CHAPTER 12 – FORESTRY

Figures (Volume 3 of this EIA Report)

Figure 12.1: Proposed Felling
Figure 12.2: Proposed Felling and Environmental Constraints

Visualisations (Volume 4 of this EIA Report)

There are no visualisations associated with this Chapter

Appendices (Volume 5 of this EIA Report)

Appendices 12.1.1 to 12.1.127: Woodland Reports
Appendix 12.2: Native Woodland Management Strategy
Appendix 12.3: Compensatory Planting Strategy

12 FORESTRY

12.1 Introduction

12.1.1 This Chapter presents the assessment of the potential effects on forest and woodland areas resulting from the Proposed Development. The assessment is supported by **Appendices 12.1.1 to 12.1.127: Woodland Reports** (in Volume 5 of this EIA Report). The Appendices contain a series of location specific Woodland Reports in relation to forestry and woodland that would be intersected by the Proposed Development. These Woodland Reports detail the current baseline in terms of describing the woodland type (including species, condition, current management), and future management under reference to the Land Management Plans (LMPs) where available. The Woodland Reports contain the detailed assessment of impacts likely to result from the construction and operation of the Proposed Development. Future management proposals have been designed in conjunction with relevant landowners / forest managers to create a resilient and sustainable long-term forest management system.

12.1.2 The assessment has been prepared by Bidwells LLP in line with the UK Forestry Standard (UKFS) guidance[1]. All staff contributing to this Chapter have professional experience in forestry survey and environmental impact assessment (EIA). A table presenting the relevant qualifications and experience of the specialists involved in the preparation of this Chapter is included in **Chapter 5: EIA Process and Methodology**.

12.1.3 Throughout this assessment, areas of ancient, native and broadleaved woodland are referred to as woodland and areas of predominately commercial species are classed as forests.

12.2 Scope of Assessment and Methodology

Scope of Assessment

12.2.1 This Chapter considers the potential significant effects of the Proposed Development on forestry, including cumulative effects with other developments where relevant. This includes an assessment of the sensitivity of the forestry and woodland areas located along the route of the Proposed Development and an assessment of the likely magnitude of the impacts that would arise from the Proposed Development, with particular emphasis on forest and woodland structure and management.

12.2.2 The assessment is based on the description of the Proposed Development that is provided in **Chapter 3: Project Description** and related Appendices.

12.2.3 The assessment is based on the requirement to form, and maintain, an Operational Corridor (OC) along the route for the Proposed Development, while recognising the potential impacts over broader forest management areas as a result of the Proposed Development. This Chapter reports on the assessment of the effects associated with the creation of the OC and proposed management felling associated with potential future windblow and does not address the overall Long Term Forest Plans (LTFPs). Any felling undertaken out with the OC would be solely under the control of the relevant landowner (and not the Applicant). Consequently, the assessment is limited to consideration of the effects of the Proposed Development on the present forest composition and yield, at the time of writing. The relevant landowners and forest managers have been consulted on the felling requirements within the OC and how these may impact the overall LTFPs. Proposals to develop the additional works required to maintain a sustainable long-term resilient holding following the clearance of the OC have been developed alongside the landowners and forest managers to minimise the long-term impact. The Applicant will continue to work with landowners on this matter.

[1] United Kingdom Forestry Standard (UKFS), Forestry Research (2023). Available at: https://www.forestresearch.gov.uk/tools-and-resources/fthr/uk-forestry-standard/

12.2.4 As provided in terms of the Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002[2] and Schedule 4 to the Electricity Act 1989[3], the Applicant has the necessary statutory powers to remove woodland for the purposes of construction and on-going maintenance of new Overhead Lines (OHLs) and / or protection of electrical plant.

Legislation, Policy, and Guidance

12.2.5 Relevant legislation and guidance documents have been reviewed and considered as part of this forestry assessment. This Section considers the relevant aspects of National Planning Framework 4, the Highland-wide Local Development Plan 2012[4], Moray Local Development Plan 2020[5], Aberdeenshire Local Development Plan 2023[6], Planning Advice Notes and other relevant guidance with the policies set out below.

12.2.6 Regard has been given to the following policies of relevance to the forestry assessment presented within this Chapter:

National Policies

- National Planning Framework 4 (NPF4 – adopted February 2023)
- Forestry and Land Management (Scotland) Act 2018
- Climate Change Action Plan (Scotland) 2018
- Scotland's Forestry Strategy (SFS), 2019 - 2029
- Scotland's Third Land Use Strategy (SLUS), 2021-2026
- Scottish Biodiversity Strategy to 2045 – Tackling the Nature Emergency
- Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017
- Control of Woodland Removal Policy (CoWRP), 2009[7]
- Guidance to FCS staff on implementing the Scottish Government's Policy on Control of Woodland Removal, 2019
- UK Forestry Standard, 5th Edition (2023)
- Management of Forestry Waste, 2017

Regional Policies and Local Development Plans

- Highland-wide Local Development Plan (2012)
- Highland Forest and Woodland Strategy, November 2018[8]
- Highland Biodiversity Action Plan (2015)
- Moray Local Development Plan (2020)
- Moray Woodland and Forestry Strategy[9]
- Aberdeenshire Local Development Plan 2023
- Aberdeenshire Forestry and Woodland Strategy 2017[10]

[2] UK Government (2002). Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002. Available at: https://www.legislation.gov.uk/uksi/2002/2665/contents/made
[3] UK Government (1989). Electricity Act 1989. Available at: https://www.legislation.gov.uk/ukpga/1989/29/contents
[4] The Highland Council (2012). Highland-wide Local Development Plan, Available at: https://www.highland.gov.uk/info/178/development_plans/199/highland-wide_local_development_plan
[5] Moray Council (2020). Moray Local Development Plan, Available at: Moray Local Development Plan 2020 - Moray Council
[6] Aberdeenshire Council (2023). Aberdeenshire Local Development Plan 2023. Available at: Aberdeenshire Local Development Plan 2023 - Aberdeenshire Council –
7 Forestry Commission Scotland (2009). Control of Woodland Removal Policy Available at: https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal/viewdocument/285
[8] The Highland Council (2018). Highland Forest and Woodland Strategy, November 2018. Available at: https://www.highland.gov.uk/directory_record/712594/forest_and_woodland_strategy
[9] Moray Council (2020). Moray Woodland and Forestry Strategy. Available at: http://www.moray.gov.uk/moray_standard/page_105190.html
[10] Aberdeenshire Council (2017). Available at: https://www.aberdeenshire.gov.uk/environment/natural-heritage/forestry/

12.2.7 These documents and their relevance to this Chapter are summarised below.

Policy Context

12.2.8 Scotland's forestry and woodland policies are firmly rooted in a commitment to sustainable land use, biodiversity conservation, and climate resilience. At the national level, the Scottish Forestry Strategy (SFS) provides a long-term vision for forestry in Scotland, aiming to expand and enhance the country's woodland resource while delivering multiple public benefits. The strategy prioritises the creation of resilient, well-managed forests that contribute to biodiversity, support a thriving forest economy, and play a central role in addressing the climate and nature crises. It sets out key principles for sustainable forest management and places a strong emphasis on woodland expansion, restoration of degraded habitats, and the role of forestry in carbon sequestration and ecosystem services.

12.2.9 In alignment with the SFS, the intent of National Planning Framework 4 (NPF4)[11] policy is to safeguard, protect, and expand forests, woodlands, and trees. Through Local Development Plans, it encourages the identification and protection of existing woodland and the potential for its enhancement or expansion. This is to avoid habitat fragmentation and to improve ecological connectivity, while also recognising opportunities for creating multifunctional landscapes. The policy underlines the need for sustainable land use and biodiversity conservation across Scotland's planning framework.

12.2.10 The Highland Forest and Woodland Strategy (2018), the Moray Woodland and Forestry Strategy (2020), and the Aberdeenshire Forestry and Woodland Strategy (2017) collectively support this objective through the implementation of comprehensive, regionally tailored policies aimed at preventing habitat fragmentation, enhancing ecological connectivity, and reinforcing nature networks. These strategies recognise the vital role that well-connected and resilient woodland ecosystems play in supporting biodiversity, maintaining ecosystem services, and addressing the challenges posed by climate change.

12.2.11 By prioritising landscape-scale planning and sustainable land use practices, the strategies help ensure that existing woodlands are better protected. They emphasise multi-functional forestry, where economic, ecological, and social benefits are balanced promoting not only timber production and rural development but also habitat restoration, carbon sequestration, and recreational opportunities.

12.2.12 Each strategy provides a regional interpretation of key Scottish Government policies and strategies, including the Scottish Forestry Strategy, translating high-level goals into practical guidance for local implementation. They reflect contemporary priorities in sustainable land management, placing strong emphasis on climate adaptation, biodiversity enhancement, and long-term environmental resilience.

12.2.13 NPF4 requires that developments affecting woodlands (especially native, semi-natural, and ancient woodland) must be carefully assessed and meet strict conditions to proceed. The policy supports sustainable forest management but sets a strong presumption against development that would result in the loss of ancient woodlands or veteran trees, unless exceptional circumstances are demonstrated. The ability of woodlands to deliver nature-positive places, and their role in possible mitigation of climate change, whilst protecting and restoring our environment are an important factor in shaping regulatory mechanisms. The policy framework makes clear that:

(i) Development proposals will not be supported where they result in the loss of ancient woodlands, ancient or veteran trees, or where they adversely impact their ecological condition.

(ii) Adverse impacts on native woodlands, hedgerows, or trees of high biodiversity value will not be supported.

(iii) Proposals that fragment or sever woodland habitats will only be supported where effective mitigation measures are identified and implemented in line with the mitigation hierarchy.

[11] Scottish Government (2024). National Planning Framework, Available at: https://www.gov.scot/publications/national-planning-framework-4/pages/2/

12.2.14 In addition, paragraph (c) of the policy confirms that woodland removal will only be permitted where the proposal delivers significant, clearly defined public benefits, consistent with national policy. Where woodland removal is unavoidable, compensatory planting is expected to be secured.

12.2.15 Finally, paragraph (d) clarifies that for proposals involving sites with existing woodland, or land identified in regional forestry strategies as suitable for new woodland creation, development will only be supported where woodland enhancement, improvement, and new planting are fully integrated into the scheme design. This ensures that development outcomes align with the long-term vision for sustainable forestry and land use in Scotland.

12.2.16 The control of forestry felling is usually administered under the Forestry and Land Management (Scotland) Act 2018. Woodland removal, defined in the Scottish Government's CoWRP as "*the permanent removal of woodland for the purposes of conversion to another land use*" falls within the scope of Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. However, when woodland removal is associated with a development proposal (e.g., under the Town and Country Planning Act), the EIA requirements fall under planning regulations, and not forestry-specific EIA regulations.

12.2.17 The Scottish Government's CoWRP and accompanying implementation guidance provide details and background on the latest guidance, policy, principles, criteria and process for managing forestry removal on development sites.

Consultation

12.2.18 Full details of the consultation process and responses are included in **Chapter 6: Scope and Consultation** and associated appendices, with specific responses which have informed the forestry assessment detailed in **Table 12.1: Consultation Reponses** below.

Table 12.1: Consultation Responses

Organisation	Type of Consultation	Response	How response has been considered
Aberdeenshire Council	Scoping	Secondary effects (ecology, ornithology, hydrology, landscape and visual, recreation) are to be considered within the relevant chapters in the EIAR (Environmental Impact Assessment Report). In terms of being able to make a comprehensive assessment of the impact of the proposal on forestry it would be useful if the relevant sections of those chapters were clearly cross referenced from the forestry Chapter.	The secondary effects have been addressed in **Chapter 8: Ecology**, **Chapter 7: Landscape and Visual**, **Chapter 9: Ornithology**, **Chapter 10: Water and Geological Environment**, and **Chapter 14: Recreation and Tourism** and are cross-referenced where relevant in this Chapter.
Highland Council	Scoping	The Applicant will need to provide an ES which includes a baseline survey of all the woodlands, trees, and plants (including fungi, lichens, and bryophytes) present on the site to determine the presence of any rare or threatened species. This could be a specific Forestry Chapter by a professional forester which identifies the location, area, type, and condition of all productive woodland on and around the route along with a Terrestrial Ecology chapter which identifies the location, area, type, and condition of all native woodland. The Applicant will also need to provide a breakdown of the impact of the proposals on woodland by type	A baseline survey of habitats and species is included in **Appendix 8.1:UK Habitat and Protected Species Survey Report.** All ancient woodlands will be assessed to identify their remnant characteristics and condition status. This includes evaluating features such as tree species composition, ground flora, structural diversity, and the presence of deadwood or veteran trees, as these are key indicators of woodland health and ecological integrity. As part of this process, a survey of the ground flora will be undertaken where feasible, as this provides critical

Organisation	Type of Consultation	Response	How response has been considered
		(productive, native or both), as well as making clear the likely impact on woodland listed in the AWI under the various categories and provide confirmation of the impact on native woodland listed in the NWSS (Native Woodland Survey of Scotland). The Applicant should design the layout to minimise the impact on woodland as much as possible, especially native broadleaf woodland and woodland listed on the AWI (Ancient Woodland Inventory) as ASNO (Ancient Semi-Natural Origin). The ES should include Tree Constraints Plans and Tree Protection Plans to BS 5837:2012 to show how retained trees/ woodland would be safeguarded from construction activity as well as a tree/ woodland removal drawing which shows the extent of woodland that would need to be removed to accommodate new development. The Applicant will also need to provide a Landscape Plan and Landscape Maintenance Plan which shows how trees to be removed are to be replaced with on-site planting and to show how the visual amenity of the local landscape is to be enriched. Where woodland is proposed to be removed, compliance with the Scottish Government's Control of Woodland Removal policy must be demonstrated. Where there are any proposals for woodland removal, compensatory planting of an area of new woodland, of a scale and type of woodland equivalent to that which is to be removed is a clear expectation. With this application, any compensatory planting is likely to be off-site.	insights into the ecological condition and character of the woodland. The presence and composition of ground flora are considered reliable indicators of ancient woodland remnants and are central to understanding its ecological status. Detailed, standalone surveys of bryophytes (mosses and liverworts) and fungi are not required because they are not explicitly prioritised in the condition assessment methodology. While bryophytes and fungi are important components of woodland biodiversity, their distribution is often highly localised and influenced by specific microhabitats or environmental factors. As a result, additional surveys of these groups are unlikely to provide substantial added value to the overall condition assessment or influence management recommendations. This Chapter provides a specific assessment on forestry interests, including commercial forestry plantations, areas of native woodland and areas of Ancient Woodland. Landscape mitigation and enhancement measures have been included where the Applicant has control over the land, i.e. within the OC and includes rationalisation of the existing transmission network where necessary. Landscaped forestry proposals have been provided in sensitive areas including fringe planting and consideration of hedgerows. See **Chapter 7: Landscape and Visual.** Woodland has been a key factor in the alignment identification stage to minimise impacts on forestry loss. The Woodland Reports identify the construction impact on each individual woodland and any mitigation operations. The proposal includes a significant buffer and operational zone to ensure retained woodlands are outwith any construction zones, negating the need for Tree Constraints Plans or Tree Protection Plans. An assessment has been carried out to identify potential effects on forestry and native woodland (including AWI) throughout the route. The supporting Appendices to this

Organisation	Type of Consultation	Response	How response has been considered
			Chapter also confirm compensatory measures where woodland loss is anticipated. All woodland areas to be removed have been assessed and similar woodlands will be planted off-site to ensure no loss of woodland. Any designated woodlands identified for removal will be replanted with additional biodiversity improvements to compensate for loss of environmental value. See **Appendix 12.3: Compensatory Planting Strategy**
Scottish Forestry	Scoping	Scottish Forestry agree that the Scoping Report describes impacts on all types of woodland from Plantation to Native Ancient Woodlands recorded on the Ancient Woodland Inventory. Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Where woodland removal is justified, the Compensatory Planting (CP) area must exceed the area of woodland removed to compensate for the loss of environmental value. Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest stages, rather than removing the woodland completely. Scottish Forestry are concerned about an extract from the Scoping Report as it indicates the Forestry assessment will only focus on commercial forestry. Scottish Forestry strongly encourage the developer to ensure the forestry assessment and chapter describe the impacts on all woodland types. Woodlands that are described in Chapter 7 of the Scoping Report, Ecology and Nature Conservation, must be included in the Forestry Chapter to ensure the policies set out above have been applied to all types of woodland cover. Detailed information on any compensatory planting proposals should also be provided. Any additional felling which is not part of the planning application will require permission.	All woodland types have been assessed within the Woodland Reports provided in **Appendices 12.1.1 to 12.1.127** (in Volume 5 of this EIA Report). Any designated woodland identified for removal has been assessed to clarify the condition of the woodland characteristics. If identified for removal, mitigation methods including reduction of the OC or crown reduction have been put forward. Opportunities will be taken to reduce the OC felling where possible and seek to retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and construction activities. See **Appendices 12.1.1 to 12.1.127: Woodland Reports** for full details. All woodland areas to be removed have been assessed and similar woodlands will be planted off-site to ensure no loss of woodland. Any designated woodlands identified for removal will be replanted with additional biodiversity improvements to compensate for loss of environmental value. See **Appendix 12.3: Compensatory Planting Strategy**.

Organisation	Type of Consultation	Response	How response has been considered
Scottish Environment Protection Agency (SEPA)	Scoping	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. The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber.	All forestry operations associated with the Proposed Development will be conducted in full compliance with the UK Forestry Standard (UKFS) Forest and Water Guidelines, ensuring best practices are adhered to for the protection of watercourses and riparian environments. Additionally, all activities will align with the SEPA guidance on the Management of Forestry Waste to prevent environmental harm and ensure waste is handled appropriately. Comprehensive Woodland Reports have been prepared for each woodland area affected by the Development (see **Appendices 12.1.1 to 12.1.127**). These reports provide detailed assessments of the felling requirements, considering environmental sensitivities and sustainable forestry practices. They also outline specific mitigation measures designed to minimise ecological impacts, protect biodiversity, and ensure the preservation of valuable habitats.

Extent of the Study Area and OC

12.2.19 The study area for this assessment initially focussed on a 100 metre (m) area either side of the centre line of the Proposed OHL Alignment and ancillary infrastructure, where relevant, prior to the identification of an OC. Subsequent to this, the study area was expanded to include areas of woodland impacted outside of the OC that could potentially suffer windblow as a result of felling within the OC. Windblow refers to the uprooting or toppling of trees, which can occur due to the removal of surrounding trees that may have provided shelter. These additional impacted areas were considered in the assessment to account for potential knock-on effects from the felling activities, ensuring a more comprehensive evaluation of the broader impact on forest and woodland areas.

12.2.20 The OC is defined based on two different factors. The first factor in which the OC is determined is with reference to the distance at which a tree could fall and cause damage to the OHL, resulting in a supply outage. As a result, the OC width would be based on the safety distance required to allow for a mature tree falling towards the OHL at the mid-point on an OHL span between two towers, taking account of topography and tree height at maturity. The second factor that is considered is the maximum distance that the OHL conductors can blow out from the tower under a 1 in 50-year return period wind condition, plus the required electrical clearance distance. This value is then rounded to the nearest 5 m. This is to ensure that the OHL conductors do not come in contact or come close enough to any object that could result in an electrical clearance infringement. The conductor blowout distance is span specific so varies between each tower and must be considered on an individual span basis.

12.2.21 The typical OC required within areas of commercial conifer forestry for a 400 kV OHL is 90 m (i.e. 45 m either side of the centre line). Where the OC passes through areas of broadleaved woodland, it is proposed that the extent of woodland removal is likely to be reduced due to the lower height of the tree species present. The proposed OC for the Proposed Development through areas of broadleaved woodland has been reduced to 70 m (i.e. 35 m either side of the centre line of the OHL). This has been based on the likely height of the woodland at maturity. In native broadleaved areas of high sensitivity (i.e. Ancient Woodland Inventory (AWI) / Special Area of Conservation (SAC), it is proposed that trees will be crown reduced or selectively felled to manage potential conflicts with the OHL and minimise impact on the woodland structure. Where any woodland removal within the OC is proposed to be reduced from the 45 m either side of the centre line, a site-specific assessment must be carried out to confirm that the conductor blowout does not exceed the proposed OC width. If the conductor blowout exceeds the proposed OC, then the width of the OC must be increased to meet the requirements of the blowout assessment as a minimum. This will ensure compliance with ESQCR requirements and that the required safety clearances are maintained.

12.2.22 By definition, the OC is deemed to include any tree with the potential to become a "Red Zone" tree as defined within the Forest Industry Safety Accord (FISA), Guidance note 804[12]. This refers to any tree with the potential to fall into the vicinity zone of the OHL conductors or directly onto the conductors causing damage or failure. Within the areas identified for crown reduction / retention **(see Appendices 12.1 to 12.1.127),** this is adjusted to allow for vegetation management to occur to maintain the vicinity zone of the OHL conductors rather than whole tree clearance of the Red Zone. Therefore, in these areas' trees can grow freely vertically or horizontally as long as the 5 m vicinity zone is not, and cannot, be breached by tree fall or branches, as to prevent an OHL safety issue. Should trees encroach near the 5 m safe electrical clearance zone of the OHL conductors, then there would be a requirement for maintenance and the possible cutting back or crown reduction of some of the trees/branches.

12.2.23 Access tracks required for the Proposed Development will necessitate a working corridor extending 10 m on either side of the access track centre line, resulting in a total working width of 20 m. This corridor will accommodate essential construction activities, including track formation, drainage installation, and the movement of construction vehicles and personnel.

12.2.24 The forestry assessment has been limited to the woodland removal required to create the proposed OC for the OHL and required access tracks, as set out in **Chapter 3: Project Description**. It is acknowledged that the creation of the OC would result in wider potential indirect effects on the surrounding woodland areas. These areas would be subject to potential increased risk of damage (windblow). As a result, the assessment work includes a series of Woodland Reports (see **Appendices 12.1.1 to 12.1.127**), in respect of the forests and woodlands affected by the Proposed Development. The Woodland Reports demonstrate how the Proposed Development would be incorporated within ongoing forest management activities. They also identify further areas of felling to establish and leave a windfirm edge for the remaining forestry or woodland; (categorised as an indirect effect). Any felling undertaken outwith the OC would be solely under the control of the relevant landowner (and not the Applicant) (see **Paragraph 1.2.3**).

12.2.25 It should be noted that of the forest and woodlands affected by the Proposed Development, one hundred and eleven of these are private forests or woodlands, two are within the ownership of The Crown Estate and nine are within the ownership of the Scottish Ministers and are managed by Forestry and Land Scotland.

[12] Forestry Industry Safety Accord (FISA). Safety Guide 804 Electricity at Work: Forestry, Available at: https://ukfisa.com/Safety/Safety-Guides/fisa-804

Determining Baseline

Desk Study

12.2.26 Searches of the Land Register of Scotland[13] of the Proposed Development provided the property boundary information of each landholding. A desk-based appraisal of Ordnance Survey (OS) mapping, aerial photography and review of web-based data provided by Scottish Forestry[14] identified the existing forest and woodland cover within a study area, defined as 100 m either side of the Proposed OHL Alignment and areas of forest and woodland impacted outside of the OC that could potentially suffer windblow as a result of felling within the OC and access track / ancillary infrastructure. This was supplemented by consultation with landowners and / or forest managers and review of existing forest data (provided by the landowners) on woodland type (species / age / class) and the existing woodland management regime, including woodland restructuring and LMP / LTFP information.

Field Survey

12.2.27 Forest walkover and mapping surveys were undertaken during the period September 2024 to August 2025, to confirm the extent of the forest or woodland areas affected by the Proposed Development and further assess the current woodland characteristics. Photographic records were taken to provide visual samples of the woodland types and are included in **Appendices 12.1.1 to 12.1.127**.

12.2.28 The forest walkovers included the visual assessment of tree health, vigour, ground conditions and existing forest or woodland stability. Observations were also made of potential forest or woodland windfirm boundaries. The forest walkover surveys included consideration of ancillary infrastructure, and the Limits of Deviation (LoD) as set out in **Chapter 3: Project Description**.

12.2.29 All ancient woodlands were assessed to identify their remnant characteristics and condition status, in line with the requirements of an ancient woodland condition survey as identified by the Woodland Trust[15]. This includes evaluating features such as tree species composition, ground flora, structural diversity, and the presence of deadwood or veteran trees, as these are key indicators of woodland health and ecological integrity.

Methodology for the Assessment of Impacts

12.2.30 There are currently no published criteria, guidance, or methodologies for the assessment of effects on forestry. The impact assessment methodology is detailed within **Chapter 5: EIA Process and Methodology**, which is based upon the requirements of the 2017 EIA Regulations[16].

12.2.31 The assessment is based on best practices, the policy framework and professional judgement, with reference to:

- the sensitivity of the different types of woodland present in the study area, taking account of the degree and rate of change in the woodland, both in the recent past and that anticipated in the near future, and therefore the susceptibility / vulnerability of the woodland to change; the quality of the woodland and the extent to which it is rare or distinctive, and the value attributed to the woodland through designations;
- magnitude of change and extent of woodland removal;
- duration and reversibility - timescale of effect (days / weeks / months / years) until recovery. Permanent effects are described as such, and likelihood of recovery is detailed where appropriate; and
- adverse / beneficial - if the effect will be beneficial or detrimental to the feature.

[13] Registers of Scotland (2025). Available at: https://scotlis.ros.gov.uk/
[14] Scottish Forestry Map Viewer. Available at: https://scottishforestry.maps.arcgis.com/apps/webappviewer/index.html?id=0d6125cfe892439ab0e5d0b74d9acc18 – accessed 02/04/2025
[15] Woodland trust (2018). Ancient Woodland restoration: Survey and assessment of ancient woodland sites. Online, available at: https://www.woodlandtrust.org.uk/publications/2019/02/ancient-woodland-restoration-survey-and-assessment/
[16] Scottish Government (2017). The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. Available at: https://www.legislation.gov.uk/ssi/2017/101/introduction/made

12.2.32 The effect on woodland is normally considered to be of an adverse nature (i.e. tree felling); however indirect beneficial effects in some areas may arise where the introduction of the Proposed Development allows for the removal of ecologically habitat-poor conifer plantation. This may be followed by natural regeneration or planting of more diverse woodland tree mix or introduction of native woodland species, and the development of more open ground than that which existed originally. While there may be an ecological benefit from the removal of conifer plantation forest, there is a presumption against all forest removal which is supported by the Scottish Government's policy on Control of Woodland Removal[17] and the National Planning Framework 4 (NPF4), policy 6. As such, for the purposes of this assessment tree removal is to be considered as having an adverse effect. Further arboricultural works, i.e. crown reduction or limb removal to achieve the necessary safety clearance, removes the necessity for tree removal, thereby reducing the adverse effect on the woodland habitat. Native Woodland Management Strategies have been drawn up for each local authority area to set out the methodology and process that will be followed to limit the removal of ancient and native woodland, and these are included in **Appendix 12.3: Compensatory Planting Strategy**.

Criteria for Assessing Sensitivity / Importance of Receptors

12.2.33 Four categories of sensitivity / importance of a forest or woodland are defined in **Table 12.2**.

Table 12.2: Sensitivity Criteria

Category	Description
High	• Highly valued, subject of national designation e.g. Ancient Woodland Category 1a and 2a. • Particularly rare or distinctive in a national context; or • Considered susceptible to small changes.
Medium	• Valued more locally. • Rare or distinctive in a regional context; and/or • Are tolerant of moderate levels of change.
Low	• Generally, more commonplace, and/or not designated. • Considered potentially tolerant of noticeable change; or • Undergoing substantial development such that their character is one of change.
Negligible	• Already fundamentally changed (e.g. second rotation commercial conifer plantation). • Considered tolerant of noticeable change; or • Having undergone substantial development such that their character is one of change.

12.2.34 Given the dynamic nature of productive forests, which are subject to restructuring, the environmental sensitivity of the forest as a commercial asset and land use is low. There are areas of Ancient Woodland present within the vicinity of the Proposed Development, and these are considered in this assessment to be of high sensitivity. The areas of native and broadleaved woodland are considered in this assessment to be of medium sensitivity. The assessment of effects on ancient and native woodland in ecological terms are addressed in **Chapter 8: Ecology** of the EIA Report.

Criteria for Assessing Magnitude of Change

12.2.35 Criteria for assessing the magnitude of change to a forest or woodland is defined in **Table 12.3.**

[17] Scottish Government's Policy on Control of Woodland Removal: implementation guidance. (2019). Available at: https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal/viewdocument/285

Table 12.3: Magnitude of Change Criteria

Category	Description
High	A noticeable change to the forest or woodland over a wide area or an intensive change over a limited area.
Medium	Small changes to the forest and woodland over a wide area or noticeable change over a limited area.
Low	Very small changes to the forest or woodland over a wide area or small changes over a limited area.
Negligible / None	No discernible change to the forest or woodland.

Significance Criteria

12.2.36 The sensitivity of the woodland (**Table 12.2**) and magnitude of change criteria (**Table 12.3**) are then used to inform a professional judgement on the likely significance of the effect. **Table 12.4** provides a framework for reaching a judgement as to the significance of predicted effects.

Table 12.4: Matrix for Determining the Significance of Effects

		Sensitivity of Receptor/Receiving Environment to Change/Effect			
		High	Medium	Low	Negligible
Magnitude of Change / Effect	High	Major	Major	Moderate	Negligible
	Medium	Major	Moderate	Minor	Negligible
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

12.2.37 Major and moderate effects are considered to be significant within the context of the 2017 EIA Regulations.

12.2.38 A summary of the woodland receptors relevant to the woodland types and whether these have been 'scoped-in' to the assessment are given in **Table 12.5**, together with the justification for inclusion or exclusion. **Appendices 12.1 to 12.1.127** provide details of the named forestry / woodland sites.

Table 12.5: Summary of Woodland Receptors

Receptor	Justification
Plantation conifer forest	• Tolerant to the proposed changes and having no environmental designation. Considered as part of the assessment of effects.
Ancient woodland	• Ancient woodland is an important biodiversity resource. It has no legislative protection but in terms of planning policy protection it benefits from non-statutory designation. • Considered locally tolerant to medium levels of change. This assessment is based on the regional sensitivity. Within this assessment the sensitivity is considered to be high. Considered as part of the assessment of effects.

Receptor	Justification
Native and broadleaved woodland	• Non-designated native and broadleaved woodland is noted to have biodiversity and amenity value and has planning policy protection. • Considered locally tolerant to medium levels of change. This assessment is based on the regional sensitivity. It is recognised there may be some localised areas considered to have increased sensitivity. Within this assessment the sensitivity is considered to be medium. Considered as part of the assessment of effects.

Issues Scoped Out

12.2.39 Secondary effects resulting from forestry activities, including effects on habitats and species, ornithology, hydrology and landscape and visual effects, would be considered within their respective chapters of this EIA Report and have therefore not been included within this Chapter.

Limitations and Assumptions

12.2.40 Forest information has been provided by the landowners and forest / land managers of each landholding and cross checking has only been carried out where observations suggested that the immediate conditions varied from the estate forestry records.

12.3 Baseline Conditions

12.3.1 The baseline characterisation work carried out identified 86 landowners with forest or woodland potentially affected by the Proposed Development. A Woodland Report has been prepared for each of the affected forest or woodland properties (127 reports in total), which are included in **Appendices 12.1.1 to 12.1.127 - Woodland Reports**. Each of these sites were visited and existing data, sourced from the forest owners and their agents, were reviewed, and confirmed against the woodland site surveys.

12.3.2 The total areas in hectares (ha) of forestry and woodland habitats recorded within the OC during the site surveys include:

- Commercial Forestry (376.16 ha);
- Native Broadleaved Woodland (87.99 ha);
- Native Broadleaved Woodland (ancient woodland 1a and 2a) (3.61 ha); and
- Broadleaved Woodland (4.53 ha).

12.3.3 NatureScot's Ancient Woodland Inventory sets out three main categories of ancient woodland, all of which are of value for their biodiversity and cultural value by virtue of their antiquity:

- Ancient Woodland (1a or 2a) - Interpreted as semi-natural woodland from maps of 1750 (1a) or 1860 (2a) and continuously wooded to the present day. If planted with non-native species during the 20th century, they are referred to as Plantations on Ancient Woodland Sites (PAWS);
- Long Established of Plantation Origin (LEPO) (1b or 2b) - Interpreted as plantation from maps of 1750 (1b) or 1860 (2b) and continuously wooded since. Many of these sites have developed semi-natural characteristics, especially the oldest ones, which may be as rich as Ancient Woodland; and
- Other woodlands on 'Roy' woodland sites (3) - Shown as unwooded on the 1st edition maps but as woodland on the Roy maps. Such sites have at most, had only a short break in continuity of woodland cover and may still retain features of Ancient Woodland.

12.3.4 Of the native broadleaved woodland areas identified, **16.04 ha** of these areas are recorded on the Scottish Government's Ancient Woodland Inventory (AWI), as shown within **Figures 12.1.3, 12.1.5, 12.1.6, 12.1.7, 12.1.14, 12.1.15, 12.1.21, 12.1.24, 12.1.26, 12.1.33, 12.1.35, 12.1.36, 12.1.38, 12.1.43, 12.1.49, 12.1.51, 12.1.81, 12.1.90, 12.1.95, 12.1.96, 12.1.100, 12.1.105, 12.1.107 and 12.1.126**. Of this 16.04 ha, **3.60 ha** is classed as Ancient Woodland (1a or 2a) and **12.44 ha** as Long Established of Plantation Origin (LEPO) (2b). All of the identified LEPO woodland is classified as 2b. The broadleaved woodland identified included **1.56 ha** of LEPO (2b) woodland.

Kellas Alternative Alignment

12.3.5 The baseline characterisation work carried out identified three landowners with forest or woodland potentially affected by the Kellas Alternative Alignment. A Woodland Report has been prepared for each of the affected forest or woodland properties (three reports in total), which are included in **Appendices 12.1.68, 12.1.69 and 12.1.70**. Each of these sites were visited and existing data, sourced from the forest owners and their agents, were reviewed, and confirmed against the woodland site surveys.

12.3.6 The total areas of woodland habitats recorded within the OC during the site surveys include:

- Commercial Forestry (11.84 ha); and
- Native Broadleaved Woodland (2.41 ha).

12.3.7 The native woodland area within Parcels 20238 and 4204 are recorded within the Buinach and Glenlatterach Site of Special Scientific Interest (SSSI)[18]. The woodland is of national importance for its range of native woodland habitats. Birch-sessile oak woodland is particularly well represented. The southern and central section of the valley of the Leanoch Burn is dominated by this woodland type.

Future Baseline

12.3.8 In the event that the Proposed Development is not progressed (i.e., under the "do nothing" scenario), it has been assumed that coniferous plantation areas will continue to be managed principally in-line with commercial objectives and woodland restructuring, including their felling and replanting with similar species as set out in the current Forest and Management Plans. It is assumed that the Ancient and native woodland areas would be managed as long-term retention areas. It is not considered likely that there will be a net reduction in the area of forest as a result of this scenario overall, although there will clearly be local changes. On this basis, the current baseline has been used for the purposes of this assessment, and no further consideration will be given to future baseline scenarios.

12.4 Assessment of Likely Significance of Effects

Embedded Mitigation

12.4.1 The embedded mitigation is a combination of decisions taken during the design process to avoid or minimise the potential for likely significant effects, and the implementation of standard practice mitigation measures that are well-established and effective.

Iterative Design Process

12.4.2 The route optioneering for the Proposed Development has taken into consideration effects on forestry and woodland, and such effects to be avoided or minimised where possible. This has continued through the EIA process, with survey data informing the siting of infrastructure and access routes to minimise further potential effects on forestry and woodland, where practicable. This process is detailed in **Chapter 4: The Routeing Process and Alternatives**.

[18] NatureScot (2011). Available at: https://sitelink.nature.scot/site/270

Good Practice

12.4.3 There will be a contractual management requirement for the Principal Contractor to fully implement a comprehensive and site-specific Construction Environmental Management Plan (CEMP). This document will detail how the Principal Contractor will manage all works in accordance with all commitments and mitigation detailed in the EIA Report, the Applicant's General Environmental Management Plans (GEMPs) and Species Protection Plans (SPPs), statutory consents and authorisations, and industry good practice and guidance, including pollution prevention guidance.

12.4.4 In the event that the Applicant engages a separate Forestry Contractor to undertake the forestry works, there will be a contractual management requirement for the Forestry Contractor to develop and fully implement a Forestry Environmental Management Plan (FEMP). This document will detail how the Forestry Contractor will manage all forestry works in accordance with all commitments and mitigation detailed in the EIA Report, the Applicant's General Environmental Management Plans (GEMPs) and Species Protection Plans (SPPs), statutory consents and authorisations, and industry good practice and guidance, including pollution prevention guidance.

12.4.5 Good practice measures with respect to felling requirements will be incorporated into environmental management controls, including:

- adherence to Forestry Commission (Scottish Forestry) Forest and Water Guidelines[19] e.g., to ensure protection and enhancement of the water environment;
- management of forestry waste in accordance with Scottish Environment Protection Agency (SEPA) regulations[20] to ensure all excess waste resulting from forestry operations is correctly disposed of; and
- implementation of tree harvesting and extraction methods to ensure minimisation of soil disturbance and compaction.

Potential Effects

12.4.6 This section considers the potential impacts and associated effect significance of the Construction and Operation of the Proposed Development based on the activities described in **Chapter 3: Project Description**.

12.4.7 The introduction of OHLs into forestry and woodland can give rise to a combination of short-term and long-term effects during both construction and operation. The following interrelated effects can arise from the introduction of OHLs within forest and woodland areas associated principally with the requirement for tree felling and vegetation management.

- direct construction and operational effects: loss of areas of forest through woodland removal to create the OHL OC and access tracks, in the context of the regional forest resource for both commercial forestry, ancient woodland and native woodlands;
- indirect construction effects: increased windblow and secondary felling agreed with landowners;
- indirect operational effects: effects on forest management systems;
- indirect operational effects: restrictions on forest access; and
- cumulative effects: combined loss of woodland from direct and indirect (secondary) felling.

12.4.8 The assessment is structured around the consideration of these effects.

12.4.9 In total, approximately 96 km of the route for the Proposed Development was assessed as being within forest or woodland and associated open ground, where tree clearance would be required to form an OC.

[19] Confederation of Forest Industries (UK) Ltd. Guidance documents. Available at: https://www.confor.org.uk/resources/forestry-water-scotland/guidance-documents/ - accessed 02/04/2025
[20] SEPA (2017) *Management of Forestry Waste*. Available at: https://www.sepa.org.uk/media/28957/forestry_waste_guidance_note.pdf

Predicted Construction Impacts

12.4.10 The direct and gross loss of woodland from construction of the Proposed Development is set out for each woodland type and Council Area in **Tables 12.6 and 12.7. Table 12.6** records the woodland types to be felled (where these are commercial, native, broadleaved and ancient) and breaks these down into the relevant local authority areas, the Highland Council, Moray Council and Aberdeenshire Council (going from west to east). **Table 12.7** shows the woodland removal in terms of the type of felling operations involved (OC felling, access track felling and crown reduction).

Table 12.6: Woodland Removal by Council Area

	Woodland Type Area (ha)				
Council Area	Commercial	Native	Broadleaved	Ancient (1a & 2a)	Total Area (ha)
Highland	154.45	60.28	0.87	2.16	217.76
Moray	176.13	12	0.00	1.45	189.58
Aberdeenshire	45.58	14.47	3.66	0.00	63.71
TOTAL AREA (ha)	**376.16**	**86.75**	**4.53**	**3.61**	**471.05**

Table 12.7 Construction Phase Woodland Removal

Development Felling Requirements			
Woodland Type	Operation	Designation	Area (ha)
Commercial	OC Felling	AWI 1a & 2a	2.24
		LEPO 2b	128.45
		None	235.41
	Access Track Felling	AWI 1a & 2a	0.00
		LEPO 2b	4.32
		None	4.96
	Crown Reduction	None	0.78
TOTAL			**376.16**
Native	OC Felling	AWI 1a & 2a	1.09
		LEPO 2b	11.76
		None	68.40
	Access Track Felling	AWI 1a & 2a	0.00
		LEPO 2b	0.69
		None	2.68
	Crown Reduction	AWI 1a & 2a	2.51
		SSSI	0.00
		None	3.23
TOTAL			**90.36**
Broadleaved	OC Felling	AWI 1a & 2a	0.00
		LEPO 2b	1.56
		None	2.94
TOTAL			**4.53**
GRAND TOTAL			**471.05**

12.4.11 The total direct and gross loss of forestry and woodland for construction of the Proposed Development equates to 471.05 ha; this includes 376.16 ha of commercial forestry removal, 90.36 ha of ancient and native woodland removal and 4.53 ha of broadleaved woodland. The detailed breakdown is provided in **Appendices 12.1.1 to 12.1.127** (the woodland reports).

Commercial Forestry

12.4.12 As shown in **Table 12.6**, the direct loss of commercial forestry as a result of the Proposed Development is primarily because of the requirement to form an OC, with some felling required to form access tracks.

12.4.13 The sensitivity of commercial forestry within the study area is low. The combined and direct loss of 376.16 ha of commercial forestry across all areas is assessed as a low magnitude of change, in the context of a noticeable change over a limited area, equating to a 0.06% impact of woodland removal within the Highland Council regional resource forest area of 232,500 ha, 0.42% impact of woodland removal within the Moray Council regional resource forest area of 51,648 ha and 0.05% impact of woodland removal within the Aberdeenshire Council regional resource forest area of 91,225 ha. This effect is assessed as **Minor Adverse** and **Not Significant.**

Native Woodland

12.4.14 The combined and direct loss of native woodland (mixed native broad-leaved woodland), including recently planted woodland, due to construction of the Proposed Development would be 90.36 ha. The sensitivity of native woodland is considered within this assessment as medium. Within the Highland Council region, the recorded area of native woodland is 130,000 ha, therefore the impact area (60.28 ha) would represent a maximum of 0.05% of the regional resource. Within the Moray Council region, the recorded area of native woodland is 10,628 ha, therefore the impact area (12 ha) would represent a maximum of 0.1% of the regional resource. The total area of native woodland within the Aberdeenshire Council boundary is 37,855 ha, therefore the impact area (14.47 ha) would represent a maximum of 0.04% of the regional resource. The magnitude of change is considered medium and as such the effect is assessed as **Moderate Adverse** and **Significant**.

Ancient Woodland

12.4.15 The combined and direct loss of ancient woodland (1a and 2a), due to construction of the Proposed Development would be 3.61 ha.

12.4.16 The sensitivity of ancient woodland is considered within this assessment as high. The magnitude of change is considered high and as such the effect is assessed as **Major Adverse** and **Significant.**

12.4.17 Within the Highland Council region, the recorded area of ancient and native woodland is 130,000 ha, therefore the impact area (2.16 ha) would represent a maximum of 0.001% of the regional resource. Within the Moray Council region, the recorded area of ancient and native woodland is 10,628 ha, therefore the impact area (1.45 ha) would represent a maximum of 0.009% of the regional resource. There are no areas of AWI impacted within the Aberdeenshire Council boundary.

12.4.18 The assessment of the impact of the clearance of ancient semi natural woodland in biodiversity terms is addressed within **Chapter 8: Ecology**.

Broadleaved Woodland

12.4.19 The combined and direct loss of broadleaved woodland, due to construction of the Proposed Development would be 4.53 ha.

12.4.20 The sensitivity of broadleaved woodland is considered within this assessment as medium. The magnitude of change is considered medium and as such the effect is assessed as **Moderate Adverse** and **Significant**.

12.4.21 A breakdown of the ancient, native, and broadleaved woodland habitat types impacted by construction of the Proposed Development are shown in **Table 12.8**.

Table 12.8: Woodland Impacted by Construction by Habitat Classification

Habitat Type	Area (ha)
Ancient woodland (1a and 2a)	3.61
LEPO 2b	14.01
Native woodland	74.31
Broadleaved woodland	4.53
Total	**96.46**

Construction Effects – Windblow

12.4.22 The tree felling required through areas of mature commercial forestry to create the OC would result in an indirect effect of increasing potentially unstable forest edges where retained trees stand immediately adjacent to the OC. These areas, known within the forest industry as 'brown edges,' have relatively unstable trees within them which previously depended upon the now felled neighbouring trees for support. The risk of windblow is that these brown edge trees would be damaged and blown over due to the lack of shelter.

12.4.23 The area required to be felled additionally as a consequence of the creation of the OC is called management felling and has been scoped in this assessment. This assessment identifies as an indirect impact the additional area (management felling) of 684.72 ha of woodland which would be at increased risk of windblow. This includes 683.40 ha of commercial forestry and 1.32 ha native woodland (mixed native broad-leaved woodland). The sensitivity of commercial forestry within the study area is low. The magnitude of impact would be low, and therefore this additional area is assessed as **Minor Adverse and Not Significant**. The sensitivity of native woodland within the study area is medium. The magnitude of impact is considered medium and as such the effect is assessed as **Moderate Adverse and Significant.** Notwithstanding this assessment, the Applicant has produced Woodland Reports included in **Appendices 12.1.1 to 12.1.127**, which recommend proposals to landowners to remove this risk by identifying additional areas of felling out to the nearest 'windfirm' edge (known as a 'green edge'), where the trees have developed next to open ground. The extent of additional (secondary) 'management felling' required to achieve this reduction in windblow risk would be 684.72 ha. The sensitivity of the forest for removal of trees out with the OC is considered low, in that the forest is deemed tolerant to this level of change and that such change could be expected to occur during normal forest management practices. The additional felling requirement introduced by the Proposed Development would only be to potentially bring felling activity forward and as such can be considered to be a temporary (albeit long-term) effect, with replanting likely to be required as a condition of any statutory felling license granted. The approach to mitigation in relation to this additional felling to protect against future windblow is discussed in greater detail in **Section 12.5** of this Chapter.

Predicted Operational Impacts

Woodland Removal

12.4.24 The direct operational effects on forests and woodland associated with the Proposed Development would be limited to periodic vegetation management to maintain the OC. Within the OC, following the construction of the Proposed Development, there would be an ongoing need to manage the growth of vegetation to facilitate access for maintenance of the OHL and to maintain the required tree clearance zones for the safe and resilient operation of the OHL. Within the areas identified for crown reduction, it is anticipated that a further 6.13 ha of crown reduction would be required within 4 years following the construction of the OHL. The OC, after woodland removal, is deemed to be of negligible sensitivity and the impact of vegetation management is considered to represent a low magnitude of change. Overall, the adverse effect during operation is assessed as **Negligible** and **Not Significant.**

12.4.25 In addition, there is the potential for a medium to long-term beneficial effect through the opportunity to manage lower growing vegetation to provide biodiversity enhancement in the OC. The development of a species diverse area of lower growing shrub species would provide valuable habitat for local fauna and flora.

Effects on Forest Management Systems

12.4.26 The introduction of a new OHL through areas of managed forest would require a review by each landowner of the existing management system. Larger commercial forest areas have a LTFP which identifies the operations intended for the ongoing management of the forest over a 20-year period. This LTFP also provides the forest owner with consents from Scottish Forestry, as the forest authority, to undertake felling and replanting of the forest over a 10-year period. The impact of the Proposed Development is therefore only in terms of individual LTFPs having to be revised to address the construction of the OHL and the associated tree clearance works on the future management of the site. In the absence of mitigation, the requirement for forest owners to revisit their LTFP to incorporate the existence of the Proposed Development could be onerous. The sensitivity of the management system to revision is considered to be low; however, the magnitude of change required in terms of restructuring the LTFP to incorporate felling for the OC and potentially additional felling to avoid wind throw could be, locally or for the individual landowner, of high magnitude and thus the effect is **Moderate Adverse** and **Significant.**

Restrictions on Forest Access

12.4.27 At the time of tree harvesting the forest industry has a range of operations, some of which can be restricted by the presence of an OHL. Live electrical OHLs provide several risks in terms of tree felling and extraction of the timber to the roadside near the OHL. Loading and haulage of the timber off-site can also be restricted within proximity of the OHL.

12.4.28 The sensitivity of the forestry and woodlands to this impact is considered to be low and the magnitude of change is defined as none, due to the working area being removed by approximately 45 m from the Proposed OHL Alignment (in commercial forestry) Alignment due to the presence of the OC. Assuming that all proposed felling works would incorporate standard health and safety management measures (e.g. the forest industry safety accord) as set out in **Section 12.5** of this Chapter, the effect is assessed as **Negligible** and **not significant.**

Kellas Alternative Alignment

12.4.29 The direct and gross loss of woodland from construction of the Kellas Alternative Alignment is set out for each woodland type and the relevant Council Area of Moray Council in **Tables 12.9** and **12.10**.

Table 12.9 Woodland removal by Council Area for Kellas Alternative Alignment (Moray Council area)

	Woodland Type				
Council Area	Commercial	Native	Broadleaved	Ancient (1a & 2a)	TOTAL
Moray	11.84	2.41	0.00	0.00	14.25
TOTAL	**11.84**	**2.41**	**0.00**	**0.00**	**14.25**

Table 12.10 Construction Phase Woodland Removal

Development Felling Requirements			
Woodland Type	Operation	Designation	Area (ha)
Commercial	OC Felling	AWI 1a & 2a	0.00
		LEPO 2b	0.00
		n/a	11.84
	Access Track Felling	AWI 1a & 2a	0.00
		LEPO 2b	0.00

Development Felling Requirements			
Woodland Type	Operation	Designation	Area (ha)
		n/a	0.00
	Crown Reduction	n/a	0.00
TOTAL			11.84
Native	OC Felling	AWI 1a & 2a	0.00
		LEPO 2b	0.00
		n/a	1.17
	Access Track Felling	AWI 1a & 2a	0.00
		LEPO 2b	0.00
		n/a	0.00
	Crown Reduction	AWI 1a & 2a	0.00
		SSSI	1.24
		n/a	0.00
TOTAL			2.41
GRAND TOTAL			14.25

12.4.30 The total direct and gross loss of forestry and woodland for construction of the section along the Kellas Alternative Alignment equates to 14.25 ha; this includes 11.84 ha of commercial forestry removal and 2.41 ha of native woodland removal. The detailed breakdown is provided in **Appendices 12.1.68, 12.1.69 and 12.1.70.**

Commercial Forestry

12.4.31 As shown in **Table 12.9**, the direct loss of commercial forestry as a result of the section along the Kellas Alternative Alignment is primarily because of the requirement to form an OC.

12.4.32 The sensitivity of commercial forestry within the study area is low. The combined and direct loss of 11.84 ha of commercial forestry across all areas is assessed as a low magnitude of change, in the context of a noticeable change over a limited area, this effect is assessed as **Negligible** and **Not Significant.**

Native Woodland

12.4.33 The combined and direct loss of native woodland (mixed native broad-leaved woodland), due to construction of the section along the Kellas Alternative Alignment would be 2.41 ha. The sensitivity of native woodland is considered within this assessment as medium. The magnitude of change is considered medium and as such the effect is assessed as **Moderate Adverse** and **Significant**.

Construction Effects – Windblow

12.4.34 The tree felling required through areas of mature commercial forest to create the OC would result in an indirect effect of increasing potentially unstable forest edges where retained trees stand immediately adjacent to the OC. These areas, known within the forest industry as 'brown edges,' have relatively unstable trees within them which previously depended upon the now felled neighbouring trees for support. The risk of windblow is that these brown edge trees would be damaged and blown over due to the lack of shelter.

12.4.35 For the Kellas Alternative Alignment, this assessment identifies an additional area of 19.09 ha of woodland which would be at increased risk of windblow. This is entirely commercial forest. The sensitivity of commercial forest within the study area is low. The magnitude of impact would be low, and therefore this additional area is assessed as **Negligible**.

12.4.36 Notwithstanding this assessment, the Applicant has produced Woodland Reports included in **Appendices 12.1.68, 12.1.69 and 12.1.70**, which recommend proposals to landowners to remove this risk by identifying additional areas of felling out to the nearest 'windfirm' edge (known as a 'green edge'), where the trees have developed next to open ground. The extent of additional (secondary) 'management felling' required to achieve this reduction in windblow risk would be 19.09 ha. The sensitivity of the forest for removal of trees out with the OC is considered low, in that the forest is deemed tolerant to this level of change and that such change could be expected to occur during normal forest management practices. The additional felling requirement introduced by the Proposed Development would only be to potentially bring felling activity forward and as such can be considered to be a temporary (albeit long-term) effect, with replanting likely to be required as a condition of any statutory felling license granted. The approach to mitigation in relation to this additional felling to protect against future windblow is discussed in greater detail in **Section 12.5** of this Chapter.

Predicted Operational Impacts

Woodland Removal

12.4.37 The direct operational effects on forests and woodland associated with the section along the Kellas Alternative Alignment would be limited to periodic vegetation management to maintain the OC. Within the OC, following the construction of the section along the Kellas Alternative Alignment, there would be an ongoing need to manage the growth of vegetation to facilitate access for maintenance of the OHL and to maintain the required tree clearance zones for the safe and resilient operation of the OHL. Within the areas identified for crown reduction, it is anticipated that a further 1.24 ha of crown reduction would be required within 4 years following the construction of the OHL. The OC, after woodland removal, is deemed to be of negligible sensitivity and the impact of vegetation management is considered to represent a low magnitude of change. Overall, the adverse effect during operation is assessed as **Negligible** and **Not Significant.**

12.4.38 In addition, there is the potential for a medium to long-term beneficial effect through the opportunity to manage lower growing vegetation to provide biodiversity enhancement in the OC. The development of a species diverse area of lower growing shrub species would provide valuable habitat for local fauna and flora.

Effects on Forest Management Systems

12.4.39 The introduction of a new OHL through areas of managed forest would require a review by each landowner of the existing management system. Larger commercial forest areas have a LTFP which identifies the operations intended for the ongoing management of the forest over a 20-year period. This LTFP also provides the forest owner with consents from Scottish Forestry, as the forest authority, to undertake felling and replanting of the forest over a 10-year period. The impact of the Proposed Development is therefore only in terms of individual LTFPs having to be revised to address the construction of the OHL and the associated tree clearance works on the future management of the site. In the absence of mitigation, the requirement for forest owners to revisit their LTFP to incorporate the existence of the Proposed Development could be onerous. The sensitivity of the management system to revision is considered to be low; however, the magnitude of change required in terms of restructuring the LTFP to incorporate felling for the OC and potentially additional felling to avoid wind throw could be, locally or for the individual landowner, of high magnitude and thus the effect is **Moderate Adverse** and **Significant.**

Restrictions on Forest Access

12.4.40 At the time of tree harvesting the forest industry has a range of operations, some of which can be restricted by the presence of an OHL. Live electrical OHLs provide several risks in terms of tree felling and extraction of the timber to the roadside near the OHL. Loading and haulage of the timber off-site can also be restricted within proximity of the OHL.

The sensitivity of the forestry and woodlands to this impact is considered to be low and the magnitude of change is defined as none, due to the working area being removed by approximately 45 m from the Proposed OHL Alignment (in commercial forestry) due to the presence of the OC. Assuming that all proposed felling works would incorporate standard health and safety management measures (e.g. the forest industry safety accord) as set out in **Section 12.4** of this Chapter, the effect is assessed as **Negligible** and **Not Significant.**

12.5 Additional Mitigation

Construction Phase

Loss of Woodland

12.5.1 The areas of ancient and native woodland impacted by the Proposed Development (3.09 ha) could potentially be further reduced through micrositing within the LoD where a combination of factors (e.g. topography, tower height, tree species and height) may reduce the area of ancient native woodland defined as being within the OC. **Appendix 12.2 Native Woodland Management Strategy** includes measures to reduce impacts on ancient and native woodland and veteran trees. For example, the extent of tree clearance may be reduced where it can be demonstrated through further detailed survey that the trees can be safely overflown by the OHL conductors, or that the trees can be accommodated within closer proximity to the Proposed Development with either no work being required, or a degree of crown reduction only. There may also be opportunities to further retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and allows for safe construction activity. See Appendix 12.2: Native Woodland Management Strategy.

12.5.2 The mitigation measures outlined in the Woodland Reports (**Appendices 12.1.1-12.1.127: Woodland Reports**) will guide woodland management activities during construction. These reports detail all necessary felling for the Proposed Development and access tracks, ensuring alignment with environmental commitments. windblow

12.5.3 The Woodland Reports also include seeking to agree a forest landscape design following good practice as defined by Forestry Commission (Scottish Forestry) Guidance (2014)[21]. The delivery of the felling identified in the Woodland Reports has been developed in conjunction with the landowners / forest managers to deliver felling and restocking out with the Proposed Development. The Applicant has agreed the use of the Woodland Reports to confirm the extent of woodland removal required. This proposed felling will be further reviewed with the landowners to link this with their existing LTFP / LMP which, once amended, will be required to adhere to the UKFS as part of the approval process with Scottish Forestry. This approval is required prior to any felling being undertaken. This method of addressing felling has been successfully used on a number of recent large-scale development projects and has delivered forest design to the satisfaction of Scottish Forestry as the statutory authority.

Construction Effects – Windblow

12.5.4 The Woodland Reports (**Appendices 12.1.1 to 12.1.127**), identify mitigation measures to reduce the risk of future windblow by outlining felling strategies to create stable forest edges outside the Proposed Development within each woodland property.

[21] Forestry Commission (2014) *Design techniques for forest management planning.* Available at: https://www.forestry.gov.scot/publications/106-design-techniques-for-forest-management-planning/viewdocument/106

Operational Phase

Effects on Forest Management Systems

12.5.5 To mitigate the predicted likely significant effect on forest management systems for individual landowners, the Applicant has developed the Woodland Reports (**Appendices 12.1.1 to 12.1.127**) in conjunction with the relevant landowners and forest managers.

Permanent Loss of Woodland

12.5.6 Given that the Proposed Development would result in the permanent loss of woodland, the Applicant is committed to making arrangements to plant off-site the equivalent area of woodland as Compensatory Planting, meeting the Scottish Government's Control of Woodland Removal Policy (CoWRP)[22] objective of no net loss of woodland (see **Appendices 12.1.1 to 12.1.127**), and **Appendix 12.3: Compensatory Planting Strategy**. This will be delivered off-site within the relevant local authority area.

Summary of Additional Mitigation

12.5.7 **Table 12.11** below summaries the additional mitigation identified in relation to forestry.

Table 12.11: Summary of Additional Mitigation Measures

Reference	Description
FO1	The **Appendix 12.2: Native Woodland Management Strategy** identifies mitigation measures to reduce impacts on native and ancient woodland and veteran trees.
FO2	The Woodland Reports (**Appendices 12.1.1** to **12.1.127**) identify mitigation measures to: • address the likely significant effects predicted for forest land-use management during construction and operation. • reduce the risk of future windblow by outlining felling strategies to create stable forest edges outside the Proposed Development.
FO3	**Appendix 12.3**: **Compensatory Planting Strategy** has been created to ensure forest and woodland lost through felling is replaced. This will be delivered off-site within the relevant local authority area.

Kellas Alternative Alignment

12.5.8 There will be no changes to the additional mitigation measures identified for the Proposed Development. All measures will remain in place as originally proposed, ensuring that the environmental and ecological safeguards associated with this alignment continue to be fully addressed and implemented as intended.

12.6 Residual Effects

12.6.1 This section considers the potential residual effects and associated effect significance of the construction and operation of the Proposed Development, following the implementation of the mitigation measures proposed in **Section 12.5** of this Chapter.

[22] Forestry Commission Scotland. (2009). Available at: https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal/viewdocument/285

Construction Phase

12.6.2 Whilst opportunities have been identified to reduce the predicted removal of 86.75 ha of native woodland, 3.61 ha of ancient woodland, and 4.53 ha of broadleaved woodland (Table 12.9), the extent of these reductions is subject to final micro-siting and a detailed review of wiring operations by the Principal Contractor in consultation with an arboriculturist. Following the implementation of mitigation measures, including the reduction of the OC and compensatory planting, the residual effect on native and broadleaved woodland is assessed as **Minor Adverse** and **not significant**. The residual effect on ancient woodland remains **Major Adverse** and **Significant**, reflecting its high ecological value and irreplaceable nature, which cannot be fully mitigated.

12.6.3 The Woodland Reports (**Appendices 12.1.1 to 12.1.127**) have identified good practice measures to further mitigate construction-related effects, including windblow management, selective felling, and crown reduction techniques. However, at this stage the Applicant is limited to committing to working with landowners to seek to agree felling through the Woodland Reports, which would in-turn lead to changes to the LTFP on land outside of the Applicant's control at this stage. While the Applicant is committed to working collaboratively with landowners to mitigate potential construction effects, the ability to fully implement these changes is dependent on the cooperation of external parties. The Applicant will continue to engage in discussions with relevant landowners to explore the feasibility of adjusting the LTFP and agreeing to the necessary felling measures.

12.6.4 The Applicant is committed to implementing off-site Compensatory Planting to replace the equivalent area of woodland lost due to the Proposed Development. See Appendix 12.3: Compensatory Planting Strategy. This measure aligns with the Scottish Government's Control of Woodland Removal Policy objective of achieving no net loss of woodland. The compensatory planting will be strategically planned to enhance ecological connectivity, support biodiversity conservation, and contribute to wider forest landscape integration. Further details on the location, species composition, and long-term management of the compensatory planting will be provided in consultation with Scottish Forestry and other relevant stakeholders.

12.6.5 The National Planning Framework 4 (NPF4) sets out Scotland's long-term planning strategy, emphasising climate resilience, biodiversity enhancement, and sustainable land use. Under NPF4 Policy 6 (Forestry, Woodland, and Trees), there is a strong presumption against the removal of ancient and native woodland. Where such woodland loss is unavoidable, NPF4 states that more woodland must be planted that is removed to deliver a net positive effect on biodiversity, carbon sequestration, and habitat connectivity.

12.6.6 Given that the Proposed Development requires felling of native and ancient woodland, a robust replanting strategy is necessary to ensure compliance with NPF4. In line with the policy, the Applicant's Compensatory Planting Plan will exceed the area of woodland removed, ensuring that the project results in a net environmental gain.

12.6.7 Some areas classified as ancient woodland within commercial forests have been heavily impacted by past commercial forestry activities. These operations have significantly altered the original woodland structure and composition, resulting in the loss of key ancient woodland characteristics. Consequently, no remnant features remain that would typically define these areas as ancient or native woodland, raising questions about the practical ecological significance of their removal.

12.6.8 The Applicant will engage with NatureScot to review the classification and ecological value of these areas, considering the absence of ancient woodland characteristics.

12.6.9 Following the implementation of the identified mitigation measures, including the compensatory planting and the measures outlined in the Woodland Reports, the residual effects of the Proposed Development on woodland and forest resources are expected to be minimal. The Applicant's Compensatory Planting Plan will exceed the area of woodland removed, ensuring that the project results in a net environmental gain. in alignment with Scottish Government's Control of Woodland Removal Policy. See Appendix 12.3: Compensatory Planting Strategy. These planting efforts will also enhance ecological connectivity and support broader biodiversity conservation within the region.

12.6.10 Although the construction works may have some initial effects, the Applicant's ongoing engagement with landowners and collaboration on the LTFP will help minimise long-term impacts. The successful implementation of these measures, contingent on external cooperation, will ensure that any potential negative effects are addressed and mitigated to an acceptable level.

Operational Phase

12.6.11 Current and future forest land-use management is likely to be affected by the introduction of the OHL and associated felling requirements. This is likely to require forest managers to amend current objectives, plans and techniques for the relevant forest, in particular, the incorporation of felling requirements into their long-term felling and landscape design plans. Taking account of the proposed mitigation in the Woodland Reports, the residual effect on forest management is assessed as Minor Adverse and Not Significant.

12.6.12 There would be no significant operational effects pre-mitigation on woodland removal or forestry operations access and consequently, no significant residual operational effects are predicted to occur.

12.7 Assessment of Cumulative Effects

12.7.1 The following assessment has been undertaken in line with the methodology in **Chapter 5: EIA Process and Methodology**, **Section 5.5 Cumulative Effects**. There will be a two-tiered approach to the cumulative assessment. The effects of the Proposed Development will be assessed against *intra* developments which are developments required to the connect to the Proposed Development and *inter* developments which will include other SSEN Transmission projects that will not connect to the Proposed Development and third-party developments.

In-combination Effects: Stage 1 – Associated SSEN Transmission Network upgrades

12.7.2 The cumulative projects shortlist was agreed with The Highland, Moray, and Aberdeenshire Councils (**Chapter 5 EIA Process and Methodology, Section 5.5 Cumulative Effects**). This has been reviewed in respect to forestry and woodland and the developments listed in **Tables 12.12 and 12.13**, have been assessed for cumulative effects.

Table 12.12: SSEN Transmission Project Cumulative Schemes

ID	Development	Local Authority Area	Cumulative Effect
01	Fanellan Substation	The Highland Council	No cumulative effects
02	Greens 400 kV Substation	Aberdeenshire Council	Cumulative effects through potential loss of native woodland
03	Netherton Hub	Aberdeenshire Council	No cumulative effects

In-combination Effects: Stage 2 – Other Developments

Table 12.13: Cumulative Projects out with SSEN Transmission

ID	Development	Local Authority Area	Approx. Distance from Proposed Development (km)	Cumulative Effect
CD01	Beauly BESS	The Highland Council	0.6	Cumulative effects through potential loss of native woodland
CD02	Kilmorack Substation	The Highland Council	0.9	No cumulative effects
CD03	Caulternich Farm Energy Storage Project	The Highland Council	0.9	No cumulative effects

ID	Development	Local Authority Area	Approx. Distance from Proposed Development (km)	Cumulative Effect
CD04	Beauly Substation	The Highland Council	0.9	Cumulative effects through potential loss of native woodland
CD05	Cairn Duhie Wind Farm Redesign	The Highland Council	1.1	No cumulative effects
CD06	Aigas Substation	The Highland Council	1.7	Cumulative effects through potential loss of native woodland
CD07	Ourack Wind Farm	The Highland Council	6.7	No cumulative effects
CD08	Tom Nan Clach Wind Farm Extension	The Highland Council	9	No cumulative effects
CD09	Kellas Drum Wind Farm	Moray Council	0	No cumulative effects
CD10	Berry Burn Wind Farm	Moray Council	0	No cumulative effects
CD11	Gibston Farm BESS	Moray Council	0	No cumulative effects
CD12	Teindland Wind Farm	Moray Council	0	No cumulative effects
CD13	Blackmuir Quarry	Moray Council	0.3	No cumulative effects
CD14	Blackhills Wind Farm	Moray Council	0.4	No cumulative effects
CD15	Corshellach Energy Storage	Moray Council	0.5	No cumulative effects
CD16	Drum Farm Energy Storage	Moray Council	0.6	No cumulative effects
CD17	Cairdshill Quarry	Moray Council	0.6	No cumulative effects
CD18	Keith Battery Storage	Moray Council	0.7	No cumulative effects
CD19	Blackhillock Battery Storage	Moray Council	0.8	No cumulative effects
CD20	Elchies (Rothes III) Wind Farm Grid Connection works	Moray Council	0.9	Cumulative effects through potential loss of commercial forestry
CD21	Marchfield Quarry	Moray Council	2.2	No cumulative effects
CD22	Cairds Hill Wind Farm	Moray Council	2.3	Cumulative effects through potential loss of commercial forestry
CD23	Aultmore Wind Farm Redesign	Moray Council	5.3	No cumulative effects
CD24	Greenvolt Onshore Works	Aberdeenshire Council	2.6	Cumulative effects through potential loss of native woodland

12.7.3 Given the Scottish Government's policy on Woodland Removal, in particular NPF4 Policies 6(b) and 6(c), it can be assumed that there would be no material residual loss of woodland associated with these projects as the developers could be expected to be required to undertake compensatory planting for any areas of felling. As such, the cumulative effect is assessed as **Negligible** and **Not Significant.**

12.8 Summary and Conclusions

12.8.1 **Table 12.14: Summary of Predicted Impacts and Residual Effects** provides a summary of the impacts and significance of effects on sensitive receptors from the Proposed Development.

Table 12.14: Summary of Predicted Impacts and Residual Effects

Receptor	Likely Significant Effect	Effect Significance (Pre-Mitigation)	Additional Mitigation	Residual Effect
Woodland Removal (commercial conifer forest) during construction	Direct effect on commercial conifer forest.	Minor Adverse and Not significant based on the area of woodland removal.	The Applicant would implement a suite of standard good practice working methods to ensure that all construction activity (including woodland removal) avoids significant effects on ecological and hydrological receptors. Equivalent area of woodland removed to be planted off-site as per Scottish Government's CoWRP.	**Minor Adverse** and therefore **not significant**.
Woodland removal (Ancient Woodland) during construction	Direct effect on Ancient Woodland.	Major Adverse effect (significant).	The Applicant would reduce the OC felling where possible and seek to retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and construction activities. Equivalent area of woodland removed to be planted off-site as per Scottish Government's CoWRP.	**Major Adverse** and **significant**.
Woodland removal (native Woodland) during construction	Direct effect on native Woodland.	Moderate Adverse effect (significant).	The Applicant would reduce the OC felling where possible and seek to retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and construction activities. Equivalent area of woodland removed to be planted off-site as per Scottish Government's CoWRP.	**Minor Adverse and therefore not significant**.
Woodland removal (Broadleaved Woodland) during construction	Direct effect on Broadleaved Woodland.	Moderate Adverse effect (significant).	The Applicant would reduce the OC felling where possible and seek to retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and construction activities. Equivalent area of woodland removed to be planted off-site as per Scottish Government's CoWRP.	**Minor Adverse** and therefore **not significant**.
Predicted loss of forest due to windblow during construction	Predicted indirect effect on commercial conifer forest based on risk of windblow following construction phase felling.	Minor Adverse and Not significant based on the area of woodland removal.	No mitigation possible within the scope of the Proposed Development. However, mitigation is possible with the co-operation of the landowners. The Applicant has produced Woodland Reports for each forest affected, which will recommend actions to reduce the risk of future wind throw by felling to stable forest edges (outside of the OC).	**Minor Adverse** and therefore **not significant**.

Receptor	Likely Significant Effect	Effect Significance (Pre-Mitigation)	Additional Mitigation	Residual Effect
Woodland removal (operation)	Limited to periodic vegetation management to maintain the OC.	Negligible and not significant	No mitigation is required.	**Negligible** and therefore, **not significant**
Forest management	Indirect effect on woodland management through requirement to incorporate the Proposed OHL Alignment into LTFP.	Moderate Adverse and significant.	The Applicant has produced Woodland Reports for each forest ownership to inform proposed revisions to the relevant LTFP and facilitate agreement with the landowners.	**Minor Adverse** and therefore **not significant**.
Forest Access	Direct effect on access for felling during the operational phase.	Negligible and not significant based on the set back and use of standard safety measures.	No mitigation is required.	**Negligible** and therefore, **not significant.**
Cumulative	No significant cumulative effects predicted.		No mitigation is required	**Negligible** and therefore, **not significant**

12.8.2 This Chapter reports upon the significance of the predicted residual effects from the construction and operation of the Proposed Development on forest and woodland areas. The assessment is supported by **Appendices 12.1 to 12.1.127** (in Volume 5 of this EIA Report). The Appendices contain a series of location specific Woodland Reports in relation to forestry and woodland that would be intersected by the Proposed Development. These Woodland Reports detail the current baseline in terms of describing the woodland type (including species, condition, current management), and future management under reference to the LMPs where available. The Woodland Reports contain the detailed assessment of impacts likely to result from the construction and operation of the Proposed Development.

12.8.3 The Proposed Development is predicted to result in the direct loss of 376.16 ha of commercial forestry, 3.61 ha of ancient woodland, 86.75 ha of native woodland and 4.53 ha of broadleaved woodland, due to the requirement to create an OC for the construction and safe operation of the OHL, including the creation of access tracks.

12.8.4 The Kellas Alternative Alignment is predicted to result in the loss of 11.84 ha of commercial forestry and 2.41 ha of native woodland due to the requirement to create an OC for the construction and safe operation of the OHL, including the creation of access tracks.

12.8.5 The assessment concluded that the removal of 3.61 ha of ancient woodland, would result in a Major and significant adverse effect, despite potential opportunities to reduce the amount of felling, subject to further detailed design.

12.8.6 The removal of 86.75 ha of native woodland and 4.53 ha of broadleaved woodland, would result in a minor and not significant adverse effect, despite potential opportunities to reduce the amount of felling, subject to further detailed design.

12.8.7 No significant effects were predicted for the removal of commercial forestry.

12.8.8 The Applicant is committed to making arrangements to plant off-site the equivalent area of woodland as Compensatory Planting, meeting the Scottish Government's Control of Woodland Removal Policy (CoWRP) objective of no net loss of woodland. In line with National Planning Framework 4 (NPF4) Policy 6, which requires that more woodland be planted than is removed when native or ancient woodland is lost, the Applicant will go beyond a like-for-like replacement. See **Appendix 12.3: Compensatory Planting Strategy**. The Compensatory Planting Plan will exceed the area of woodland removed, ensuring a net positive effect on biodiversity, carbon sequestration, and ecological connectivity. Furthermore, it is acknowledged that the creation of the OC would result in wider potential indirect effects on the surrounding woodland areas. These areas would be subject to potential increased risk of damage (windblow). As a result, the Applicant has produced a series of Woodland Reports (see **Appendices 12.1.1 to 12.1.127**) to incorporate the Proposed Development within ongoing forest management activities. The Woodland Reports identify further areas of felling to leave a windfirm edge (categorised as an indirect secondary impact). Any felling undertaken out with the OC would be solely under the control of the relevant landowner (and not the Applicant).

12.8.9 No significant effects on forest operations access were identified.

12.8.10 Additional good practice measures are identified for implementation on land out with the OC, for example additional felling to deliver a more natural landscaped and wind firm edge. These measures can only be undertaken with the agreement of the affected landowner. It is the intention of the Applicant to encourage the landowners to follow this good practice in terms of redesign of their current Long-Term Forest Plans which in-turn would aim to follow UKFS for the implementation of the works required.