

Appendix II: LMP Consultation Record

Consultee	Date contacted	Date of response	Issues raised	FLS response
Historic Environment Scotland	07 March 2022	15 March 2022	No scheduled monuments, category A-listed buildings or Inventory gardens and designed landscapes present	Noted (section 4.3)
Ed Tooth RSPB	07 March 2022	10 April 2022	<p>Galloway Glens Black Grouse project referenced with identifying appropriate measures for leks across the plan area specifically referencing Fell of Fleet and Craigherron Leaks</p> <ul style="list-style-type: none"> • enhance brood rearing habitats through increased area and variable density BL restock, • manage conifer regeneration to increase area of scrub moorland / interface zones • limit operations to October to February to minimise lek disturbance • address shortfall of boggy moorland habitat adjacent to lek areas • improve available acid grassland areas potentially through grazing • advance felling of identified coupes 	Noted (section 4.2.4)
Ed Forrest G&SA Biosphere	15 March 2022	19 April 2022	<p>Overall we generally welcome the Plan with primary management objectives relating to timber production, larch removal, Red squirrel habitat, water management and water quality and peatland restoration.</p> <p>Black Grouse is a high focus species in the Biosphere Natural Heritage Management Plan and the Fleet Basin area is critical in terms of the wider Black Grouse project being prepared for Southern Scotland;</p>	<p>Noted (sections 4.1.3, 4.2.4, 4.2.5, 4.5.3 & 4.6.3)</p> <ul style="list-style-type: none"> • Black Grouse management included as objective • Local plan peatland restoration areas included in Region's National targets • Continuous Cover management to be considered where appropriate • Permanent open areas to be kept free from natural regeneration • No current plans for windfarm development

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			<p>we recommend that management for the species is included as a primary plan objective</p> <p>Red squirrel is also a high focus species; we are pleased to see that the species is included as one of the key management objectives and that under 'outcome 1' reference is made to providing suitable elements of mature woodland as a seed/food source for the species.</p> <p>We welcome the intention to restore peatland to enhance priority bog habitats but would urge that the degree of restoration is significant in scale and believe commitment towards a specific target for peatland restoration is necessary</p> <p>With Climate Change impacting on the frequency of storms, droughts, fire risk, increased disease susceptibility and flooding and waterlogging of ground there is a need for a more robust, diverse and resilient woodland; we would urge and welcome any moves towards Continuous Cover type management from both a sustainable production and a biodiversity and landscape perspective.</p> <p>On outcome 2 'Looking after Scotland's National Forests and Land' we welcome many of the actions and prescriptions, particularly those around open land and the intention to raise the condition of Lea Larks and Cairnsmore of Fleet NNR and SSSI's to favourable condition and also the intention to create additional permanent open habitat at elevation across the plan area; we look forward to seeing the prescriptions identified to keep these areas open and free from natural regeneration and the greater use native BL species around the edges to both facilitate</p>	

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			<p>these connected areas and providing additional habitat for Black Grouse and Nightjar and other invertebrate species.</p> <p>We note under outcome '3: National forests and land for visitors and communities' that reference is made to incentivising renewables companies to provide community ownership opportunities and to facilitate renewable energy where it offers community benefits. While it may be the case that the statements relate to small scale renewables or hydro, as the site lies within the buffer zone of the Biosphere and has a relative proximity to the Fleet Valley National Scenic Area; we do not think that the area is suitable for commercial windfarms.</p>	
Suzanne McIntyre Nature Scot	07 March 2022	21 March 2022	<p>NatureScot await a report from Galloway Fisheries Trust, summarising catchment surveys over recent years and would welcome information on critical load assessments for plantation areas in the catchment of these failing and at risk water bodies.</p> <p>Regarding conifer regeneration along riparian corridors NatureScot would like to see the extent of any reduction in proposed restocking across the plan area and see the prescriptions identified to keep these areas open and free from natural regeneration.</p> <p>Regarding NatureScot peatland restoration work being carried out on the Cairnsmore of Fleet NNR, it would be ideal to not only consider replacement of sitka with scots pine or broadleaf but to also address water loss via the existing drainage systems which are connected to areas of peat depth greater than 50cm on the FLS estate but also to peatland restoration areas on the reserve (see peat depth map).</p>	<p>Noted (sections 4.1.6, 4.2.4, 4.2.5 & 4.6.3)</p> <ul style="list-style-type: none"> • Appendix VII refers for critical load assessments • Permanent open areas to be kept free from natural regeneration • Ditch blocking to reduce water run-off is an integral part of any peatland restoration programme Appendix V refers

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			NatureScot would like to see ditch blocking to reduce water run-off as part of any FLS peatland restoration programme.	
Jamie Ribbens Galloway Fisheries Trust	07 March 2022		No reply received	
Jamie Farquhar CONFOR	07 March 2022		No reply received	
Emily Taylor Crichton Carbon Centre	07 March 2022	Consultation page	<p>CCC welcomes FLS engagement with key stakeholders and the opportunity here for FLS to continue working with stakeholders to design and implement a sensitive commercial forestry plan that strives to go beyond the minimum guidelines set out in the UKFS and UKWAS and make a genuine and much needed improvement to natural capital. The area benefits from having the support of the Fleet Catchment Steering Group, a group comprising Galloway Fisheries Trust, the Crichton Carbon Centre, NatureScot, SEPA and private landowners that over recent years has gathered information on peat condition and extent, water quality and peatland restoration opportunities, to help support land managers across the Fleet for catchment scale improvements. The plan is key to restoring the Fleet Catchment and could showcase partnership working and stakeholder engagement for FLS and provide a nationally significant example of catchment-based management to improve natural capital within the context of environmentally sensitive commercial forestry operations.</p> <p>CCC recognises that the Fleet catchment is acid sensitive (as demonstrated from water analysis</p>	<p>Comments noted (sections 4.1.6, 4.6.3 & 4.7.2)</p> <ul style="list-style-type: none"> • Targeted enhanced riparian buffers (as guided by stakeholders) • Minimise restock of deep peat • Permanent open areas to be kept free from non-native conifer natural regeneration

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			<p>carried out by Galloway Fisheries Trust with support from NatureScot, Crichton Carbon Centre and Peatland Action over recent years) and that FLS management seeks to improve water quality for wild fisheries and that the management of peatland restoration is specifically identified as an Outcome 2 in the draft design.</p> <p>CCC agrees that key priorities for the plan should be to Improve water quality within Fleet Basin catchment(s), maintain and enhance plan area for priority species (Red squirrel and Black Grouse), and Contribute to the Scottish Government's Climate Change Plan (Carbon sequestration) recognizing that action is required to improve the condition of the catchment. This plan offers an opportunity to halt biodiversity decline and tackle climate change by improving ecological function and quality of peatlands and freshwater.</p> <p>CCC feels that enhanced riparian buffer zones that exceed minimum guideline recommendations need to be carefully considered and targeted based on data and understanding from key stakeholders (Galloway Fisheries Trust in particular)</p> <p>Artificial drainage across the catchment (including forestry drains) has an extensive and cumulative impact across the catchment and contributes to frequent low pH events into watercourses particularly during winter months (a sensitive time for fish). Natural watercourses and actions by NatureScot to block open hills drains and improve peatland condition will only have a limited impact due to the extent and severity of existing forestry drains (some</p>	

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			<p>areas of severe drain erosion have worsened following the winter of 2021/2022. CCC see key to restoring a natural hydrology in riparian areas is reducing the frequency and severity of acid flush events so recommend that all artificial drainage networks cutting through peat should be blocked in riparian zones as a minimum to disconnect these sources of acidic waters (often below pH4) reaching natural watercourses (wet woodland creation should be considered if planting is to take place in these areas).</p> <p>The Little Water of Fleet catchment is prone to pH's below 5 following winter rainfall events, a figure below which may be life critical to salmon and may well be a major contributing factor for the low numbers now spawning in the catchment and general decline in salmon. As identified by Galloway Fisheries Trust, there are areas which should be supporting populations of fish (trout and salmon) where habitat is good but only sporadic numbers have been recorded. Future restocking plans must take this, and potential long term carbon impacts of forestry on deep peat, into consideration based on current and future understanding as data and evidence presents itself.</p> <p>All areas of restocking on deep peat should not only meet the minimum criteria for restocking they should also be assessed for potential negative impacts on water quality, biodiversity and habitat provision.</p> <p>CCC have concerns on the reliance on natural regeneration to provide more diverse woodland and</p>	

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			<p>the creation/establishment of peatland edge woodland.</p> <p>More detail is required on how these areas would be managed to suppress extensive regeneration of non-native conifers and FLS require well-resourced and long-term plan to address naturally regenerating areas of dense conifers that provide little biodiversity, timber production or even carbon benefits.</p>	
Chris Rollie Galloway Raptor Group	07 March 2022		No reply received	
Pip Tabor Southern Uplands Partnership	07 March 2022		No reply received	
Alasdair Hendry Scottish Forestry	07 March 2022		No reply received	
Kat Fingland Saving Scotland's Red Squirrels	07 March 2022		<p>We are keen to minimise the impact of any forestry work on the local red squirrel population whilst acknowledging that commercial conifers will be subject to cycles of felling and restocking, and that other factors also need to be considered such as windthrow. As red squirrels are known to be present in the area, we would expect that, with regard to planning felling works, all the relevant surveys are carried out in advance and the work is planned to factor in the breeding season. We would appreciate if you could take into consideration ways of improving/maintaining the habitat for red squirrels – such as providing continuous cover, long-term retention, small-coupe felling and, when planning felling, take into account the movement of squirrels and habitat connectivity. Other aspects to consider</p>	Noted (see section 4.2.4)

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			include planting regimes, which include a mix of species and age class to allow for a continuity of food supply. We would suggest that, alongside the felling permission, landowners and contractors are made aware of the risk and responsibility they have to resident red squirrels, and are made aware of surveys to be conducted in advance of felling activities (https://forestry.gov.scot/publications/24-forest-operations-and-red-squirrels-in-scottish-forests). Many thanks.	
Simon Watt SEPA	15 March 2022		No reply received	
Sharon Fishwick New Galloway Community Council	15 March 2022		No reply received	
Simon Fieldhouse D&G Council	15 March 2022		No reply received	
R Goodman Meikle Cullendoch Neighbour	16 March 2022		No reply received	
Iain Wilson Tracy Cook Jean & Ken Clarkson Nila Hempstock Neighbours	20 April 2022	20 April 2022	Downstream flooding of access road to properties by Water of Fleet (usually at high tide)	Comments noted and mitigation measures identified (see section 4.7.3)
Ken Clarkson Drumruck Neighbour	23 May 2022	23 May 2022	Flooding of property owing to obstructed drainage on FLS estate Potential danger to property from wildfires	Comments noted and mitigation measures identified (see section 4.8.1)

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			Species diversity and planned restock around property locus	