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Glen Earrach Pumped Storage Hydro

Environmental Impact Assessment Report

Volume 2: Main Report
Chapter 18: Forestry

Glen Earrach Energy Ltd

Glen Earrach AECOM

Quality information

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Issue History

Issue	Issue date	Details	Authorized	Name	Position
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18. Forestry

18.1 Introduction

18.1.1 This chapter has been prepared by Bidwells. This chapter examines the potential effects, including cumulative effects, of the Proposed Development on forest and woodland areas during Pre-Construction and Enabling Works, Construction, and Operation. Where significant effects are anticipated during these phases, appropriate mitigation measures are proposed, and the significance of residual effects is assessed.

18.1.2 The assessment is supported by **Appendix 18.1: Woodland Report – Loch Ness** and **Appendix 18.2: Woodland Report – Glen Urquhart Wood (Volume 5: Appendices)**. These location-specific Woodland Reports provide details on forestry and woodland affected by the Proposed Development. They describe the current baseline conditions, including woodland type, species composition, condition, and existing management practices. Additionally, they outline future management proposals, referencing Land Management Plans (LMPs) or Long-Term Forest Plans (LTFPs) where available.

18.1.3 Most forest and woodland areas have an LMP or LTFP, which guides forest management over a 20-year period. The LTFP also provides forest owners with Scottish Forestry-approved consents for felling and replanting over a 10-year period. The Woodland Reports contain a detailed impact assessment of Pre-Construction and Enabling Works, Construction, and Operation of the Proposed Development. Future management proposals have been developed in collaboration with relevant landowners and forest managers to ensure a resilient and sustainable long-term forest management system. This assessment has been prepared by Bidwells Forestry in line with the UK Forestry Standard (UKFS) guidance. All staff contributing to this chapter have professional experience in undertaking forestry surveys and Environmental Impact Assessments (EIAs).

18.1.4 Throughout this assessment, areas of Semi-natural and Ancient Woodland are referred to as *woodland* and areas of predominately commercial species are referred to as *forests*.

18.1.5 As described within **Chapter 2 Project and Site Description** and summarised within **Chapter 3 Evolution of Design and Alternatives (Volume 2: Main Report)**, the Proposed Development presents two options, Option A and Option B. The differences between these options involve the location of the below ground works and the associated positioning of the Upper Control Works within the Headpond footprint. This assessment has considered both Options A and B; regardless of which option is taken forward, the conclusions of the Forestry assessment remain the same for both.

18.2 Scope of the Assessment

18.2.1 Secondary effects resulting from forestry activities, including effects on habitats and species, ornithology, hydrology and landscape and visual effects, are considered within their respective chapters of this EIA report and have therefore not been included within this chapter.

18.2.2 As described in **Chapter 4: Approach to EIA**, the Construction Phase is expected to represent the worst-case effects on forest and woodland areas. Given the anticipated 125-year operational lifespan of the project and the requirement for a detailed decommissioning plan at the end of its lifespan, a separate assessment of decommissioning effects is not included in this chapter.

18.3 Legislation, Policy and Guidance

18.3.1 Relevant legislation and guidance documents have been reviewed and considered as part of this forestry assessment. **Chapter 5: Planning Policy** sets out the planning policy framework that is relevant to the EIA report. This section considers the relevant aspects of the Highland-wide Local Development Plan 2012[1] , Planning Advice Notes and other relevant guidance, with the policies set out below.

[1] The Highland Council (2012). *Highland-wide Local Development Plan,* Online, available at: https://www.highland.gov.uk/info/178/development_plans/199/highland-wide_local_development_plan, [last accessed 02/04/25].

18.3.2 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, 2009
  - 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 Plan:
  - Highland-wide Local Development Plan (2012)
  - Highland Forest and Woodland Strategy, November 2018
  - Highland Biodiversity Action Plan (2015)

18.3.3 These documents and their relevance to this chapter are summarised below.

Policy Context

18.3.4 The intent of NPF4[2] , Policy 6 is to safeguard and expand forests, woodlands, and trees through Local Development Plans by identifying and protecting existing woodland while also recognising opportunities for enhancement and expansion. This policy aims to ensure sustainable land use and biodiversity conservation.

18.3.5 The 2018 Highland Forest and Woodland Strategy (HFWS)[3] supports this objective by promoting measures to prevent habitat fragmentation, enhance ecological connectivity, and strengthen nature networks. By prioritising these principles, the strategy contributes to the long-term resilience of woodland ecosystems, aligning with national goals for climate adaptation, biodiversity, and sustainable development. The 2018 HFWS updates the 2006 Strategy. It provides a regional expression of the national strategies described above for the protection and expansion of forest and woodland resources to deliver a range of sustainable development and benefits across the region. Although the HFWS focuses on woodland creation and expansion it recognises that remnant features of Ancient Woodland are irreplaceable and therefore endorses the protection and restoration of these habitats. Ancient and other native woodlands are valued not only for their distinctive biodiversity but also for their diversity of flora and soil structures which have developed over time and their potential to provide fragmented woodland habitat networks and ecological connectivity.

18.3.6 There is a strong presumption against woodland removal, woodland fragmentation, loss of Ancient Woodlands or adverse impact on the ecological condition of woodlands without appropriate mitigation measures being identified and implemented. 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.

18.3.7 The control of forestry felling is usually administered under the Forestry and Land Management (Scotland) Act 2018. Woodland removal, defined as "the permanent removal of woodland for the purposes of conversion to

[2] Scottish Government (2024). *National Planning Framework*, Online, available at: https://www.gov.scot/publications/national-planning-framework-4/pages/2/, [last accessed 02/04/25].

[3] The Highland Council (2018). Development Guidance, Online, available at: Development guidance - Forest and Woodland Strategy | The Highland Council (last accessed 02/04/25).

another land use" falls within the scope of Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017, except in cases when woodland removal is associated with development.

18.3.8 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.

Technical Guidance

18.3.9 The Management of Forestry Waste, Version 3 Management of Forestry Waste (SEPA)[4] and the supporting guidance Use of Trees Cleared to Facilitate Development on Afforested Land have been considered in relation to the Proposed Development Site.

18.3.10 Given that the Proposed Development would result in the permanent loss of woodland, the Applicant is committed to on-site compensatory planting equivalent to the area of woodland loss to meet the Scottish Government's CoWRP objective of no net loss of woodland. In addition to this, the Applicant is committed to planting an additional 677 hectares of woodland as part of the overall Compensatory Planting strategy, which will not only compensate for the woodland loss but also contribute to the enhancement of biodiversity, carbon sequestration, and overall environmental value. This planting area will exceed the area of woodland removed to ensure a net environmental gain **See Figure 18.3: Mitigation Plan (Volume 3: Figures)**.

18.4 Methodology

Extent of the Study Area

18.4.1 The Study Area encompasses the area over which all desk-based and field data were gathered to inform the assessment presented in this chapter. It has been limited to the woodland removal necessary for the safe construction and operation of the Proposed Development, as outlined in **Chapter 2: Project and Site Description (Volume 2: Main Report)**.

18.4.2 To support this assessment, Woodland Reports have been included **(Appendix 18.1: Woodland Report – Loch Ness and Appendix 18.2: Woodland Report – Glen Urquhart Wood)**, detailing the forest and woodland areas affected by the Proposed Development. These reports demonstrate how the Proposed Development would be incorporated into ongoing forest management activities.

Consultation Undertaken to Date

18.4.3 To inform the scope of the assessment for the Proposed Development, consultation was undertaken with statutory and non-statutory bodies. **Table 18-1 Consultation Responses** summarises the scoping and consultation responses relevant to the forestry assessment and provides information on where and/or how points raised have been addressed in this assessment.

18.4.4 Full details on the consultation responses and scoping opinion can be reviewed in **Appendix 4.2: Scoping Opinion** and **Appendix 4.3: Consultation Tracker (Volume 5: Appendices)**.

Table 18-1 Consultation Responses

Consultee	Response	Action
Buglife Scotland	Direct habitat loss and indirect impacts such as fragmentation, changes in humidity and changes to vegetation, all have the potential to adversely affect the invertebrate assemblage. Therefore, surveys should be considered to ensure an adequate impact assessment can be made for terrestrial invertebrates.	The removal or loss of habitat will be addressed within **Chapter 7: Terrestrial Ecology (Volume 2: Main Report)**. **Appendix 18.1 Woodland Report - Loch Ness** and **18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices)** identifies the extent of felling, and any mitigation required to maintain the resilience of the woodland.
Glen Urquhart Community Council	There should be full surveys completed of all habitats, particularly rare and threatened habitats and include upper and lower plants, breeding birds, including migrating birds,	**Appendix 18.1 Woodland Report - Loch Ness** and **18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices)**

[4] SEPA (2017). Online, available at: forestry_waste_guidance_note.pdf (Last accessed 02/04/25)

Consultee	Response	Action
	and animals, including mammals, reptiles and amphibians. It should be established which species are present on site and their location before any application is submitted. Habitat enhancement and mitigation measures should be detailed along with any priority species within the Highland Nature Biodiversity Action Plan.	identifies the habitats present, the extent of felling, and any mitigation required to maintain the resilience of the woodland. **Chapter 7 Terrestrial Ecology** sets out the habitat and protected species surveys, **Chapter 8 Ornithology (Volume 2: Main Report)** sets out the ornithological surveys and **Appendix 6.4 Outline Landscape and Ecology Management Plan (Volume 5: Appendices)** addresses the habitat enhancement and mitigation measures for the Proposed Development.
NatureScot	We advise that the applicant provides sufficient information to enable an assessment of potential effects on the conservation objectives of the Urquhart Bay Woods SAC and to demonstrate whether it can be ascertained that there is no Adverse Effect on Site Integrity (AESI).	The potential impact on this habitat will be addressed within **Chapter 7: Terrestrial Ecology (Volume 2: Main Report). Appendix 7.2 . Statement to Inform HRA** addresses potential impacts on designated sites. **.**
Scottish Environmental Protection Agency (SEPA)	Ensure that any new planting proposals are in line with Briefing Note 18: Publication of GWDTE Practice Guide (forestry.gov.scot). If tree felling is proposed the submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.	All forestry operations will adhere to UK Forestry Standards (UKFS)[5] and Forest and Water Guidelines[6] and SEPA Forest Waste Guidance[7]. All felling operations are detailed in **Appendix 18.1 Woodland Report - Loch Ness** and **18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices).**

Method of Baseline Data Collation

Desk Study

18.4.5 A desk-based appraisal of Ordnance Survey (OS) mapping, aerial photography and review of web-based data provided by Scottish Forestry[8] identified the existing forest and woodland cover within the Study Area of the Proposed Development. 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 (Long Term Forest Plan) information.

Field Study

18.4.6 Forest walkover and mapping surveys were undertaken in December 2024, to confirm the extent of the woodland areas affected by the Proposed Development and to further assess the current woodland characteristics. Photographic records were taken to provide visual samples of the woodland types and are included in **Appendix 18.1 Woodland Report - Loch Ness** and **18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices)**.

18.4.7 The forest walkovers included the visual assessment of tree health, vigour, ground conditions and existing woodland stability. Observations were also made of potential woodland windfirm boundaries. The forest walkover surveys included consideration of ancillary infrastructure including forestry extraction routes as set out in **Chapter 2: Project and Site Description**.

Assessment of Effects

18.4.8 There are currently no published criteria, guidance or methodologies for the assessment of effects on forestry. The assessment reported in this chapter is therefore based upon the methodology set out in **Chapter 4: Approach to EIA (Volume 2: Main Report)**, which is based upon the requirements of the 2017 EIA Regulations.

18.4.9 This assessment is made based on professional judgement, with reference to:

[5] Forest Research (2023). Available at; The UK Forestry Standard
[6] Scottish Forestry. CONFOR (2023). Available at: know-the-rules-booklet-2nd-edition-jan-2023.pdf
[7] SEPA Management of Forest Waste (2017). Available at**:** https://www.sepa.org.uk/media/28957/forestry_waste_guidance_note.pdf
[8] Scottish Forestry Map Viewer. Available at: https://scottishforestry.maps.arcgis.com/apps/webappviewer/index.html?id=0d6125cfe892439ab0e5d0b74d9acc18

- 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.

18.4.10 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 Control of Woodland Removal Policy (CoWRP)[9]. As such, for the purposes of this assessment tree removal is to be considered as having an adverse effect. Further arboricultural works, such as crown reduction or limb removal to achieve the necessary safety clearance, removes the need for tree removal, thereby reducing the adverse effect on the woodland habitat.

Sensitivity /Importance of Receptors

18.4.11 Four categories of sensitivity / importance of a forest or woodland are defined in **Table 18-2 Sensitivity Criteria**.

Table 18-2 Sensitivity Criteria

Category	Description
High	Highly valued, subject of national designation e.g. Ancient Woodland Category 1a; 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, 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.

Magnitude of Effect

18.4.12 Criteria for assessing the magnitude of change to a forest or woodland is defined in **Table 18-3 Magnitude of Change Criteria**.

Table 18-3 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	No discernible change to the forest or woodland.

[9] 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

Significance of Effect

18.4.13 The sensitivity of the woodland (**Table 18-2 Sensitivity Criteria**) and magnitude of change criteria (**Table 18-3 Magnitude of Change Criteria**) are then used to inform a professional judgement on the likely significance of the effect. **Table 18-4 Matrix for Determining the Significance of Effects** provides a framework for reaching a judgement as to the significance of predicted effects. Any effects rated as Major or Moderate are considered Significant.

Table 18-4 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

Limitations to the Assessment

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

18.5 Baseline Conditions

Existing Baseline

18.5.1 The Study Area encompasses a small section of semi-natural woodland, ancient woodland, and commercial forest. According to the HFWS 2018, the Highland region's total woodland cover is approximately 310,000 hectares, representing 13% of the land area. Of this, 75% is coniferous woodland, primarily comprising Sitka spruce (27%), Scots pine (21%), and Lodgepole pine (19%). The native woodland area is recorded at 130,000 hectares, accounting for 37% of the total woodland area and 5% of the total land area. The main native woodland types include native pinewoods (43%), upland birchwoods (34%), and wet woodland (9%). Of this 130,000 hectares of native woodland, approximately 40,100 ha are classed as Ancient Woodland. The baseline characterisation identified two 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, these are included as **Appendix 18.1 Woodland Report - Loch Ness** and **18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices)**. The affected woodlands were visited and existing data, sourced from the forest owner and their agents, were reviewed and confirmed against the woodland surveys.

18.5.2 The total areas of woodland habitats impacted within the Proposed Development, as shown in **Figures 18.1 Loch Ness Woodland Proposed Felling Requirements** and **Figure 18.2 Track Felling Requirements (Sheets 1-11) (Volume 3: Figures)** during the site surveys include:

- Commercial Woodland (8.32 ha);
- Native Broadleaved Woodland (and Semi natural Woodland) (1.78 ha); and
- Native Broadleaves Woodland (Ancient Woodland 1a) 0.78 ha.

18.5.3 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 Semi-natural Woodland, including Ancient Woodland present within the vicinity of the Proposed Development Site, and these are considered in this assessment to be of high sensitivity.

18.5.4 Of the native broadleaved woodland areas identified, 0.78 ha of these areas are recorded on the Scottish Government's Ancient Woodland Inventory (AWI)[10], as shown within **Appendix 18.1: Woodland Report – Loch Ness and 18.2: Woodland Report - Glen Urquhart Wood (Volume 5: Appendices)**. However, due to extensive historical commercial forestry operations within Glen Urquhart Wood, there are no remnant features present that would typically characterise Ancient Woodland. The long-term impact of commercial planting has significantly altered the original woodland structure and composition in this area.

18.5.5 NatureScot's Ancient Woodland Inventory[11] 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.

Future Baseline

18.5.6 Under the future "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. It is assumed that the Semi-natural Woodland 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.

18.6 Embedded Mitigation

18.6.1 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

18.6.2 The site selection process for the Proposed Development has taken into consideration effects on forestry and woodland, and for 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. For example, the Temporary Workers Accommodation compound was relocated and resized following a review of the requirements in amenities, and to avoid areas of existing woodland. This process is detailed in **Chapter 3: Evolution of Design and Alternatives (Volume 2: Main Report)**.

Good Practice

18.6.3 There will be a contractual requirement for the Construction Contractor to fully implement a comprehensive and site-specific Construction Environmental Management Plan (CEMP). This document will detail how the Construction Contractor will manage all works in accordance with all commitments and mitigation detailed in the EIA report, the Pollution Prevention Plans (PPs), statutory consents and authorisations, and industry good practice and guidance, including pollution prevention guidance. An outline CEMP, including an Outline Pollution Prevention Plan is provided in **Appendix 3.1: Outline Construction Environmental Management Plan (Volume 5: Appendices)**.

[10] Available via - https://www.data.gov.uk/dataset/c2f57ed9-5601-4864-af5f-a6e73e977f54/ancient-woodland-inventory-scotland - accessed 15/12/24
[11] A guide to understanding the Scottish Ancient Woodland Inventory (AWI) | NatureScot

18.6.4 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[12] e.g. to ensure protection and enhancement of the water environment;
- management of forestry waste (SEPA)[13] 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.

18.7 Potential Effects

18.7.1 This section considers the potential impacts and associated effect significance of the Pre-Construction and Enabling Works, Construction and Operation of the Proposed Development based on the activities described in **Chapter 2: Project and Site Description**. **Table 18-5: Woodland Areas impacted by stage** provides a breakdown of the woodland areas affected at each stage of the Proposed Development. The total area of forest and woodland impacted is 10.69 ha is broken down as shown in the table below.

Table 18-5 Woodland Areas impacted by stage

Pre-Construction and Enabling

Woodland Type	Designation	Area (ha)
Commercial	AWI	4.83
	LEPO	1.97
	NONE	1.52
SUB-TOTAL		**8.32**
Native	AWI	0.03
	NONE	1.27
SUB-TOTAL		**1.30**
TOTAL		**9.63**

Construction and Operation

Woodland Type	Designation	Area (ha)
Native	AWI	0.76
	NONE	0.51
TOTAL		**1.27**

Pre-Construction and Enabling Works Effects

18.7.2 The direct and gross loss of woodland from Pre-Construction and Enabling Works of the Proposed Development is 9.63 ha comprised of Commercial Woodland; 8.32, Semi-natural Woodland, 1.27 ha; and 0.03 ha of Ancient Woodland 1a.

18.7.3 The sensitivity of Commercial Woodland within the Study Area is assessed as low due to its common occurrence in the local landscape. Additionally, the woodland is considered to have a potential tolerance for visible alterations. The combined and direct loss of 8.32 ha of Commercial Woodland is assessed as a low magnitude of change, in the context of a noticeable change over a limited area, equating to a 0.009% impact of woodland removal within the regional resource forest area of 91,225 ha. This effect is assessed as **Negligible**.

[12] Confederation of Forest Industries (UK) Ltd. Guidance documents. Available at: https://www.confor.org.uk/resources/forestry-water-scotland/guidance-documents/

[13] SEPA (2017) *Management of Forestry Waste*. Available at: https://www.sepa.org.uk/media/28957/forestry_waste_guidance_note.pdf

18.7.4 The sensitivity of Ancient Woodland (0.03 ha) within this assessment is classified as high. This classification is based on several factors: the woodland is highly valued, subject of national designation e.g. Ancient Woodland Category 1a, the woodland holds particular value at the local level, contributing to community identity and ecological diversity; it is considered rare or distinctive within the regional context, thereby enhancing its importance within the landscape; and it demonstrates a capacity to tolerate moderate levels of change without significant degradation to its ecological functions or visual character. The magnitude of change is considered medium as while the affected 0.03 ha of Ancient Woodland is of high sensitivity, the actual area of loss is relatively small in scale. However, the loss is still permanent and irreplaceable, meaning it contributes to a significant overall impact/and as such the effect is assessed as **Major Adverse and Significant**.

18.7.5 The sensitivity of Semi-natural Woodland (1.27 ha) within this assessment is classified as medium. This classification is based on several factors: the woodland holds particular value at the local level, contributing to community identity and ecological diversity; it is considered rare or distinctive within the regional context, thereby enhancing its importance within the landscape; and it demonstrates a capacity to tolerate moderate levels of change without significant degradation to its ecological functions or visual character. The magnitude of change is considered medium. The magnitude of change for the 1.27 ha of Semi-natural Woodland is classified as medium because, while the woodland holds local ecological and community value, the level of impact is moderate rather than severe and as such the effect is assessed as **Moderate Adverse** and **Significant**.

Pre-Construction and Enabling Effects - Windthrow

18.7.6 The tree felling required through areas of mature Commercial Woodland to create the Proposed Development may result in an indirect effect of increasing potentially unstable forest edges where retained trees stand immediately adjacent to the Proposed Development. 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 windthrow is that these brown edge trees would be damaged and blown over due to the lack of shelter.

18.7.7 The existing plantation of Commercial Woodland will not be at an increased risk of windthrow due to the small areas of felling required, age and characteristics of the trees. Younger stands are generally less susceptible to wind damage, as their smaller canopies and shorter heights reduce wind loads on individual trees, making them more resilient to high winds. Furthermore, young trees have flexible trunks and root systems, which enable them to bend rather than break under pressure. The dense planting within this stand also provides mutual structural support, with each tree helping to buffer its neighbours from direct wind exposure. Since these trees have not yet undergone thinning, the collective stability of the stand remains high, and windthrow risk is minimised. Consequently, the identified area of Commercial Woodland is assessed to remain at low risk of windthrow. The sensitivity of Commercial Woodland within the Study Area is low. The magnitude of impact would be low, and therefore this additional area is assessed as **Negligible**.

Construction Effects

18.7.8 The combined and direct loss of native woodland due to construction of the Proposed Development would be a total of 1.27 ha comprised of 0.51 ha of Semi-natural Woodland (mixed native broad-leaved woodland), and 0.76 ha of Ancient Woodland(1a).

18.7.9 The sensitivity of Ancient Woodland within this assessment is classified as high. This classification is based on several factors: the woodland is highly valued, subject of national designation e.g. Ancient Woodland Category 1a, the woodland holds particular value at the local level, contributing to community identity and ecological diversity; it is considered rare or distinctive within the regional context, thereby enhancing its importance within the landscape; and it demonstrates a capacity to tolerate moderate levels of change without significant degradation to its ecological functions or visual character. The magnitude of change is considered medium. The magnitude of change is classified as medium in this context because, while the loss of 0.76 ha of Ancient Woodland is significant, the overall impact is moderate in terms of its scale and extent relative to the broader landscape and ecosystem, as such the effect is assessed as **Major Adverse** and **Significant**.

18.7.10 The sensitivity of Semi-natural Woodland (0.51 ha) within this assessment is classified as medium. This classification is based on several factors: the woodland holds particular value at the local level, contributing to community identity and ecological diversity; it is considered rare or distinctive within the regional context, thereby enhancing its importance within the landscape; and it demonstrates a capacity to tolerate moderate levels of change without significant degradation to its ecological functions or visual character. The magnitude of change is considered medium. Overall, the medium magnitude of change reflects that, although the loss is important in

terms of local ecological and community value, the scale of the loss is not large enough to result in a more severe or high-magnitude impact and as such the effect is assessed as **Moderate Adverse** and **Significant**.

Operational Effects

18.7.11 The direct operational effects on forests and woodland associated with the Proposed Development would be limited to periodic vegetation management as part of the wider maintenance of the Proposed Development. Following the construction of the Proposed Development, there would be an ongoing need to manage the growth of vegetation to facilitate access for maintenance after woodland removal, which 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**.

Operational Effects - Effects on Forest Management Systems

18.7.12 The introduction of the Proposed Development within areas of managed forest would require a review by landowners of the existing management system. Most large 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 LTFP's having to be revised to address the construction of the Proposed Development and the associated tree clearance works on the future management of woodland. In the absence of mitigation, the requirement for forest owners to revisit their LTFP to incorporate the existence of the Proposed Development could be considered to 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 Proposed Development and potentially additional felling to avoid wind throw could be, locally or for the individual landowner, of high magnitude and thus the effect is **Minor Adverse** and **Not Significant**.

Mitigation During Pre-Construction and Enabling Works

18.7.13 The Applicant proposes to 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.

18.7.14 To address the likely significant effect predicted for forest land-use management in the absence of mitigation (as discussed in **Section 18.8 Potential Effects)**, the Applicant has committed to implementing the mitigation measures identified within the Woodland Report for the forestry and woodland interests. The Woodland Report, included within **Appendix 18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices)**, identifies all areas of felling required to form the Proposed Development and access tracks.

18.7.15 The Woodland Report also includes, but is not limited to, the development of a forest landscape design following good practice as defined by Forestry Commission (now Scottish Forestry) Guidance (2014)[14]. The delivery of the felling identified in the Woodland Report 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 Report 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.

Mitigation During Construction

18.7.16 The Applicant will continue implementing standard good practice working methods to prevent significant effects on ecological and hydrological receptors throughout the Construction Phase. The mitigation measures outlined in the Woodland Report (**Appendix 18.1: Woodland report -Loch Ness Woodlands**) will guide woodland management activities during construction. This report details all necessary felling for the Proposed Development and access tracks, ensuring alignment with environmental commitments.

[14] 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

18.7.17 The Woodland Report also includes, but is not limited to, seeking to agree a forest landscape design following good practice as defined by Forestry Commission (Scottish Forestry) Guidance (2014)[15]. The delivery of the felling identified in the Woodland Report 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.

Mitigation During Operation

18.7.18 To mitigate the predicted likely significant effect on forest management systems for individual landowners, the Applicant has developed the Woodland Reports in conjunction with the relevant landowners and forest managers.

18.7.19 Given that the Proposed Development would result in the permanent loss of woodland, the Applicant is committed to making arrangements to plant on-site the equivalent area of woodland as Compensatory Planting, meeting the Scottish Government's CoWRP objective of no net loss of woodland. Where woodland removal is justified, the Compensatory Planting area will exceed the area of woodland removed to adequately compensate for the loss of environmental value, ensuring a net environmental gain (see **Figure 18.3: Mitigation Plan (Volume 3: Figures)**. Further details on the wider landscape and ecology mitigation can be found within **Appendix 6.4 Outline Landscape and Ecology Management Plan (Volume 5: Appendices**). In addition, the oCEMP **(Appendix 3.1 Outline Construction Environmental Management Plan)(Volume 5: Appendices)** will be a condition to the Application consent and updated post-consent on the appointment of the Construction Contractor and in consultation with The Highland Council (THC) and other relevant consultees. Throughout the Construction of the Proposed Development, the CEMP will remain a live document which is updated as circumstances, policies and best working practices change.

18.7.20 Details of the proposed mitigation is provided in **Table 18-7 Proposed Mitigation Measures** below.

Table 18-6 Proposed Mitigation Measures

Reference	Description
FO1	There will be a contractual management requirement for the Construction Contractor to implement a comprehensive and site-specific CEMP. This will detail how the Construction Contractor will manage all works in accordance with all commitments and mitigation detailed in the EIA report, the Applicant's SPPs, statutory consents and authorisations, and industry good practice and guidance, including pollution prevention guidance. 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 e.g. to ensure protection and enhancement of the water environment; • management of forestry waste (SEPA) 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.
FO2	Woodland Reports (**Appendices 18.1 and 18.2**) have been created as mitigation for the following: • to address the likely significant effect predicted for forest land-use management during Construction and Operation; and • reduce the risk of future windthrow by identifying felling to stable forest edges outside the Proposed Development.
FO3	A Compensatory Planting Management Plan has been created to ensure forest and woodland lost through felling is replaced. This will be delivered on-site. **(Figure 18.3: Mitigation Plan)(Volume 3: Figures)**.

18.8 Compensatory Planting

18.8.1 The compensatory planting plan for the Proposed Development involves the creation of over **674 hectares** of new native woodland to mitigate the loss of woodland during the Pre-Construction and Enabling Works, Construction, and Operational Phases. This plan is designed to ensure compliance with the Scottish

[15] 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

Government's Control of Woodland Removal Policy, which mandates no net loss of woodland and seeks to enhance biodiversity, ecological connectivity, and landscape integration.

18.8.2 Objectives of the Compensatory Planting Plan are as follows:

- Mitigate woodland loss: Replanting over 674 ha of native woodland to offset the areas affected by the Proposed Development.
- Enhance biodiversity: Promote the regeneration of a diverse range of native species that contribute to local ecosystems and support a variety of wildlife.
- Improve ecological connectivity: Link existing woodland areas, improving corridors for wildlife movement and promoting ecosystem health.
- Support long-term sustainability: Ensure the success and longevity of the planted woodland through appropriate management and monitoring.

18.8.3 The new native woodland will be planted on carefully selected sites, primarily located in areas that are ecologically appropriate and where the new planting will have the maximum benefit for both the environment and the surrounding communities. The specific planting areas will be chosen in consultation with relevant stakeholders, including Scottish Forestry and landowners. The planting will be designed to enhance existing landscapes and biodiversity features in the surrounding areas. Long-term management and monitoring measures will include:

- Ongoing management: The newly planted woodland will be monitored and maintained for at least 20 years, with management activities including weed control, thinning, and replacement planting as necessary.
- Monitoring: The success of the compensatory planting will be assessed annually for the first five years, followed by monitoring every two years for the remainder of the 10-year period. Parameters such as tree survival rates, growth rates, and biodiversity will be monitored.

18.8.4 The compensatory planting plan for over 674 hectares of new native woodland is designed to effectively offset the loss of woodland during the Pre-construction, Construction, and Operational Phases of the Proposed Development. By implementing a diverse range of native species, ensuring long-term management and monitoring, and collaborating with stakeholders, the Applicant aims to create a sustainable, resilient woodland that will provide a wide range of environmental, ecological, and community benefits. This plan demonstrates the Applicant's commitment to mitigating the effects of the Proposed Development on woodland resources, in line with national policy objectives.

18.9 Residual Effects

18.9.1 This section considers the potential residual effects and associated effect significance of the Pre-Construction and Enabling Works, Construction and Operation of the Proposed Development, following the implementation of the mitigation measures proposed in **Section 18.8 Potential Effects** of this chapter.

Pre-Construction and Enabling Works Residual Effects

18.9.2 The potential to further reduce Pre-Construction and Enabling Works effects through good practice measures have been identified in the Woodland Reports (in relation to windthrow); 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.

18.9.3 The Applicant is committed to implementing on-site Compensatory Planting as discussed above to replace the equivalent area of woodland lost due to the Proposed Development. 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 (**See Figure 18.3 Mitigation Plan, Volume 3: Figures**).

18.9.4 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 compensatory planting will replace the equivalent area of woodland lost, ensuring no net loss of woodland in alignment with Scottish Government's Control of Woodland Removal Policy. These planting efforts will also enhance ecological connectivity and support broader biodiversity conservation within the region.

18.9.5 Although the Pre-construction and Enabling 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.

18.9.6 In conclusion, with the proposed mitigation and compensatory measures in place, the residual effects of the Proposed Development on woodland areas are assessed as **Negligible** and **Not Significant**, ensuring the sustainability of forest resources and compliance with relevant environmental policies.

Construction Residual Effects

18.9.7 The Applicant is committed to making arrangements to plant on-site the equivalent area of woodland as Compensatory Planting, meeting the Scottish Government's CoWRP objective of no net loss of woodland (see **Figure 18.3 Mitigation Plan)(Volume 3: Figures)**.

18.9.8 The potential to further mitigate construction-related effects through good practice measures has been identified in the Woodland Reports. However, as with the Pre-Construction and Enabling phase, the Applicant's ability to implement these measures is subject to agreements with landowners. The ongoing collaboration between the Applicant, landowners, and forestry managers will play a crucial role in determining the feasibility and timing of these mitigation measures. The Applicant will continue to explore options for optimising felling and restocking strategies in line with best forestry management practices to minimise residual construction effects.

18.9.9 The Applicant is committed to implementing Compensatory Planting on-site, ensuring the equivalent area of woodland lost is replaced. This aligns with the Scottish Government's Control of Woodland Removal Policy, which aims for no net loss of woodland. The **Mitigation Plan (Figure 18.3, Volume 3: Figures)** outlines the strategic planning of this planting, which will contribute to the long-term sustainability and ecological benefits of the woodland resource in the area.

18.9.10 While construction-related effects have been identified, the Woodland Reports suggest several good practice measures that can help mitigate these effects. However, similar to the Pre-construction and Enabling phase, the ability to fully implement these measures depends on agreements with landowners and the cooperation of external parties. The ongoing collaboration between the Applicant, landowners, and forestry managers is crucial for ensuring that the mitigation measures are feasible and effectively timed.

18.9.11 The Applicant is committed to continuing discussions to explore the best options for felling and restocking strategies, in line with best forestry management practices, to minimise the residual construction effects. With the implementation of the planned mitigation measures and cooperation from all parties involved, the residual construction effects on woodland resources are expected to be **Negligible** and **Not Significant**, ensuring compliance with environmental policies and the preservation of woodland health in the long term.

Operational Residual Effects

18.9.12 Current and future forest land-use management is likely to be affected by the introduction of the Proposed Development 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**.

18.9.13 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.

Summary of Residual Effects

18.9.14 In reviewing the potential for effect interactions, additional and in combination cumulative effects, no significant residual effects have been identified.

18.9.15 **Table 18-8 Summary of Residual Effects** provides a summary of the residual effects.

Table 18-7 Summary of Residual Effects

Receptor	Effect (Pre-Mitigation)	Mitigation Proposed	Residual Effect
Woodland removal (commercial conifer forest) during Pre-Construction and Enabling Works	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 on site as per Scottish Government's CoWRP.	Negligible and Not Significant.
Woodland removal (Semi-natural Woodland) during Pre- Construction and Enabling Works and Construction	Direct effect on Semi-natural Woodland. **Moderate Adverse** and **Significant**.	The Applicant would reduce the felling where possible and seek to retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and construction activities. Compensatory planting area will exceed the area of woodland removed to ensure a net environmental gain and adequately compensate for the loss of environmental value on site as per Scottish Government's CoWRP.	Minor Adverse and Not Significant
Woodland removal (Ancient Woodland 1a) during Pre-Construction and Enabling Works and Construction	Direct effect on Ancient Woodland. **Major Adverse** and **Significant**	The Applicant would reduce the felling where possible and seek to retain scrub / understorey layers in areas where existing tree cover does not breach safety clearances and construction activities. Compensatory planting area will exceed the area of woodland removed to ensure a net environmental gain and adequately compensate for the loss of environmental value on site as per Scottish Government's CoWRP.	**Moderate Adverse** and **Significant**.
Woodland removal (Operation)	Limited to periodic vegetation management to maintain the Proposed Development **Negligible**.	No mitigation is required.	Negligible and Not Significant.
Forest management	Indirect effect on woodland management through requirement to incorporate the Proposed Development into LTFP. **Minor Adverse** and **Significant**.	The Applicant has produced Woodland Reports to inform proposed revision to the relevant LTFP and facilitate agreement with the landowners.	Negligible and Not Significant.
Cumulative	No significant cumulative effects predicted.	No mitigation is required.	Negligible and Not Significant.

18.10 Cumulative Effects

18.10.1 There are no additional cumulative effects associated with the commercial forest or native woodland.

18.10.2 The cumulative projects shortlist was agreed with The Highland Council (**Chapter 4: Approach to EIA**). This has been reviewed in respect to forestry and woodland and the developments listed in **Table 18-6: Cumulative Projects,** have been assessed for cumulative effects. Other developments were scoped out of the cumulative assessment because there would be no requirement for removal of woodland/forestry.

Table 18-8 Cumulative Projects

Planning Application	Status	Development	Distance (km) and direction from the Site	Cumulative Effect
ECU00000728	Consented	Red John Pumped Hydro Scheme	16.5, north.	No cumulative effects
ECU00003398	Consultation	Loch Kemp Storage	8, south-east	No cumulative effects
ECU00005214	Pre-Application Complete	Cnoc Farasd Wind Farm	7, north.	No cumulative effects

18.10.3 Given the Scottish Government's policy on Woodland Removal, it can be assumed that there will be no residual loss of woodland associated with the Proposed Development or any of the surrounding developments. Under this policy, developers are required to undertake compensatory planting to offset any areas of woodland that are felled during construction. This ensures that the overall woodland resource is maintained or even enhanced over time, as the new planting will replenish the felled areas. As part of the Proposed Development, we are specifically committed to carrying out compensatory planting within the project area. This initiative will further ensure that any woodland loss resulting from the Proposed Development will be effectively replaced, in line with the required mitigation measures. The compensatory planting will not only offset the removal of woodland but will also contribute to the long-term sustainability and biodiversity of the area.

18.10.4 Because of these compensatory planting efforts, there will be no net loss of woodland in the area, and as a result, the cumulative effect of all projects, including the Proposed Development, is assessed as Negligible and Not Significant. This conclusion is based on the policy requirement for woodland replacement and the fact that the compensatory measures in place will prevent any lasting negative impact on woodland resources in the region.

18.11 Summary and Conclusions

18.11.1 This chapter reports upon the significance of the predicted residual effects from the Pre-Construction and Enabling Works, Construction and Operation of the Proposed Development on forest and woodland areas. The assessment is supported by **Appendix 18.1 Woodland Report - Loch Ness** and **Appendix 18.2: Woodland Report- Glen Urquhart Wood (Volume 5: Appendices)**, which are location specific Woodland Reports in relation to forestry and woodland that would be impacted 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.

18.11.2 The Proposed Development is predicted to result in the direct loss of 8.32 ha of Commercial Woodland, and 2.57 ha of Semi-natural Woodland including Ancient Woodland due to the construction of the Proposed Development.

18.11.3 The assessment has concluded that the removal of 2.57 ha of Semi-natural Woodland including 0.78 ha Ancient Woodland would result in a **Significant** adverse effect, despite potential opportunities to reduce the amount of felling, subject to further detailed design. There were **No Significant** effects predicted for the removal of the Commercial Woodland.

18.11.4 The Applicant is committed to making arrangements to plant on-site the equivalent area of woodland as Compensatory Planting, in line with the Scottish Government's CoWRP objective of achieving no net loss of woodland. In addition to this, the Applicant is committed to planting an additional 674 hectares of woodland as part of the overall Compensatory Planting strategy, which will not only compensate for the woodland loss but also contribute to the enhancement of biodiversity, carbon sequestration, and overall environmental value. This planting area will exceed the area of woodland removed to ensure a net environmental gain, see **Figure 18.3: Mitigation Plan (Volume 3: Figures)**.

18.11.5 **Table 18-9 Woodland Removal Impact of Infrastructure** summaries the net loss of woodland areas.

Table 18-9 Woodland Removal Impact of Infrastructure

Item	Area (ha)
Total Loss of Commercial Woodland Area	8.32

Item	Area (ha)
Total Loss of Native Woodland Area	1.78
Total Loss of Ancient Woodland Area	0.78
TOTAL LOSS	10.89
Total Direct* Compensatory Planting Area	10.89
Total Net Loss of Woodland Area	**0**

**Note that a total of 674 hectares of wider woodland Compensatory Planting is proposed.*

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