**Response to Far Ralia woodland creation Ref 23FGS71733 – Nick Kempe**

I appreciate being consulted on the above scheme after commenting directly SAC on the original proposals in March 2022. My comments on those proposals are attached, most remain relevant to the current proposals and I would ask that they are also considered by Scottish Forestry as they help frame the comments I make here.

**Deer and fencing**

The most significant change to the original proposals, which I welcome, is that the proposal to construct a deer fence along the boundary with Wild Land Ltd has been dropped. As the revised application states “sporting activities ceased in 2020 due to the vast reduction in deer numbers caused by neighbouring estate’s deer cull policies”.

The Operational Plan refers to a Deer Management Plan but this was not included in the consultation documents and it is therefore unclear how ABDN and its agents propose to control deer numbers or play their part in future deer culls. Wildland Ltd has shown that where deer have been reduced to under 2 per square kilometre there is widespread natural regeneration of trees and little need for planting. Far Ralia should be required to do the same as a pre-condition for any grant.

The fact that they are proposing to create a new deer fence (2595m) along the boundary with Phonies Estate raises doubts about their commitment to deer control. Replacing the existing fence (I have walked along it) would be a complete waste of money.

That and the stock fence (5265m) being proposed along the Ralia Estate boundary will have significant adverse implications for wild life. The application states that “the deer fence will not be marked with regards to Black Grouse as the Lek is over 2km away”. This pays no regard to the bird carnage caused by deer fencing or the fact that both grouse and capercaillie disperse after breeding. We need that to happen if the populations of both species are to increase.

There are also issues with the stock fencing and the impact this could have on the waders breeding along the Milton Burn, including rare species. A precautionary approach should preclude stock fencing in this area.

It is worth noting that the fencing proposals included in the application appear a consequence of neighbouring landowners failing to control their deer/stock properly. By paying for such fencing under the WGS Scottish Forestry would be enabling neighbouring landowners to continue to use their land in ways that are contrary to the conservation objectives of the National Park.

**The tree planting proposals – impact on nature**

Unfortunately, the maps accompanying the application are generally hard to read and it is difficult to understand exactly what is being proposed. However, what is clear is that the proposal submitted on behalf of ABDN have been designed to maximise the amount of grant aid:

"Open Ground has been minimised due to the presence of so much deep peat and other non-grantaidable ground".

That suggests that the current proposals are being driven by a wish by ABDN to maximise the amount of grant it receives rather than climate or nature conservation interests. Minimising the amount of open ground is not good for nature and coupled with intensive planting will create woodland of a uniform age reminiscent of the plantations of the 1970s and 1980s, but this time with native trees.

The nature conservation value of such woodland is likely to be strictly limited. The potential benefits are further reduced by a majority of the planted trees comprising Scots Pine and birch. Both species are very common in the Cairngorms and would spread naturally given time. While some aspen are included in the proposal, there are no proposals to plant rarer willows etc which might actually help increase biodiversity on the site.

There is already extensive birch regeneration on Meall Dubh, on the western corner of Far Ralia, and with the prevailing south west winds this would extend naturally if deer numbers were kept low creating a far more natural looking forest. Instead, however, of allowing for this in their proposals, ABDN have restricted the “regeneration area” to ground that is already covered in trees. It would be far better for Scottish Forestry to require a much larger regeneration area.

Page 16 allows for sourcing of seeds from other zones (covered on Page 2 of the Forest Commission’s guidance on seeds) which casts doubt on claims by Akre Trees that they will be using locally sourced seeds. Natural regeneration would ensure local provenance.

The application also makes no attempt to assess the impact of this intensive planting on species associated with open moorland and which are recorded on the site, most notably hen harriers and merlin. That is a very strong argument for reducing the amount of land that is planted and retaining open space in the interests of biodiversity.

**Tree planting proposals – the use of vole guards**

The application refers to the use of over 556,500 vole guards. There is no mention of whether these vole guards will be plastic or biodegradable but it is almost inconceivable that this number of tubes could be successfully removed whatever conditions are attached to the grant. One website for 'normal' vole guards gives an average weight per tube of 24g:

[Tubex Vole Guards | Vole & Mice Protection | British Hardwood Tree Nursery](https://www.britishhardwood.co.uk/tubex-vole-guards)

24 x 556,500 = 13,356,000g, or just over 13 tonnes of plastic spread across an area that is supposed to be an environmental restoration project.

In terms of collection of plastic guards, even if someone were to collect say, 300 vole guards a day - and this number becomes far less likely as the trees get larger as access to undergrowth is very labour intensive, that is 1,855 days of labour for one person (556,500/300). Paying that person £100 per day would give a total cost of £185,500!

Scottish Forestry should therefore only provide grant aid for the planting if biodegradable tubes are to be used. It is worth noting from a nature perspective, the main reason why tubes are required is because by planting tens of thousands of trees at the same time, a large new food source is created which leads to an explosion of species such as voles and mountain hares. That would be far less of a problem if planting was restricted and took place over time, as happens with natural regeneration.

**The tree planting proposals – impact on carbon emissions**

According to the maps large parts of the site appear to be covered with peat between 5cm and 50cm deep. While the proposals are consistent with the current Scottish Forestry policy position, that there should be no planting on peat over 50 cms deep, INTENSIVE planting is proposed for all areas with peat less deep than this.

The application states that this will be done by inverted mounding which involves use of diggers crossing areas of peat and will expose mounds of peat (40 x 40) to the atmosphere. The application states this will enable the peaty soils to drain and help trees get established. Actually, as the peat dries out it will rapidly degrade releasing carbon into the atmosphere. Currently research shows that the carbon benefits of new woodland may not offset the release of carbon from disturbed soils for 30-40 years, assuming of course that the trees survive. From a carbon perspective therefore – and ABDN ostensibly bought Far Ralia for carbon off-setting purposes – the WGS application makes no sense. The application fails to address this issue of carbon benefits v carbon releases.

As more evidence about the destructive impact of planting on peat is gathered, it is likely that the current policy position on the depth of peat that can be planted will change. Given that Far Ralia is in the Cairngorms National Park, however, Scottish Forestry could and should give due regard to the policies in the National Park Partnership Plan which promote the importance of peat and natural regeneration of woodland. Given how all peat bogs develop over time, starting on bare ground and then over centuries accumulating to considerable depths, it makes sense to protect ALL peat in the National Park and only to plant trees on ground without peat.

**Future sporting use?**

Page 24 is contradictory. It states the land “has been used extensively for game and little else and should continue as such” implying that sporting use will continue while also suggesting this has now ceased. The wording may be a mistake but should be clarified. Scottish Forestry should not be grant aiding the creation of new woodland which is then used for pheasant and partridge shooting.

**The way forward**

Instead of grant aiding this destructive woodland proposing, Scottish Forestry should be asking ABDN to develop an alternative plan based on natural regeneration and protection of peat as is being pioneered by Wild Land Ltd. As part of that Scottish Forestry could grant aid a much larger natural regeneration area but also pay for some hand-planting, particularly of rarer tree species, which would take far longer to re-colonise Far Ralia through natural regeneration alone.