

24 MAR 2009

Whitewalls
1 Barclay Park
Aboyne AB34 5JF

Michael Bruce Esq
Glen Tanar

23 March 2009

Dear Michael

Thank you for inviting me to the "scoping" meeting for Glen Tanar in the Victory Hall, last Saturday. I found the display interesting and informative and have just two comments, both of which I told to Mr Baird.

The first is about recreation. The requirements of mountain bicyclists are different from ordinary cyclists and of course from walkers. While you have many admirable walks in your forests and glens, mountain bicyclists will be interested in getting on to your high ground and in cycling over the periphery of the estate. I don't know whether you would wish to encourage this but if so, provision for them to get from one track to another so as to complete a circular route is worth considering. This provision doesn't need to be expensive or ambitious – perhaps just a narrow swiped path along which cycles can be carried between existing tracks or a sign showing that if one leaves a track at its end and walks a certain distance, one can be sure of finding a continuing track along the rigging or down a glen a little further on.

Secondly, I am interested in deer. You have shown considerable interest in balancing deer densities to forestry management over many years and the results of positive thinking are shown on your maps. But this thinking has not been paralleled in Glen Tanar or in most other Mounth estates by similar forward thinking on deer management. In this respect, Continental deer managers are decades ahead of their Scottish counterparts. I described a practical Austrian scheme in the journal *Forestry* as long ago as 1969, describing a large widespread deer management project that began 20 years before that. In this management, the aim was to stop damage to crops and trees by red deer and at the same time to increase greatly the value of the red deer as trophy animals for stalking. Management involves enclosing the deer in winter, as has been done successfully by Glen Muick and unsuccessfully by Ballogie. The methodology is described in detail in the *Forestry* paper and summarised in my book *Of Partridges and Peacocks – a life in wildlife ecology and wildlife management* which is on sale in Aboyne. Briefly, the enclosures in Styria in which the deer are temporarily enclosed and fed each winter extend to about one acre per deer and in 1969 over 125,000 acres of deer ground, roughly comparable to the Mounth estates, there were 22 enclosures. Damage to trees outside the enclosures stopped and there was little other conflict. All stags aged 4 years or older were Royals or considerably better.

With kind regards and good wishes



David Jenkins



for birds
for people
for ever

Michael Bruce
Glen Tanar Estate
Brooks House
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- 1 APR 2009



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30 March 2009

Dear Michael,

Glen Tanar Estate Forest Plan

Thank you for inviting me to the Glen Tanar Estate Forest Plan scoping meeting. I was not able to attend on the 23rd, but was able to speak to Tim Poole before he went, and this letter incorporates many of Tim's points. Below, I have set out a few comments about the plan which I hope arrive in time to be considered - mostly queries, observations or requests. In general, I think the plan takes into account well the various issues relevant to bird conservation, and we are happy in a general sense to support the proposals.

My comments are as follows:

1. Sylvicultural systems

We welcome the adoption of low impact sylvicultural systems such as shelterwoods, where possible. This is likely to have a beneficial effect on many of the bird species (and indeed other wildlife) present in most of the estate's plantations. Similarly, thinning regimes carried out as normal should encourage the development of richer ground vegetation and greater wildlife benefits.

2. Proportions of various conifer species away from the native pine areas.

The maps supplied provide valuable information about general felling possibilities and general woodland types on Glen Tanar as a whole. However, within the Scoping Report, a stocking map showing tree species composition and possible changes over time would be very helpful, in order to assess the likely long-term impacts of this. Over time, a continuation of the focus on predominantly native plantation species (i.e. Scots Pine) coupled with some retentions of Norway Spruce and Larch would be desirable, including some restocking of these two species in small patches, especially in the areas away from the native pinewood core. Removal of non-native species in inappropriate or sensitive areas, as proposed, is welcome.

3. The importance of Larch in the estate's plantations

Point 2 above is especially relevant to the need to ensure a proportion of Larch within the estate's plantations. Some of the research that is being carried out by ornithologists within Deeside is clarifying the importance of this conifer for some of the significant bird species present, including all species of Crossbill. The Glen Tanar Special Protection Area is in part designated for Scottish Crossbills, but Parrot Crossbills are also present, and all crossbill species use the plantations on the estate as well as the native pine woodland. In planning to manage for Scottish and Parrot Crossbills, it necessary to consider the native and non-native woodlands of the estate as a 'management unit'.

Larch is very valuable for birds. Its buds provide food for Bullfinch, Brambling, Black Grouse and Capercaillie in spring. Many finches (Crossbills, Siskins, Redpolls, Goldfinch, Brambling and Chaffinch in that order) use Larch because it retains seeds in its dehiscent but upright cones for several years. Larch thus gives a buffer to bad seed years in other conifers, and is often used by crossbills in summer after Scots Pine seed has fallen.

Currently, Scots Pine, Lodgepole Pine, spruces and Larch are used by Scottish Crossbill in winter - Scots Pine mainly in the breeding season. In winter, they prefer spruce or Larch but often spruce has no seed, whereas Larch seed is usually present. Lodgepole seed is always available but Lodgepole has only a small forest area in Deeside. Occasionally there is no seed other than pine, and Scots is as easy to get at as Lodgepole. In these years, Scottish Crossbills use Scots Pine but then come into close proximity to Parrot Crossbills. We know they hybridise, and it is thought there might be competition, with Parrots having a selective advantage in semi-natural woodlands. The evidence for this is that Parrots are resident in semi-natural pinewoods - Scottish are usually summer visitors, having wintered in nearby exotic conifers.

Thus, if Larch is retained, there is a good chance of retaining Scottish Crossbill, based upon existing spatial distribution of crossbills in relation to the distribution of conifer species within existing forests. So we would advocate retaining areas of Larch in intimate mosaic with Scots pine (or small intermingled blocks) in the generally pine-dominated plantations of the estate. Superficially, European larch appears to be better than hybrid or Japanese Larch for wildlife, but any Larch species is of value as outlined above.

4. Management of areas near to Capercaillie leks and brood habitat

Glen Tanar estate has played a leading role in Capercaillie conservation and we know that you are well aware of the complexities of this issue. I am sure that you will be planning retentions around Capercaillie lek areas and over important brood habitats, to maintain the necessary shade regime to encourage blaeberry. Some of these need to be quite large – certainly larger than 10 ha in area. To that end, some of these areas shown as suitable for felling before 2018 in the east of the estate need to be considered carefully in this context, though low-impact or limited felling may be appropriate.

5. Deer management and forest understory disturbance/management

If the main perimeter deer fence is to be replaced, it would be best if it stayed in the same position on the open hill acting as a shield against Glen Muick. Within this, the continuation

of scarification and burning selected areas of native woodland and of plantations is desirable, and I am sure this is being planned.

6. Wetland habitat restoration

It would be very useful within the plan to identify all areas within the native forest and plantations where wetland restoration might be possible, which could be linked with replacement of non-native conifers in some areas, together with an examination of any possible drains within the plantations especially that could be infilled or blocked. There may be only limited possibilities given the topography but even small scale wetlands could have a considerable benefit.

7. Management of public access

I understand that the development of 'recreational zoning' areas was discussed at the scoping meeting. This is something we would support, since I think everyone would agree that access needs to be managed in a way that does not contravene access rights but which allows certain areas of the forest to remain relatively undisturbed. Perhaps this might involve the gradual reduction in maintenance of some tracks, to allow lower volumes of recreational access, if this fits with other management objectives.

I hope you find these comments helpful, and I look forward to seeing the Scoping Report and eventual Forest Plan in due course.

With best wishes,



Ian Francis
Area Manager, NE Scotland

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- 2 APR 2009

If telephoning ask for:
Zoe Griffin

30 March 2009

Dear Michael

GLEN TANAR ESTATE - FOREST PLAN SCOPING MEETING – STAKEHOLDER CONSULTATION

Thank you for inviting SEPA to the scoping meeting to discuss the above. SEPA does not routinely attend such meetings, but is always willing to advise on specific issues insofar as its interests are involved upon request. SEPA has the following comments to make on the plan.

GENERAL COMMENTS

In general, with regards to woodland management, if the proposals accord with the Forest and Water Guidelines and follow best practice it is unlikely that SEPA would have major issues. The Working Checklist at the back of the Guidelines is particularly important to observe in planning and carrying out operations on site.

Specific care should be taken when working in areas close to watercourses, which includes ditches, to ensure that pollution does not occur. As highlighted within the Forests & Water Guidelines, surface water drains should not discharge directly into the water environment and, where applicable, you should seek to address existing drains of this type to avoid siltation problems during and after forestry operations. Further useful guidance is also included within "Restoring and Managing Riparian Woodlands" from Scottish Native Woods and, in relation to watercourse and lochan management, two books from SEPA, both available on SEPA's website www.sepa.org.uk, "Ponds, pools and lochans" and "Watercourses in the community."

SPECIFIC COMMENTS

Water Framework Directive Implications – Water of Tanar: The Water Framework Directive has now been translated into Scottish Law by the Water Environment and Water Services Act (Scotland) 2003. The objectives of the Directive include preventing deterioration and enhancing status of aquatic ecosystems. It requires that all waters in member states aim to achieve at least 'Good' ecological status by 2015.

Following SEPA's 2004 consultation entitled "Pressures and Impacts on Scotland's Water Environment", SEPA has produced draft River Basin Management Plans for the Scotland and Solway Tweed River Basin Districts. These plans are supplemented by a series of Area Management Plans which are currently undergoing a statutory six month consultation (January to June 2009). Final plans for 2009 to 2015 will be published in December 2009. These reports include a detailed description of the impact of human activity on surface waters and groundwaters. They also identify those water bodies (water management units) that are at risk of failing to meet the Directive's environmental objectives and put measures in place to improve them. The Plans can be viewed on SEPA's website at www.sepa.org.uk/water/river_basin_planning.aspx



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Of relevance to this plan Water of Tanar has been identified as being of 'moderate' ecological status and therefore does not meet the Directive's objectives due to forestry activities acting as a morphological pressure. This is potentially due to:

- Modifications to the watercourse such as culverting.

More information on this matter can be found through the interactive map facility available on SEPA's website at www.sepa.org.uk/water/river_basin_planning.aspx

The review of the plan should address, if relevant to the forestry operations, how an improvement in the ecological status of this water body could be attained by way of, for example, removing culverts and no further new culverts should be introduced for forestry operations.

Should you wish to discuss the above I can be contacted on Tel: 01224 424655

Yours faithfully



Zoe Griffin
Planning Unit (North Region)

REGULATORY ADVICE

The Water Environment (Controlled Activities) (Scotland) Regulations 2005 (as amended) (CAR)
From 1 April 2006 CAR replaced the Control of Pollution Act and Groundwater Regulations. These new regulations not only control discharges to watercourses and groundwater but also cover abstractions, impoundments and engineering works within and in the vicinity of inland surface waters. This means that activities such as culverting, ditch clearing, dredging, bridging and damming may now require to be authorised under CAR.

Since the introduction of CAR in 2006 SEPA has agreed a policy on regulation of engineering activities affecting small and minor watercourses and if a watercourse is not visible on a 1:50,000 OS map then authorisation from SEPA will only be required for permanent diversions, culverting for land gain or dredging (other activities such as sediment management, bank modifications, bed reinforcement and river crossings will not require authorisation for these minor watercourses).

There are three levels of authorisation under CAR: General Binding Rules (GBRs), Registrations and Licences. The publication 'The Water Environment (Controlled Activities) (Scotland) Regulations 2005: A Practical Guide' provides very useful advice on CAR and it is recommended that all applicants consult this document which is available both from SEPA's website at www.sepa.org.uk/water/water_publications.aspx and from local SEPA offices.

Full details of CAR including how to register or make an application can be found on SEPA's website or by contacting the Environment Protection and Improvement team in the local SEPA office in Aberdeen.

Waste Management Licensing (Scotland) Regulations 1994 (as amended)

SEPA encourages waste minimisation and reuse/recycling whenever possible. Further details can be found on SEPA's website (found at www.sepa.org.uk/waste/resource_efficiency.aspx)

The recovery and reuse of controlled waste should be made in accordance with the Waste Management Licensing (Scotland) Regulations 1994 (as amended). Some activities involving waste materials are, however, exempt from licensing if they meet the requirements detailed in Regulation 17 and 18 of the above Regulations.

Although an activity may be exempt from licensing, it is still subject to statutory controls to prevent environmental pollution and harm to human health. Therefore details of the activity must be registered with the local SEPA office.

For example the following are exempt activities:

- the burning of less than 10 tonnes per day of wood, bark and plant matter on the land where it is produced (under paragraph 30 - there is not a fee for this registration), although SEPA does not encourage burning of any waste but rather supports retention of carbon in the local ecosystem to reduce carbon dioxide loss and benefit biodiversity;
- the spreading on land used for agriculture of any of the listed wastes (which includes, for example, sawdust shavings from wood processing) where such treatment results in benefit to agriculture or ecological improvement (under paragraph 7);
- composting biodegradable wastes (under paragraph 12); and
- keeping or deposit on site of own excavated materials from peat-working (under paragraph 33 - there is not a fee for this registration).

When redundant fence posts and wire are to be removed and they cannot be recovered or reused (weathered fence posts can support significant populations of flora and fauna) then they must be disposed of to a licensed facility.

Further details on waste management issues can be found on SEPA's website or by contacting the Environment Protection and Improvement team in the local SEPA office.

Received by e-mail

Glen Tanar Estate has been over the past 40 years a major and important supply source of Round Timber to, primarily, our Aboyne Burnroot Sawmill, and also our mills at Kirriemuir, Mosstodloch and Kinnoir.

We are presently looking closely at future developments and investment in the North area of our operations and would be very interested in forming a Long Term Agreement for the supply of timber from the Estate which would be of benefit to both parties, such an arrangement could tie in with the New Forest Plan to give continuity of timber supply, work for Harvesting/ Haulage contractors and better/ more stable timber prices in the future.

Our Burnroot mill, on the Glen Tanar Estate, presently employs 42 on site and a further 5 office personnel. "Downstream" we indirectly employ, locally, a further 18 in timber harvesting, 12 in round timber haulage and 12 in sawn timber haulage. A further 15/20 local Deeside contractors are involved in engineering/ electrical and associated operations and are on site on a regular basis.

We have invested in excess of £10 million on the site over the past 20 year period, since the building of the present mill, including £600k on environmental controls and, most recently, £1.2 million on our new Bio Mass Plant.

The site generates in excess of £5 million per annum, £3.5 million of which is generated in the local Deeside community area.

Glen Tanar Estate will continue to play a vital role/ part of our future plans and it is therefore imperative that every consideration is given to maintaining the commercial sustainability of the Estate in the medium to long term. Decisions to remove forests from commercial production now will have serious impacts on the Forest Industry, and ultimately the local economy in this sector, in the future.

Iain E Mackenzie
James Jones & Sons Ltd
Aboyne Harvesting Manager