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Conservator: John Risby

05-Feb-2026

Case reference: EIA-1906

Property name: Glenmoriston Estate

EIA SCREENING OPINION

The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017

I refer to your application Glenmoriston Estate at Invermoriston which contains proposals for 65.97 hectares of afforestation.

We are required to provide a Screening Opinion under the above Regulations as to whether the work you are proposing is an EIA project and will require EIA consent.

I can confirm that the work you propose will require EIA consent for the following reasons:

Description of Forestry Project and Location

The Screening Opinion Request (SOR) omits detailed specifications for proposed deer fencing required for this afforestation project and fails to provide baseline data on existing fencing within the wider project area, both of which are fundamental in the assessment of potential cumulative impact.

Description of, and Avoidance and Prevention of Likely Significant Effects

The SOR and supporting information does not provide the level of detail required to assess impact significance on the following environmental receptors:

Biodiversity – Levishie Site of Special Scientific Interest (SSSI)

Scotland contains approximately 148,000 hectares of ancient woodland, representing just 1.9% of its land area. Woodland SSSIs are among the most significant remnants of these unique forest habitats, noted for their exceptional biodiversity and long-standing continuity of woodland cover, often spanning thousands of years.

The SOR makes no reference to the neighbouring Levishie SSSI woodland designation, currently in unfavourable condition due to overgrazing by deer. Although a Deer Management Plan (DMP) was prepared at NatureScot's request, it does not sufficiently address critical considerations, including:

- Potential impacts on Levishie SSSI;
- Deer welfare and behavioural changes resulting from additional fencing; and
- NatureScot's requirement for a compensatory cull.

Whilst the DMP acknowledges the need to reduce herbivore impact to facilitate natural regeneration it fails to address the elevated deer population, proposing only to maintain existing cull levels. It further notes that displacement may increase browsing pressure within forested areas but provides no information on measures designed to avoid or prevent significant negative impacts.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and we have been unable to conclude that it will not result in significant negative environmental impacts.

Biodiversity – Black grouse

Black grouse are a Red Listed species in Scotland, signifying the highest level of conservation concern due to severe long-term population and range declines.

A black grouse survey was undertaken in support of the request for a screening opinion. The timing of the survey within the proposed eastern enclosure (20 and 31 May) coincided with the end of the lekking season, which in Scotland typically peaks from April to mid-May. One of two survey visits (14 April) of the proposed western enclosure was hampered by poor visibility caused by low cloud and fog.

Best practice recommends a minimum of three site visits in calm, clear weather. Consequently, there is a risk that some lekking activity was not recorded, which is acknowledged by the consulting ornithologist in the black grouse survey report. The current dataset may therefore significantly underrepresent the presence and activity of black grouse in the area proposed for afforestation.

RSPB Scotland were consulted during project planning. As per their advice, commitments to schedule operations outside the lekking and breeding season (mid-March to end of August) and to mark deer fencing with wooden droppers to reduce collision risk have been set out in the SOR, however the size and spacing of droppers have not been specified, nor have sections of the fence that are to be marked been identified on any maps submitted in support of the request for a screening opinion.

RSPB recommendations to adjust fence locations in the western enclosure and maintain minimum buffer zones around lek sites have not been adopted in the proposed design. Given the proximity of the proposed deer fence to an existing lek and powerline, these design choices could significantly increase the likelihood of bird collisions, increase mortality and disturbance of black grouse.

Accurate prediction of potential impacts and the development of effective measures to avoid or prevent likely significant effects require robust quantitative data collected during the optimal survey period.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and we have been unable to conclude that it will not result in significant negative environmental impacts.

Biodiversity – Upland breeding birds

The Phase 1 Habitat Survey undertaken in support of the request for a screening opinion confirmed that areas proposed for afforestation provide potential nesting habitat for upland breeding bird species. A full moorland breeding bird survey for the proposed afforestation area was requested by Scottish Forestry (SF) to support the SOR, however this was not undertaken. Instead, a limited survey (map) undertaken for a proposed underground cable and overhead-powerline corridor nearby was submitted. This map excluded the areas proposed for afforestation. The information that was provided however recorded red and amber listed species and contained no recommendations by the consulting ecologist, underscoring the requirement for a comprehensive breeding bird assessment. As set out above accurate prediction of potential impacts and the development of effective measures to avoid or prevent likely significant effects require robust quantitative data.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and we have been unable to conclude that it will not result in significant negative environmental impacts.

Soils – deep peat

Deep peat soils (organo-mineral soils with a depth greater than 50cm) are considered a sensitive area under 'The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017'. The initial concept map indicated extensive deep peat within the proposed planting areas. Following feedback from SF an updated map was provided showing reduced peat coverage, however, on cross checking the revised information and planting design some areas proposed for afforestation still contain deep peat. A site inspection by SF confirmed deep peat in several of these areas, indicating that the afforestation proposals still require revision to avoid significant effects and protect deep peat soils.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and we have been unable to conclude that it will not result in significant negative environmental impacts.

Landscape – Visual impact

Forest design should strengthen the character of the local landscape and deliver a positive visual contribution. While the SOR references Landscape Character Types, it provides no substantive evidence of applying forest design principles. Furthermore, it fails to justify the proposed fence location in relation to landscape characteristics or visual amenity. The assumption of no visual impact from the A887 public road, as it is not visible from that location, is noted; however, the absence of an assessment from alternative frequented viewpoints within and nearby the proposed enclosures represents a significant omission.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and we have been unable to conclude that it will not result in significant negative environmental impacts.

The SOR and supporting information provides sufficient detail to assess impact significance on the following environmental receptors:

Biodiversity - Otters

A Phase 1 Habitat Survey submitted in support of the screening opinion identified evidence of otter activity within the site boundary. Two spraints, one old and one fresh, were recorded along the Allt Ceann an Achaidh watercourse, which runs south through the eastern enclosure. Though otters may use the site's watercourses when traveling upstream from the River Moriston, the consulting ecologist confirmed no resting areas or breeding holts were present that would restrict tree planting. Furthermore, no mechanical operations are proposed within riparian areas.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and has been found to have no significant negative environmental impacts.

Biodiversity - Protected and sensitive habitats

A Phase 1 Habitat Survey submitted in support of the screening opinion identifies several habitats within the survey area that have the potential to support Ground Water Dependant Terrestrial Ecosystems (GWDTE) and recommends measures designed to avoid potential impacts. The measures identified within this report comply with CONFOR (2018) 'Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals' and the SOR includes a commitment to adopt these measures in full. Species rich GWDTE, springs and flushes are excluded from the planting design, and 20m open ground buffer areas will be applied, as identified on Survey Map – Figure 3 – Sensitive Habitats.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and has been found to have no significant negative environmental impacts.

Cultural Heritage - Archaeological features

An archaeological walkover survey has been undertaken in support of the request for a screening opinion. Archaeological sites identified within the proposed enclosures are comprised of turf and stone boundary and enclosure dykes, which define the upper limits of a settlement zone. These features are linear and comprise two connecting features, as identified on the Final Design Map. The other feature identified was located outwith the proposed planting area south-west of the proposed eastern enclosures boundary, comprising farmsteads and their associated enclosures and field systems. The Archaeology Report, recommends a series of protective measures intended to minimise or avoid adverse impacts upon cultural heritage assets and the SOR contains a clear commitment to adopt these measures in full:

- Buffer zones incorporated within the proposed planting design align with those recommended in the UK Forestry Standard, as identified on the Final Design Map.
- No forest operations will take place within at least a 5m buffer either side of turf and stone boundary and enclosure dykes, and any new trees self-seeding within these zones will be removed in the future as part of a site management plan. If dykes have to be tracked over by vehicles, this will take place at natural breaks in the features, or within sections of the dykes that are already significantly degraded. Archaeologist advice confirms any impact from proposed fencing across sections of dykes will be minimal.
- Buffer zones of at least 20m have been applied to non-linear archaeological features located outside the south-west boundary of the eastern enclosure to protect them from access through the landscape by tracked vehicles.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and has been found to have no significant negative environmental impacts.

Water – Watercourses

Several watercourses are located within the boundary of the afforestation proposal. These are clearly identified on all proposal maps submitted in support of the request for a screening opinion. The NWC Concept Map demonstrates watercourses have been buffered with open ground in accordance with industry best practice. Minimum working distance buffer areas for watercourses have been determined according to the width or nature of each watercourse, only hand screefed planting will take place within these buffers to establish riparian woodland. No mechanical forest operations, storage of pesticide or fertiliser will take place within the buffer areas stated in the Controlled Activities Regulations General Binding Rules and the UK Forestry Standard Forests and Water requirements.

The above issue has been assessed against The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 and has been found to have no significant negative environmental impacts.

Stakeholder Engagement

The outcome of discussions held with NatureScot, including comments and advice with regards to deer and protected sites are not fully captured or addressed within the request for a screening opinion. The outcome of discussions held with RSPB, including comments and advice with regards to black grouse are not fully captured or addressed within request for a screening opinion.

Conclusion

In reaching our decision we have considered the information you have provided with the request for a screening opinion, stakeholder responses and other existing environmental information for the area, including a comprehensive walkover of the site by SF staff. Based on this information, we consider the current design of this afforestation project could have complex, long-term, or irreversible impacts on the environmental sensitivity of the area, with particular regards to its biodiversity and soils. We have therefore concluded that expert and detailed analysis of those impacts would be relevant to whether or not the proposal can be consented.

UKFS compliance

Of the remaining issues identified in the SOR and issues log, (in other words those which we do not regard to be significant in terms of EIA and do not form part of our Scoping Opinion above) we do not consider all of these to have been fully explored and appropriately addressed. To enable us to conclude our UKFS assessment of these elements of the afforestation project, we advise that further information clearly explaining the actions and decisions made and response to each specific issue is presented in the usual format for an 'Issues Log' and included in the package of information for Scoping.

General Forestry Practice – Forest planning considerations

Expansion of forest cover in appropriate locations is encouraged across the UK. Woodland creation, whether expanding existing forests or creating new ones, should take account of impacts on the site and surrounding area. Planning and design should address all aspects of sustainable forest management in order to deliver a range of benefits for the future.

We remain unconvinced of the sites potential to establish productive Scots pine woodland. High impact forestry practices used in the past to significantly alter site characteristics, are no longer acceptable. Only a site-orientated approach to tree species selection will allow sustainable forest management to be practiced. Establishing productive woodland on marginal ground could exacerbate climate impacts through high soil disturbance and multiple fertiliser application.

Ecological Site Classification (ESC) data indicates marginal productivity (yield class 4) with soil moisture regime classified as Wet and soil nutrient regime as Very Poor. A site walkover by SF staff confirmed the sites unsuitability for productive woodland. It is critical that site and climatic constraints of this site are more carefully assessed for the potential for woodland growth and that the appropriate species and silviculture are chosen to ensure successful establishment.

General Forestry Practice – Operational planning

Operational plans aim to make forestry practice more efficient and to ensure that important site features are identified and protected in advance.

Further engagement with SSE is required to determine whether the proposed planting design sufficiently accommodates existing overhead and underground power lines within the afforestation project area.

Forests and Biodiversity – Ancient semi-natural woodland

The implications of woodland creation and management for biodiversity and ecological resilience in the wider environment should always be considered.

The Phase 1 Habitat Survey undertaken in support of the SOR confirmed the presence of ancient woodland along the Allt Loch a' Chrathaich watercourse within the proposed western enclosure, also recorded in Scotland's Ancient Woodland Inventory. The SOR makes no reference to the presence of this sensitive habitat or outline measures designed to avoid or prevent adverse impacts. Furthermore, the planting proposals map indicates that areas within and around ancient woodland remnants are proposed for planting, which is at odds with Scotland's Forestry Strategy and the UK Forestry Standard, which promote the protection and expansion of native woodland primarily through natural regeneration.

Forests and People – Public access rights to forests

In Scotland, the provisions of the Land Reform (Scotland) Act 2003 must be complied with; as an owner or manager of land or water in Scotland, you must manage that land in a way which is responsible in respect of the public's statutory access rights.

The SOR sets out that "an open access policy is upheld as per the Scottish Outdoor Access Code" and that "Gates will be left unlocked, and stiles will be installed for access", however the specification and number of these have not been provided, nor are any access points identified on any maps submitted in support of this statement.

Next Steps

It is recommended that you contact us to request a Scoping Opinion, which will provide information that is to be included in your EIA Report.

We must consult statutory consultees during the scoping process, so we recommend you arrange a Scoping Meeting, inviting SF and all of the necessary organisations and individuals that can contribute information or that may be affected by your EIA forestry project.

We advise this includes:

- Nature Scot
- Highland Council: Forestry Officer, Historic Environment, Access Officer
- Scottish Environment Protection Agency
- Historic Environment Scotland
- RSPB Scotland
- Glenmoriston Deer Management Group
- Corrimony Estates

- Trees for Life – Dundreggan
- Forestry and Land Scotland
- SSE
- Scottish Water
- Fort Augustus and Glenmoriston Community Council

If you do not hold a Scoping Meeting we will still require the following information to consult independently.

- A description of the location of your forestry project;
- A map identifying the land;
- A description of the nature and purpose of your forestry project and its likely effects on the environment; and
- Any other information that you wish to provide e.g. any avoidance, off-setting or mitigation measures.

Guidance on EIA for forestry projects can be found at: <https://www.forestry.gov.scot/apply-for-EIA-consent>

It is recommended that you now contact us to request a Scoping Opinion, which will provide the information that is to be included in your EIA Report.

We must consult statutory consultees during the scoping process, so we recommend you arrange a Scoping Meeting and invite all of the necessary organisations and individuals that may have an interest in your EIA forestry project.

We advise this includes • Nature Scot

- Highland Council: Forestry Officer, Historic Environment, Access Officer
- Scottish Environment Protection Agency
- Historic Environment Scotland
- RSPB Scotland
- Glenmoriston Deer Management Group
- Corrimony Estates
- Trees for Life – Dundreggan
- Forestry and Land Scotland
- SSE
- Scottish Water
- Fort Augustus and Glenmoriston Community Council who can contribute information or may be affected by your proposals.

If you do not hold a Scoping Meeting we will still require the following information to consult independently:

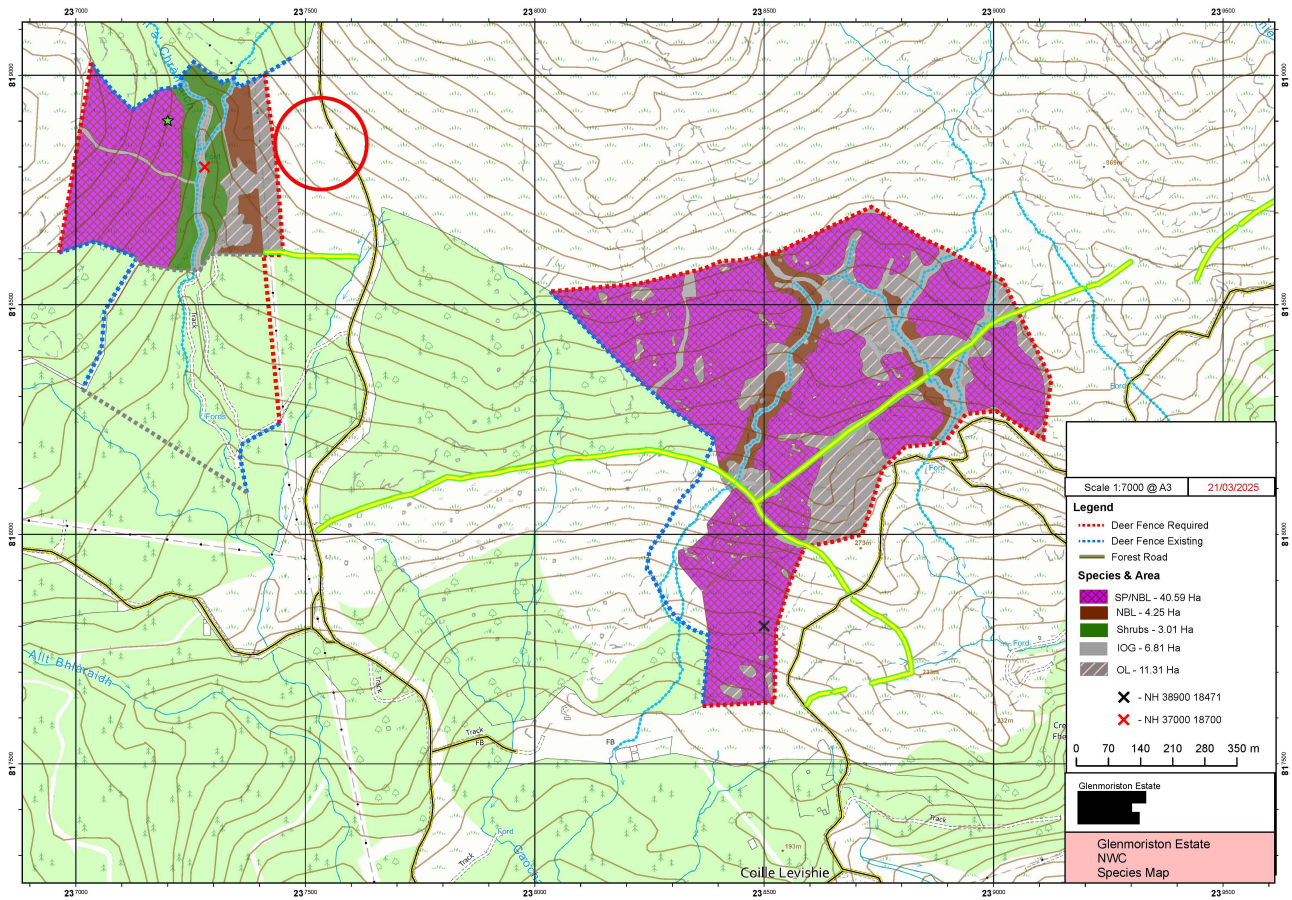
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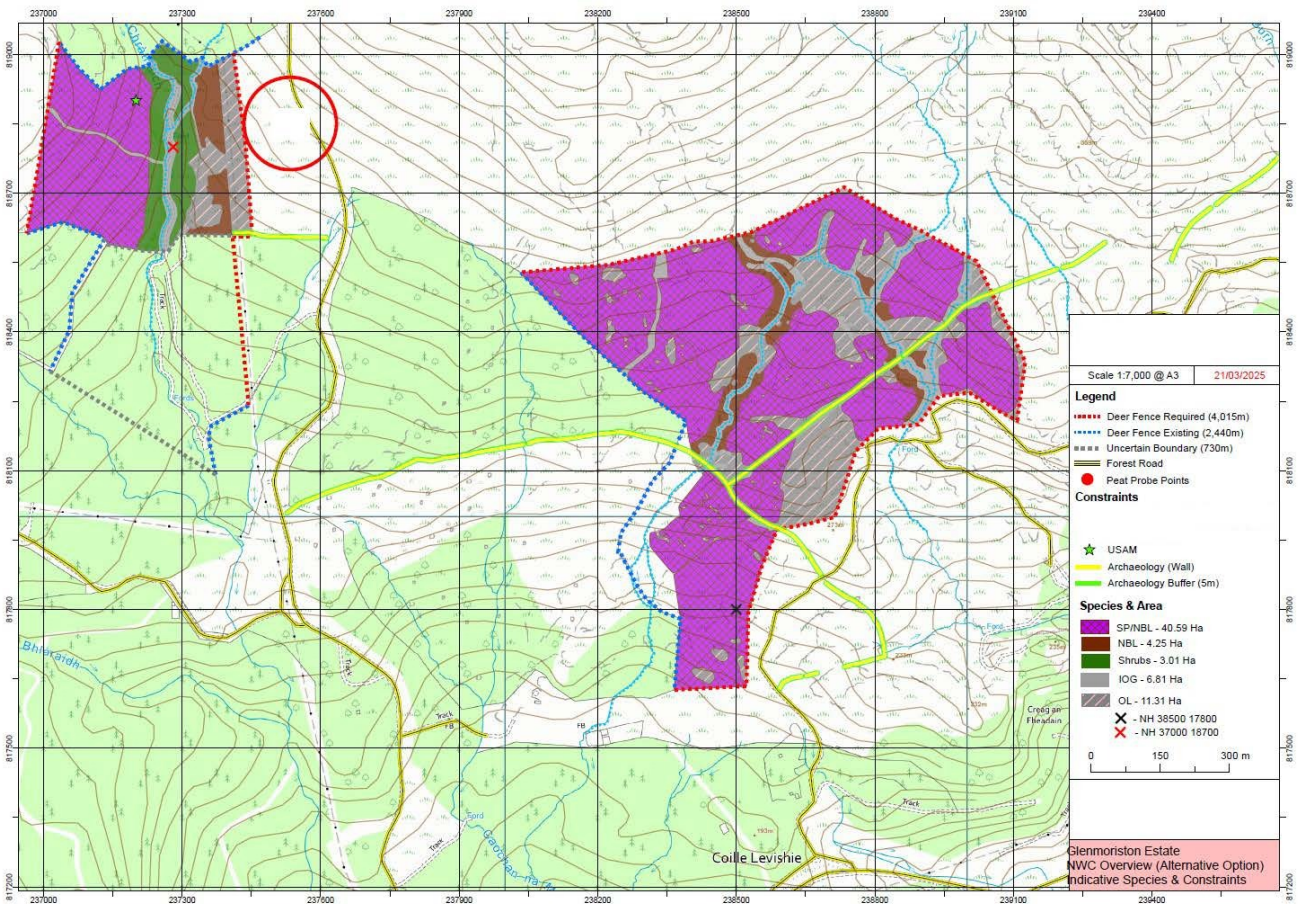
<https://forestry.gov.scot/support-regulations/environmental-impact-assessment>

Please find below map(s) for this project:

EIA-1906 - Glenmoriston Estate - Glenmoriston - Version 1.0 - 25-Apr-2025



EIA-1906 - Glenmoriston Estate - Glenmoriston - Version 1.0 - 25-Apr-2025



Yours sincerely

Martin MacKinnon
Approving Officer

Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation

Is e Coilltearachd na h-Alba a' bhuidheann-ghnìomha aig Riaghaltas na h-Alba a tha an urra ri poileasaidh, taic agus riaghladh do choilltearachd

