windfarm Infrastructure gross area 2027 is 4.5 ha less than that calculated for the May 2025 Application. This is primarily due to T2 and T13 being moved out of forested areas.

9.6 Embedded Mitigation

Mitigation Through Design (Primary Mitigation)

9.6.1 There is a small area of broadleaf woodland classified within the Native Woodlands of Scotland survey (NWSS) as Upland Mixed Ashwood, where a section of the proposed infrastructure roading passes between turbines T6 and T11 for a distance of c 85 m. Route changes developed during the design period have allowed the road line to avoid all existing trees in this area. Refer to **Revised Chapter 3: Design Evolution and Alternatives** for more details regarding how forestry and other environmental constraints influenced the design of the Proposed Development.

Embedded Secondary Mitigation

9.6.2 The potential effects of the Proposed Development have been assessed in **Section 9.8**, below, taking account of embedded mitigation.

9.6.3 The following mitigation measures will be implemented as part of the Proposed Development and are considered to be embedded mitigation for the purposes of the assessment:

- Minimisation of woodland clearance and specifically any woodland clearance within designated areas,
- Retention of stable woodland edges to reduce windblow risk; and
- Compensatory planting as per the Scottish Government's Control of Woodland Removal Policy (2009) (CoWRP) to address permanent loss of forest resource in appropriate locations.



9.6.4 In addition to the changes made through the design of the Proposed Development to take account of potential effects on forestry, a series of good practice measures will be put in place through a Construction and Environmental Management Plan (CEMP) to minimise the effect of the Proposed Development on forestry. The assessment has been undertaken on the basis that the following measures will be in place:

- Adherence to Forestry Industry Safety Accord FISA guidance during felling and extraction of forestry. This is an industry wide commitment to raise the standard of health and Safety in Forestry
- Adherence to SF & Scottish Environment Protection Agency (SEPA) Guidelines e.g. to ensure protection and enhancement of the water environment during felling and construction.
- Implementation of tree harvesting and extraction methods to ensure minimisation of soil disturbance and compaction during felling and construction; and
- The Applicant will commit to working with the landowners through the construction period to facilitate ongoing forest management where possible within the constraints of safe working practices and the associated CDM working.

Management Felling

9.6.5 The Proposed Development has no mechanism to control felling and replanting/restocking within those areas vulnerable to windblow and out with development footprint. However, the applicant is committed to liaising with landowners to agree that these areas will be felled to mitigate the risk of forest damage through windblow. The felling of these areas would require the agreement of the relevant landowners and would be delivered in line with a felling permission to be applied for by the landowner to Scottish Forestry (SF) on behalf of the Scottish Ministers. It is anticipated that each felling permission would be granted subject to a condition, to ensure that the felled woodland is replanted. In terms of the Forestry and Land Management (Scotland) Act 2018 (“2018 Act”) and associated regulations, in making a decision on any felling application, the Scottish Ministers acting through SF must have regard to their duty under section 2 to promote sustainable forest management. In addition, SF are entitled to impose conditions in relation to the retention of, or increase in, woodland cover. SF normally expect an area which has been clear felled to be restocked and will normally attach what is referred to as a continuing condition to felling permissions to secure the restocking.

9.6.6 Should the landowner not agree to pre-emptively fell the woodland required to create a more windfirm edge (to mitigate the windblow effects) and the trees subsequently suffer from windblow, it is within the control of SF, on behalf of Scottish Ministers, using powers contained in the 2018 Act and associated Felling (Scotland) Regulations 2019 to issue felling and restocking directions. In terms of section 34 of the 2018 Act, if it appears to SF that felling of trees is required to prevent deterioration or further deterioration in the quality of timber comprised in the trees or to improve the growth of other trees or to prevent or reduce harm caused by the presence of the trees, it may serve a felling direction on the owner of the land requiring the felling of the trees. These powers could be exercised to address the



effects of windblow. Felling directions may also be issued subject to conditions addressing the retention of or increase in woodland cover. SF can therefore secure the replanting or restocking of woodland which has been felled.

9.6.7 In addition, and separately, in terms of Section 36 of the 2018 Act, SF may serve a restocking direction where felling is not carried out in accordance with a felling permission, a felling direction, a restocking direction, or a continuing condition on felling permission in relation to land has not been complied with.

9.6.8 Having regard to the duty imposed upon Scottish Ministers to promote sustainable forest management, the powers available to issue felling directions and the practice of imposing conditions on felling licences granted under the 2018 Act, the assessment has been undertaken on the basis that any windblow resulting from the introduction of the windfarm development would require the relevant landowner to replant the same area of forest. This is separate from any commercial imperative the landowner may have. Should the landowner agree to fell these same areas prior to windblow occurring as part of the Proposed Development then this would require the appropriate felling permission to be in place. As noted above, these permissions would normally include a similar restocking condition which would result in no net loss of forestry outside of windfarm footprint. As such, there is deemed to be no loss of forestry from the effect of windblow, and this has been scoped out of detailed assessment.

9.7 Assessment of Potential Effects

9.7.1 Potential effects during construction, operation and decommissioning are considered as detailed below.

Construction Effects

Long-Term / Permanent Loss of Forest Resource

9.7.2 The felling of the Proposed Development construction areas will have an impact on the local forest resource within the sensitive receptors (i.e. North Kyle Forest and Ravenscroft Forest).

The Proposed Development will require the felling of a total of 99.6 ha of commercial conifer forestry, which is predominately Sitka Spruce. This felling is required to facilitate the development footprint including access tracks, cabling and turbine bases with 100 m radius keyholes to facilitate the safe operation of the turbines. These felled areas will remain forestry-free for the life of the Proposed Development, i.e. 40 years, and is therefore considered to be a long-term or permanent loss of forest resource. Of the 99.6 ha required to be felled for



infrastructure, 87.8 ha will be required within the North Kyle Forest with a further 11.83 ha required within the Ravenscroft Forest.

- 9.7.3 The sensitivity of the receptors to loss of forest resource is considered Low in that the forest type is more commonplace, and it is considered tolerant of noticeable change.
- 9.7.4 The magnitude of the impact on the site also takes into consideration the required compensatory planting through embedded mitigation, and is consequently considered to be Moderate, since there is a small change in terms of woodland loss over a wide area.
- 9.7.5 The significance of the effect this is considered to be Minor for loss of forest resource and as such is *Not Significant* in EIA terms.

Felling required for construction compounds and temporary access tracks

- 9.7.6 These areas are expected to be replanted following the completion of the Project's construction phase. While it is anticipated that landowners will seek woodland reinstatement and the Applicant will work towards securing this outcome through voluntary agreements, replanting cannot be guaranteed as landowners must apply for restocking consent should they choose to do so. As such it cannot be considered a committed mitigation measure for the purposes of this assessment. As a result of this legal commitment which can be enforced through the Forestry and Land (Scotland) Act 2018 the impact of the felling of the construction compounds and temporary roading is considered temporary. It is understood through ongoing discussions with FLS that the existing Land Management Plan for the areas within which the Proposed Development falls will be varied to address the requirements for this felling attributable to the construction compounds and temporary roads.
- 9.7.7 The sensitivity of the receptors to the temporary loss of forest in these areas is considered to be Low in that the forest type is more commonplace and it is considered potentially tolerant to noticeable change.
- 9.7.8 The magnitude of the impact on the site takes into consideration the required replanting through embedded mitigation, and as such it is considered Moderate. There would be noticeable change over a limited area.
- 9.7.9 The significance of the effect of felling required for temporary construction areas is considered to be Minor for construction compounds and temporary access tracks and as such *Not significant* in EIA terms

Temporary Effects on Forest Management During Construction

- 9.7.10 As mentioned above 99.6 ha of forestry is projected to be removed for the construction and operation of the Proposed Development. The trees proposed for felling comprise commercial conifer. The commercial conifer species are predominately Sitka Spruce with smaller areas of Lodgepole Pine and Hybrid Larch. This combination of conifer species is typical of this part of Southwest Scotland. Due to the nature of the current forest management practices within both forests where they are primarily being managed for commercial timber production it is



considered the sensitivity of the impact on forest management is Low in that they are considered tolerant to noticeable change. The magnitude of the impact on forest management is considered to be Moderate in that this presents a noticeable change over a limited area. The significance of impact on forest management during construction is Minor and therefore *Not Significant* in EIA terms.

Operational Effects

Effects on forest management during operation

- 9.7.11 Due to the nature of the current forest management practices within both receptor forests where they are primarily being managed for commercial timber production it is considered the sensitivity of the impact on forest management during the operational phase of the wind farm is Low in that in terms of the current and projected management regime it is considered they are tolerant to noticeable change. The magnitude of the impact on forest management during the operational phase of the Proposed Development is considered Minor in that this presents a very minor changes post-construction to the woodland over a wide area. It is therefore considered that the significance of impact on forest management during operation is negligible and therefore *Not Significant in EIA terms*.

Decommissioning Effects

- 9.7.12 There will be no additional impact on the woodland areas during the decommissioning phases as it is envisaged that the proposed infrastructure could be operated and subsequently removed and the ground reinstated without removing further trees from the woodland areas. Furthermore, a Decommissioning and Restoration Plan will be agreed with the EAC prior to the commencement of decommissioning activities which could address any potential new forestry impacts that may arise over the life of the Proposed Development.

9.8 Mitigation

- 9.8.1 As mentioned in **Section 9.7**, trees that will be removed from infrastructure area will be cleared to a wind-firm boundary in the crops adjoining the infrastructure construction areas.
- 9.8.2 As required under the Scottish Government Control of Woodland Removal Policy (CoWRP), any tree crops permanently removed for infrastructure construction will be replanted on a like-for-like area basis (99.6 ha) either within the Site or at a suitable substitute location. The location of that substitute site has yet to be identified and would be subject to detailed agreement with Scottish Forestry and the relevant landowners to include location, design, planting timescale and appropriate post-planting monitoring and maintenance schedules in advance of construction commencing for the Proposed Development.
- 9.8.3 The compensatory planting area will be subject to regular inspection, monitoring and remedial management inputs when required, covering replacing dead trees,



weeding and vermin control, to ensure the initial stocking density of the crops is maintained until the trees are fully established.

9.9 Assessment of Residual Effects

- 9.9.1 The proposed substitute site planting required to satisfy the terms of the CoWRP to compensate for crops lost to infrastructure construction, would ensure that the gross areas of forest crops existing within the Site would effectively be maintained once the proposed mitigation planting work had been completed i.e. there will be no net-loss of forestry resource. Overall, a residual effect of negligible significance is therefore predicted.

9.10 Assessment of Cumulative Effects

- 9.10.1 There are no predicted cumulative effects of tree removal linked to other wind farm projects in the area due to the compensatory planting mitigation which will be implemented in respect of the Proposed Development.

9.11 Summary

- 9.11.1 There will be no net loss of forestry resource as a result of the construction of the Proposed Development. The areas of trees removed for infrastructure construction (extending to 99.6 ha) will be replicated by an off-site compensatory planting scheme in full compliance of the CoWRP. The residual effects are summarised in **Table 9.7**.



Table 9.7: Summary of Residual Effects

Description of Effect	Significance of Potential Effect		Mitigation Measures	Significance of Residual Effect	
	Significance	Beneficial / Adverse		Significance	Beneficial / Adverse
During Construction					
Tree removal for infrastructure felling	Minor (Not Significant)	Adverse	Suitable compensatory planting on a like-for-like basis on a substitute site.	Negligible	Neutral
Effects on forest management during construction	Minor (Not Significant)	Adverse	None required.	N/A	N/A
During Operation					
Effects on forest management during operation	Minor (Not Significant)	Adverse	None required.	N/A	N/A
Cumulative					
No net loss of forestry over the life of the Proposed Development, and no net loss for any of the other wind farms in the surrounding area due to compensatory planting. No cumulative effects.					



9.12 References

- Scottish Government, 2019. Control of Woodland Removal Policy,
<https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal>
- Forest Research, 2023. The UK Forestry Standard,
https://assets.publishing.service.gov.uk/media/651670336a423b0014f4c5c0/Revised_UK_Forestry_Standard_-_effective_October_2024.pdf
- Scottish Government, 2019. Scotland's Forestry Strategy 2019 to 2029.
<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2019/02/scotlands-forestry-strategy-20192029/documents/scotlands-forestry-strategy-2019-2029/scotlands-forestry-strategy-2019-2029/govscot%3Adocument/scotlands-forestry-strategy-2019-2029.pdf>
- Scottish Government, 2019. Policy on control of woodland removal: Implementation Guidance 2019. <https://www.forestry.gov.scot/publications/349-scottish-government-s-policy-on-control-of-woodland-removal-implementation-guidance>
- National planning Framework 4 Policy 6 (forestry, woodland and trees).
<https://www.gov.scot/publications/national-planning-framework-4/pages/3/>
- Forest Industry Safety Accord (FISA) guidance. <https://ukfisa.com/Safety/Safety-Guides>
- The Scottish Government's Ancient Woodland Inventory (last updated 2024)
<https://map.environment.gov.scot/sewebmap/>
- Native Woodland Survey of Scotland (last updated 2024).
<https://map.environment.gov.scot/sewebmap/>

