

## **Lochaline Community Forest – Community Asset Transfer Scheme**

### **Response to representations**

We would like to thank everyone who took the time to submit representations concerning the Lochaline Community Forest project proposal.

We acknowledge the concerns related to private water supplies and appreciate the care that local neighbours and stakeholders have taken in raising these issues. We are committed to ensuring that the project proceeds in a way that carefully addresses these concerns, wherever possible.

We would like to address the specific concerns raised, and share what steps we have taken (or will be taking) to ensure the protection of private water supplies.

What we have done so far:

### **Feasibility Study**

When we originally commissioned the feasibility study, we specifically raised the issue of water supplies as one that needed addressing. We are aware that given how much is covered in the study it has not gone far enough.

### **Selection of Site Area for Purchase**

Not all of the original study site is part of the proposed purchase area (please see the business plan). A large area to the east of the site has been excluded, partly because of concerns about the impact on water supply for two properties identified during the feasibility study. This area was also deemed not as suitable for woodland crofts or a local timber supply due to the age and condition of the forest.

### **Buffer Zones**

During the feasibility study, maps were revised to create buffer zones around water supplies and catchments.

### **Representation of the Steering Committee**

We have included one of the neighbouring households as representatives on the steering committee for the project.

### **Commissioned Hydrological Study**

We have now engaged an experienced and accredited hydrology consultancy to undertake an independent assessment of potential impacts on private water supplies arising from the proposed community asset transfer and the creation of woodland crofts (see brief, **Appendix A**).

The hydrologist's work will include:

- A desktop review of the site setting, topography, and characteristics of local private water supplies.
- Liaison with private water supply owners to agree access permissions, gather information, and arrange site meetings.
- Site visits with private water supply owners to confirm intake locations and catchments.
- An assessment of existing private water supplies (wells, aquifers, springs), their sources, capacity, and vulnerability.
- An assessment of the proposed source of supply for the woodland crofts, including how this relates to existing private and mains water supplies.
- Identification of potential risks such as contamination, over-abstraction, impacts from infrastructure (tracks, paths, drainage), land management, or soil disturbance.
- A report summarising findings, including any required mitigation measures to be incorporated into project design, boundary setting, management practices, and legal agreements where necessary.

The assessment will follow relevant guidance, including that issued by the Drinking Water Quality Regulator (DWQR) for Scotland, and will be informed by both technical analysis and consultation with local knowledge holders.

The report will be produced following a site visit (anticipated in late October), with findings delivered within two weeks. These will be shared with relevant stakeholders and will directly inform the development and design of the project to ensure that private water supplies are fully protected.

### **Discussions with Lochaline Quartz Sand Limited (LQS)**

We have had helpful discussions with LQS regarding their existing mineral lease area within the Lochaline Community Forest, rights over mineral extraction, rights for surface access, rights to sink shafts and boreholes for testing, and rights to extract water, as outlined in their representation. These discussions have helped us to better understand the scope of the mineral lease and the potential for future water extraction.

### **What we will do moving forward**

To ensure that the concerns outlined in the representations are fully addressed, we plan the following:

**Independent and transparent reporting:** The hydrological assessment will be made available to affected parties for review. Where required, we may commission further specialist input (e.g. from environmental protection / regulatory bodies) to validate findings.

**Boundary and buffer zones:** If the assessments indicate that a larger separation between woodland crofts or other development and water supply sources is needed, we are willing to adjust boundaries accordingly, establish buffer zones, or exclude sensitive areas from development.

**Legal protections:** We will ensure that any commitments on water quality, quantity, no additional extraction, no contamination are enshrined in legal documentation (servitudes, title deeds, obligations) so that they are enforceable.

**Long-term management plan:** As the project develops, we will prepare a detailed woodland management plan that includes water protection as a core component. This will cover operations, maintenance, management, fencing, pathways, access, drainage, and emergency response for accidental pollution. Our firm belief is that moving to continuous cover woodland will be beneficial to the water table and local supplies throughout the site.

**Engagement throughout:** We recognise the value of ongoing engagement. We will continue to consult with neighbouring landowners, private water supply owners, LQS, and community stakeholders to ensure that concerns are identified early and addressed as part of the design and implementation of the project.

We understand the concerns around the proximity of the woodland crofts, risk of pollution, water supply depletion, and the legal rights to water and access. We are taking these issues seriously. The pending hydrological assessment, combined with legal safeguards and design mitigation, aim to ensure that the project will not adversely impact private water supplies, now or in the future.

It will be imperative that we include your knowledge and expertise in the process, to make sure the assessment is accurate and comprehensive. We will be in touch with each representative individually to arrange the next step in the assessment.

Yours sincerely,

Morvern Community Woodlands

## **Appendix A – Brief for Hydrological Assessment**

Lochaline Community Forest – Woodland Crofts

**Client:** Morvern Community Woodlands (MCW)

### **Purpose of the Assessment**

The aim of this study is to assess the potential impacts of the proposed woodland crofts within Lochaline Community Forest on existing water resources, and to determine the feasibility and sustainability of water supplies for the crofts themselves.

The assessment must distinguish between:

1. Existing private water supplies (PWS) used by neighbouring households.
2. Potential croft water supplies for croft activities
3. Potential water supplies for future croft houses.

The findings will inform project design, boundary setting, legal agreements, and long-term management, ensuring that private water supplies are protected and that any proposed croft water use is sustainable.

### **Key Questions to Address**

#### **1. Baseline Resource Assessment**

- What water resources exist within the site (springs, wells, aquifers, burns, boreholes, mains infrastructure)?
- What is currently being used, by whom, and how?
- What surplus or unused water sources exist (e.g. larger burn running through the site)?

#### **2. Private Water Supplies (PWS)**

- Confirm existing maps of all PWS linked to the site (six households confirmed to derive supply from the catchment).
- Confirm intake locations, catchment areas, and current abstraction levels.
- Assess vulnerability to contamination, over-abstraction, and drought.
- Clarify any legal arrangements (lease agreements, title deeds, servitudes) between Forestry & Land Scotland (FLS) and PWS owners.
- Identify whether croft water use could lawfully or practically occur downstream of these intakes.

#### **3. Proposed Croft Water Needs**

- Estimate water requirements for crofting activities (horticulture, small-scale processing, etc.) and for future croft houses.
- Assess whether these needs can be met from surplus water within the catchment.

- Consider the feasibility of different options (PWS expansion, new borehole, mains connection, abstraction from burn).
- Distinguish clearly between household/domestic supply vs. croft/land use supply.

#### **4. Mains Water**

- Review the feasibility of mains water connection, including current infrastructure and known issues and any impact this may have on other properties.
- Refer to Feasibility Study Section 4.12 (p.27) and p.39, noting that supply has not yet been adopted by Scottish Water.
- Consider issues of pressure and long-term reliability.
- Incorporate the note from p.48 that future supply may need to connect nearer to Lochaline rather than relying on the Ardtornish system.

#### **5. Risk Assessment and Mitigation**

- Identify risks of contamination or over-abstraction from proposed crofting activities, infrastructure, or land management (e.g. soil disturbance, track building).
- Assess precedence in drought conditions (i.e. how private supplies would be prioritised versus new croft demands).
- Recommend mitigation measures (buffer zones, alternative sources, storage, treatment).

### **Methodology**

**Desktop Review:** Site setting, hydrology/hydrogeology, topography, and existing supply data (including Feasibility Study, GIS outputs, and supplied maps).

**Consultation:** Liaison with all six household supply owners to gather information. MCW will provide contact details and assist in arranging a single site.

**Site Visit:** Walkover survey with supply owners and (optionally) MCW representative to confirm intakes, catchments, and supply arrangements.

**Analysis:** Evaluation of capacity, risks, and feasibility of supplying crofts alongside protection of existing PWS.

**Report:** A clear, concise written report summarising findings, risks, and mitigation recommendations.

### **Deliverables**

A report including:

- Map of existing PWS locations and catchments.
- Assessment of existing use, surplus capacity, and drought vulnerability.

- Feasibility of water supply for crofts (including distinction between croft/domestic needs).
- Assessment of mains water and borehole options.
- Mitigation recommendations and proposed safeguards.

Recommendations suitable for incorporation into:

- Project design and croft allocation.
- Boundary setting and buffer zones.
- Management and operational practices.
- Legal agreements/servitudes to protect PWS owners.

### **Timescale**

- Site visit planned for late October (subject to consultant availability).
- Draft report within two weeks of site visit.

### **Supporting Information Provided by Client**

- Feasibility Study, including water supply references (esp. Section 4.12, Table p.39, p.48).
- Contact list for PWS users.
- Maps showing catchment area and known supply locations (Map 8, p.26 of Feasibility Study; Tobar An Easbuig and Achabeag supplies noted).
- Any available GIS outputs.