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Our ref: PF 238/0607 (CNS/SEA/Scoping reports0607)

14 February 2007

Dear Mr Esson

Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004
Perth and Kinross Structure Plan Alteration No. 1 Indicative Forestry Strategy – Scoping Report

I refer to your scoping report, sent to the Scottish Executive SEA Gateway on 12 January 2007. In accordance with Regulation 17 of the Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004, Scottish Natural Heritage has considered the report in its role as a Consultation Authority under the above Regulations. Our comments on the scope and level of detail to be included in the environmental report and on the duration of the proposed consultation period are set out below. Detailed comments are provided in the annex to this letter.

Scope of assessment and level of detail

Subject to the specific comments set out below and in the annex to this letter, SNH is content with the scope and level of detail proposed for the environmental report.

Consultation period for the environmental report

Although the indicative timetable provided (page 12) is helpful, the consultation period for consultation on the environmental report is not specifically stated. We would request that a period of 8 weeks is allowed for consultation on the Environmental Report.

Concluding remarks

I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Regulations 2004 and our

role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the environmental report and on the Strategy.

Yours sincerely

Denise Reed (Mrs)
Operational manager

Enc. Annex – SNH response to Perth and Kinross Structure Plan Alteration No. 1
Indicative Forestry Strategy – SEA Scoping Report PF 238/0607

cc SNH SEA Gateway: sea.gateway@snh.gov.uk
SEPA SEA Gateway: sea.gateway@sepa.org.uk
HS SEA Gateway: hssea.gateway@scotland.gsi.gov.uk

Annex – SNH response to Perth and Kinross Structure Plan Alteration No. 1 Indicative Forestry Strategy – SEA Scoping Report PF 238/0607

General Approach

We support the general approach outlined in the scoping report (section 1).

Relationships with other plans

The scoping report provides a comprehensive list of other plans, programmes or strategies which may inter-relate with the IFS and proposes a mechanism to assess their compatibility. We recommend that the categories of plans listed under international/regional/national are reorganised e.g. The Land Reform Act is under the 'regional' heading but applies Scotland wide.

You may also wish to consider the following additional PPS and whether they need to be included in the ER:

National

SPP7 'Planning and Flooding'; The scoping report refers to the role of forestry in flood risk, for example on page 11 (increasing the role of woodland and forestry in mitigating flood events) and page 19 (para 5.37) in relation to slowing run off response times as part of flood management.

PAN 60 'Planning for Natural Heritage' includes reference to the importance of green space, green networks and urban forestry strategies.

SNH's Species Action Framework has just been published and provides a list of 32 species for national priority action over the next 5 years, including key species associated with woodland habitats such as capercaillie and black grouse.

Identification of priority woodlands for red squirrel conservation in North and Central Scotland: a preliminary approach. Poulson, L., Griffiths, M., Broome, A. & Mayle, B. (2005).

We welcome the reference to SNH's Natural Heritage Futures "Forests and Woodlands" and suggest consideration of the local prospectuses covering the area e.g. 'Loch Lomond, The Trossachs and Breadalbane' and 'Eastern Lowlands.'

Loch Tummel NSA Landscape Character Assessment (March 1999), by LUC.

Forest Habitat Networks (FHN). Finally, we recommend that cognisance is taken of the FHN publications. The FHN concept aims to overcome the fragmentation and isolation of woodlands which are characteristic of the Scottish landscape. We refer to the national and regional reports:

- A Forest Habitat Network for Scotland" 1995 (Peterken, Baldock and Hampson) (SNH research report no. 44).
- The Angus Glens and North East Perthshire (FC/SNH 2004),
- The Potential for Forest Habitat Networks in the Eastern Lowlands" (2004)
- Highland Perthshire Forest Habitat Network" (2003)

Baseline information

We note the difficulty in producing a full description of the baseline information at this stage. The baseline information should particularly focus on the state of the current environment that may potentially be affected by the IFS. It would be helpful if issues which have been scoped out are also made explicit at this stage.

We would like to suggest the following in relation to baseline data:

Biodiversity, flora and fauna:

This section would benefit from some re-ordering to reflect the hierarchy of international, national and regional designations. SSSI site management statements provide information about the priorities for managing existing woodland SSSIs.

Effects on Natura sites/species: The European Guidance (available at: http://europa.eu.int/comm/environment/eia/030923_sea_guidance.pdf) notes that any effects on protected sites and on selected species in accordance with the Habitats Directive should be part of the environmental report. The guidance recommends that these effects might be described in a separate chapter as the findings on such effects are binding for the decision of the competent authorities on the plan or programme.

Natural heritage outwith designated sites: please note that species listed on Annex 4 of the Habitats Directive and all birds are given some level of protection. We recommend specific reference to European Protected Species (such as otters, slender naiad, bats and wild cat.), to maintaining links between features I(n accordance with Article 10 of the Habitats Directive) and to national and local BAP species and habitats such as red squirrels, badgers, capercaillie and black grouse.

We also recommend that reference is made to the Scottish Biodiversity List (as described in Section 2(4) of the Nature Conservation (Scotland) Act 2004) and to the statutory duty on all public bodies to further the conservation of biodiversity.

SNH holds species data from national surveys. For example for otters, slender naiad, salmon, lamprey and freshwater pearl mussel, the latter of which might be useful in making some regional wide policy decisions about particularly sensitive parts of certain catchments. Sources of information for the above species are variable but the National Biodiversity Network is a possible source. We can advise on surveys undertaken in the area, such as badgers (Scottish badgers group – Forestry Commission) capercaillie (RSPB Inverness), and black grouse, (RSPB Perth).

The Forest Habitat Network study was undertaken to help Forestry Commission to map out forest habitat networks. The Core Path Plan which is currently in preparation will provide baseline information about key routes for access and recreation in Perth and Kinross.

Section 5.8; please note that a review of SSSI consents is underway rather than of SSSIs.

Landscape:

Section 5.20; we would like to understand how it is intended to review the Tayside Landscape Character Assessment and incorporate this as baseline information.

Section 5.21; we query the statement that a major element of long term landscape conservation must be nature conservation

Trends and environmental issues

Biodiversity, flora and fauna.

The area also has an unusually rich variety and extent of internationally and nationally important habitats and species. This value should be placed in the context of the national resource.

Section 5.28 states that baseline analysis shows that forest related biodiversity has been improving – can this be substantiated?

Section 5.30 – we suggest more emphasis is placed on enhancement as well as no loss of diversity or regional identity of specific habitats, species and associated landscapes. For example, consideration of the decline of woodland birds in the area, threats of alien species such as grey squirrels, and fragmentation of areas of native pinewood following long term decline.

We note the reference to integration of different approaches in section 5.30. The inter-relationships between different management strategies need to be considered, for example how management for black grouse dovetails with the red squirrel strategy.

There is also a need to consider the implications of landscape scale forestry management in relation to specific species such as black grouse and the way they are able can use/move within suitable habitat for example.

Degradation of existing habitat through grazing is a key issue, in particular in highland Perthshire. Many SSSI woodlands are in unfavourable condition due to grazing pressure, at least in part due to deer. There may be scope for further consideration of deer management in specific locations for example safeguarding existing new native pinewoods.

Population and human health

5.34 Accessibility to woodlands has been improved and encouraged over recent years for walking and cycling in particular, horse riding. The creation of core path networks is a relevant issue, and the issue of appropriate/responsible access.

Cultural heritage

We suggest that the cultural importance of the woodland resource in Perth and Kinross should be emphasised and placed in a national context. Loss of cultural diversity and sense of place can occur through generic planting regimes.

Landscape

Perth and Kinross is historically and culturally renowned for its forestry and woodland resource (such as iconic trees, designed landscapes and parkland), and woodland makes a key contribution to its scenic qualities. Perth and Kinross contains a high proportion of nationally important landscapes, There is a need to determine key characteristics of the landscape and how forestry may affect it; it is important to ensure development is appropriate in its siting and sympathetic integration into the landscape.

SEA objectives

Biodiversity:

Re. the criterion 'If seeking to increase woodland cover by broadleaf species..' we suggest that the reference to broadleaf species is deleted and the phrase 'native woodland' would suffice?

Re. "will the IFS (R) reflect the local importance of particular habitats and species, both rural and urban, as opposed to concentrating on protected species and habitats?" If it does, then this contradicts the hierarchy approach and we recommend international and national priorities are reflected first.

Population and human health: "Will the IFS promote access to woodlands....areas"; recommend insert 'appropriate' prior to 'access.'

Cultural heritage and landscape:

We recommend the insertion of objectives to increase the contribution of forests and trees to scenic qualities of the area, enhance local distinctiveness of the landscape and increase awareness and understanding of the cultural heritage of trees and the woodland landscape in Perth and Kinross

Indicators proposed

We agree that the indicators must be capable of being practicably monitored and realistic. Further investigation of the proposed indicators may be required to ascertain whether they can be applied to the IFS. We are unclear for example as to how certain indicators will be measured such as 'woodland structure and composition' (page 97).

'Number of woodland related UK BAP species...condition;" we welcome the reference to species here and suggest consideration is given to expansion of range/population of specific species indicators such as black grouse.

Cultural heritage and landscape; we suggest consideration is given to landscape indicators to reflect protection and enhancement of landscape character.

Alternatives

The Alternatives proposed seem useful and will be helpful in highlighting any environmental issues arising from each of the four scenarios.

Appropriate Assessment

We welcome the steps outlined for the Appropriate Assessment (AA). The Natura sites, the reason for their designation and comments on any likely effects of the plan should therefore be noted. In particular, it will need to be clearly stated where the plan would and would not be likely to have significant effects on any European site, and in the case of the latter, whether it has been ascertained that the plan will not adversely affect the integrity of any European site. Any potential threats / benefits of the Plan's activities to named species should also be noted. The AA should be signposted in the SEA Environmental Report so that it is clear which parts of the Report and the process are intended to form the AA

Further advice on integrating SEA and AA is available in the guidance published by the Environment Agency et al 'Strategic Environmental Assessment and Biodiversity: guidance for practitioners' available at:

www.englishnature.org.uk/pubs/publication/PDF/SEAbiodiversityguide.pdf.

Significance criteria (Appendix 5, pages 103-109)

Biodiversity, flora and fauna: We suggest the inclusion of significance criteria for relevant woodland species and European Protected Species would improve the focus of the IFS.