



**NEWCASTLETON
COMMUNITY COUNCIL**

Buccleuch House,
4 South Hermitage Street, Newcastleton, Scottish Borders, TD9 0QR

Ted Downs
EJD Forestry
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14-8-2023

Dear Ted,

Ref Flatt Farm-Liddel Water Forestation

Thank you for your update ref proposed revisions, the CC reviewed them with residents and the wider community at our public meeting on Sept 12th. In our collective view there is not significant change, going forward it would be helpful to indicate the degree and place of any change so this is clear. Members of the public and residents provided additional concerns: Where practical I detail our feedback against your comments below highlighted in grey:

- 1. We were made aware of the speed of water flow on the area of land in the south west corner the site, at the open day and agreed to remove this area from the proposal which is what we've done.*

Changes to the plan is not readily apparent. Sitka requires use of heavy machinery damaging the eco structure. This area also features powerlines giving future management challenges and is very structured in its shape with potential to stand out more than necessary from the valley floor. The community do not consider this best use of the land at this site given that it has high propensity to flood – see SEPA web site.

A desktop constraints analysis did not reveal this - maps are readily available on the SEPA web site, and the community is concerned that EJD did not fully investigate the impacts of flooding before a design was proposed. When SEPA respond to your request please share their feedback with us.

and talking to community members on site we learned of the instances of flooding in the last few years. This is of continuing concern to residents who experience significant flooding when this occurs. They made suggestions to install a French drain to overcome this diverting water away from their property which has not been acknowledged, can you please provide the alternative proposal so that the community council can be satisfied this issue is being addressed.

This shows the benefit of community consultation and I hope that it is understood that we have acted on community feedback. Newcastleton community totally understand the benefit of community consultation, actively participating in all issues that impact our community and our wider environment. It is appreciated that EJD now recognise this in their processes; the CC accepts your apology on behalf of the residents who felt intimidated and undermined by EJD staff.



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As you concur, local knowledge is paramount in helping maximise the benefits for both your client and the community, it is critical we take the time to review these in detail and to understand their impact; the community will live with them for the next 30+ years. If our interpretation of the Sustainable Forest Management plan is accurate, plans need to illustrate that all three elements of this are addressed. We are seeking to understand what mitigation measures you will employ to achieve them and are confident that working collaboratively this can be achieved and your plan will become compliant, but as presented currently it isn't.

We have altered the design on the north western boundary to remove the conifers on one area and have replaced them with low density native broadleaves. It might be that we need to remove all tree planting from this area of land but await advice from SEPA and further community feedback before we finalise plans for this area. Ideally we'd like to carry out some broadleaf planting in riparian zones, but only if feasible given the site conditions. Regarding the impact on flooding, the proposed tree planting should provide increased flood mitigation downstream of the site. I have worked with Tweed Forum in the past on flood prevention and would welcome the opportunity to do so again. SEPA will opine on our proposals and we will need to follow any advice they give. I am going to discuss the creation of ponds with SEPA and will keep you informed of our plans on this.

We are unable to identify any revision to this section since the plan shown at the community drop-in. As previously suggested, this is an ideal location to plant a riparian scheme and to include ponding and other benefits that can help mitigate flood enhancing the site biodiversity and bringing added environmental benefits. The CC actively encourage you to engage with Tweed Forum/similar, to seek advice on floodplain planting as this will provide broader benefits across habitats. Specifics regarding local flooding are openly available on the SEPA site, examining this will provide greater insight.

- 2. We're working on improving the landscape impact of the northern boundary by introducing more open space and creating a less angular appearance. As soon as we've produced a draft amendment that allows us to keep within the Forestry Grant Scheme grant thresholds we will share it with you.*

Landscape implications are of serious concern to residents. The CC requests sight of a Landscape report along with visual representations for growth from initial phases through the plant cycle as requested at the drop in by members of the community.

NDCC have requested sight of the comments from SBC's regional landscape officer to review how the design fits within the Scottish Borders Woodlands Strategy (SBWS). Given the site composition and size it is not clear to us how the current design conforms to priorities set out in the guidance, but we are happy to review your comments in this context and look forward to receiving a revised proposal for this area in due course.



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3. *We have amended the design in this area to include more open space which will allow more and easier access. We are still working on linking this area with the western part of the site and will share the proposed circular route when we have settled on something that is feasible. I have met with local residents on site to discuss this and think we should be able to find a good route.*
4. *We have included some broadleaves in this area, and currently the design contains just over 15% broadleaves. The main objective of the scheme is to establish productive timber crops and I think this area will be planted.*

Whilst your client's objective is to deliver a productive timber crop, the scheme must also conform to ensure it fits the overall objectives of forestry which are determined on three criteria: economics, social and environmental gains. The community council continues to struggle marrying the current proposals with the strategic objectives and looks forward to seeing evidenced support for the proposals so community concerns can be alleviated.

This is just one site being considered for car parking. I have met with local residents and walked the disused railway looking for path creation opportunities through the proposed woodland and talked about the design of the restock woodland adjacent to the railway. We would welcome the opportunity to work with the community on any proposals they have for improving the experience for visitors, and for enhancing biodiversity. At the open day there were numerous suggestions about car park locations. We would be willing to create new car park opportunities on site and if we could get general agreement on location from the community council then that would be much appreciated.

Any effort EJD can make to help support the community development plan, which in part is based on active leisure (free activities with facilities to attract visitors) is welcomed. The application needs to consider the wider objectives of the Liddesdale catchment area and work to combine efforts with other stakeholders in the area to deliver the best opportunities and outcomes in a holistic context, not just meet objectives of planting targets and owner objectives. In our view, where car parks and paths are sited needs consideration once planting proposals are finalised; the riparian and ponding area will be a natural space of appeal to many if these proceed. Including indicative paths and parking sites on the plan will be helpful going forward and will serve as a basis to move forward this discussion.

Regarding the suggestion that we consider a continuous cover system for the future management of the site, for most of the site CCF would have a negative impact on timber production. Some of the crops however will be managed on a log term retention/continuous cover basis such as the native broadleaves and Scots pine/broadleaf mixture.



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Given the wider benefits associated with the use of CCF the community are struggling to reconcile why with so many varied areas on site this cannot be utilised as a management method. Our understanding is that it can produce high quality timber products meeting your clients' objectives coupled with good quality ground/soil classifications there is the ability to support more mixed species and management options than currently proposed.

SF are actively encouraging all to consider adaptation and to employ this at the earliest opportunity in the planning process to help mitigate climate impacts, particularly significant given the time any outcomes will take to be beneficial; adaptation is an important issue and should be addressed at the earliest opportunity. It is very disappointing that this is not being considered given the climate agenda and forestry's role in this regard.

The CC request more detail on the rationale as to why this cannot be considered in whole or in part as part of the management of this site. Members also requested visual images to review the look of the site in its various phases, can you please provide viewpoints, the CC is happy to identify what these should be based on community requests if this is helpful.

The proposed scheme will provide employment opportunities. I have spoken to local contractors who are interested in doing the fencing and maintenance work. In the first 5 years of the establishment phase there will be an increase in labour requirements compared to the current land use. This will include weeding, beating up, maintenance, management, monitoring and access maintenance and we hope to use local people as much as possible.

As discussed, we are still working on the plans and would welcome the opportunity to meet with members of the CC if they wish to do so. We will keep developing the design as we receive feedback from statutory bodies and the community, and I will share amended plans with you as we respond to feedback during this pre application process.

Thank you for the amends so far, but there are further issues that still need review:

You mentioned **red squirrels** – our understanding is that there are no red squirrels on the site, we are unaware of any efforts to reintroduce them at Flatt Farm but this would be welcomed. Please share specifics on what has been provided so the community can be kept informed. Red squirrels are an important part of our local environment, the community are keen to know what you have done in this respect.

Water supply – contractors have caused concern amongst residents about their lack of understanding regarding location, ownership and potential damage to the pipeline and supply. They were unable to comment on areas left needed for access in the event of repair for example. Can you please provide a response to the community council and the residents



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confirming mitigation measures planned to protect the supply to properties and how residents can access the supply in the event this is needed for repair.

Reports - You will recall I requested copies of relevant preparatory reports, the community continue to ask to see sight of these please. You indicated your web site was currently down, unless this has changed, please confirm how you wish to do this. Improving everyone's understanding of the site and how to maximise its benefits can only help us all be better informed to make the right decision which is in everyone's interest and will speed up this process. We are expecting **hydrology, ecology, wildlife, and ornithology** reports and look forward to sharing these with the community along with the **landscape assessment** report.

Timing – another cause for concern is the references by contractors on site to residents that proposals would be approved and planting completed in January. Whilst this may be desirable, it will be necessary for the consultation to run its course and for the necessary process to happen. The next CC meets on Oct 10th any further decisions and feedback will be reviewed at this point. If reports can be provided in the meantime (paper copies/digital please to allow public display) issues arising from these can also be addressed then.

Cumulative Impact – you will be aware of the significant proposed land use change currently proposed in the Liddesdale catchment, the CC expect this application to also be considered in this context; past and proposed afforestation in the catchment must be consideration so that the positive and negative impacts are understood and form part of the longer term thinking for the development of this already heavily afforested area.

We look forward to hearing from your office.

Regards

B

Barbara Elborn BEM

Secretary Newcastleton Community Council

Cc: NDCC members, Cllrs McAteer, Cox, Smart, Kirsten Logue SOSE, Chris Ryde SF