

Our ref: PCS/131415

Your ref:

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If telephoning ask for:  
Diarmuid O'Connor

10 March 2014

By email only to: [GCEsson@pkc.gov.uk](mailto:GCEsson@pkc.gov.uk)

Dear Sir

**Planning application:  
Draft Forest and Woodland Strategy  
Perth and Kinross**

Thank you for your consultation letter which SEPA received on 30 January 2014. We understand that the proposed Supplementary Guidance is being developed to support the Local Development Plan and will guide the future development of woodlands and forests in the Perth and Kinross Local Authority area.

**General Comments**

We support the multiple benefit approach within the strategy and believe that such an approach can potentially have positive environmental benefits for the identified natural local environment. A catchment approach to ensuring these multiple benefits are realised we believe should be developed when implementing the strategy.

However, we are not totally clear of the methodology that was employed to identify/guide the location of new woodlands as outlined in the strategy. While some Water Framework Directive (WFD) data is included in the Strategic Environmental Assessment (SEA) we are unclear how it contributed to the location methodology for identifying the preferred, potential and sensitive areas. It is not clear whether those water bodies that are less than good ecological status under WFD were identified?, what weight were diffuse pollution impacts or morphology impacts given? We are also unsure what consideration of wetlands protected under WFD has been taken account of in sensitivity analysis in the development of the strategy.

Furthermore, it is unclear how the guidance will inform development management decisions; the introductory text or indeed a separate section should be dedicated to how the guidance will inform future forestry development in the area.

We draw your attention to an 'opportunity mapping study for woodland creation to improve water quality and reduce flood risk in the Tay catchment – a pilot study for Scotland' (January 2013) which was led by Forest Research who are the research agency of the Forestry Commission. This is included as an attachment to this response and the study refers to the need for the findings to be incorporated into the Forest and Woodland Strategy. The findings of the study (if not already done

so) should be incorporated into the final strategy document and importantly within the associated opportunity and constraints mapping.

Comments on the SEA Environmental Report will be forwarded separately to you through the SEA gateway.

### **Specific Comments on the proposed Strategy**

- 1.1 Page 5: We would recommend that 'Theme 6 – environmental quality' text is expanded to include reference to not alone protecting the environment but also improving. Improving the quality of the environment and more especially the water environment accords with the protection and improvement objectives of the WFD. This is in keeping with your authorities duties as a responsible authority under the Water and Environment and Water Services (Scotland) Act 2003 to exercise your functions so as to secure compliance with the requirements of the WFD.
- 1.2 Page 21: 'Climate Change Adaptation' - we note that the strategy states that woodland can also help us adapt to a changing climate by helping us manage the water environment to reduce flooding. SEPA support the use of woodlands, and other land management measures, to help reduce flooding. Woodlands increase interception, evapotranspiration and reduce runoff which in some locations can result in a reduction in flooding downstream. It is important to note that current evidence suggests that the level of benefit is site dependent and frequently at the local scale (see Nutt, 2012 for a review of the literature<sup>1</sup>). Given this, it is preferable to target planting at those areas where it will have the greatest effect. We therefore recommend that opportunity mapping, such as SEPA's NFM maps ([http://www.sepa.org.uk/flooding/flood\\_maps.aspx](http://www.sepa.org.uk/flooding/flood_maps.aspx)) or the recent opportunity mapping of the Tay undertaken by Forest Research, be referenced.
- 1.3 Page 26: As per paragraph 1.1 above, we recommend that 'Theme 6' is expanded to include reference to improving as well as protecting environmental quality.
- 1.4 Page 30: Within 'Guiding the location of new woodlands' we welcome and support the aspiration that the strategy will help to set;
  - an approach of guiding forestry towards appropriate locations to minimise the likelihood of undesirable environmental or social outcomes
  - guiding strategic enhancement of ecosystem functions of forests to address flooding issues, soil stability, water quality and enhancing riparian habitats
  - the need for case by case analysis of where forestry is suitable as new woodlands are developed and existing blocks restructured.

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<sup>1</sup> Nutt, N. 2012. Flood Risk Management (Scotland) Act 2009. Methods to screen and quantify natural flood management effects. Report commissioned by SEPA and Forestry Commission Scotland, May 2012.



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Such a strategy can along with other potential benefits help protect and improve waterbody ecological status in line with the objectives of the river basin management plans. Heather comments welcome –

- 1.5 The SEA Environmental Report highlights the potential benefits to flooding of woodland creation (Appendix C). It should also be noted that any plans for woodland creation on flood plains should seek to avoid any adverse effects such as increasing flooding upstream or releasing large debris that may create obstructions downstream.
- 1.6 Page 31: While table 1, of page 31 outlines the different categories of woodland, the sentence also outlines that this is shown in Map\*, we were unable to find the relevant map, we are unsure if this as yet has been prepared.
- 1.7 Page 42 – Priority 4: Theme 6 – environmental quality. Stronger mention of the Water Framework Directive (WFD) and River Basin Management Plan (RBMP) objectives is required. We recommend that an extra bullet point is added which makes an explicit reference to achieving the objectives of protecting and enhancing ecological status of water bodies to achieve the aims of the River Basin Management Plans (RBMPs) under the WFD is required. Any future forestry development must seek to incorporate implementation of any measures identified by the River Basin Management Plan process for water bodies within the strategy area where forestry is a reason for a downgrade in ecological status. Such reference will require a greater commitment from any proposals to helping to protect and improve where possible the water environment.

The following table shows the waterbodies as far as we can gather from the strategy maps that accompany the strategy in the measures database which have forestry pressures against them. These should therefore be checked against those in the strategy and any forestry plans should aim to improve their ecological status by or before the WFD deadline through appropriate restructuring and planting in compliance with the above regulations. There maybe scope within the plan to explicitly identify that future forestry proposals adjacent to water bodies which are downgraded because of forestry sector issues should address these pressures through incorporation of mitigation measures from the RBMP into the development.

Waterbody ID	Waterbody name	Pressure	Fix date
6303	Kelty Burn	Morphology	2026
6405	Invergowrie Burn	Morphology	2020
6631	Abhainn Duibhe	Morphology	2012
100221	Loch Rannoch	Diffuse pollution – phosphorus	2026
100222	Dunalastair Water	Diffuse pollution – phosphorus	2026
100223	Loch Laidon	Diffuse pollution – phosphorus	2026
100233	Loch Tay	Diffuse pollution – phosphorus	2026



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- 1.8 Page 42: Along with a stronger mention of WFD and RBMP we recommend that the text should reflect more strongly the need to ensure that all forestry operations must comply with the forest and water guidelines and the relevant Water Environment Controlled Activities (Scotland) Regulations 2011 and the relevant General Binding Rules (GBRs) to protect and improve the water environment. Whether areas are identified as preferred or potential areas of forestry adherence to these regulations is a legal requirement to ensure protection of the water environment. Adherence to these guidelines/regulations should ensure that there is no deterioration to the receiving water bodies.
- 1.9 Page 42: We recommend that bullet point 2 is amended to read 'Collaborate with SEPA, Forestry Commission Scotland and private landowners through the Tay Area Advisory Group to deliver the objectives of improvement and no deterioration of the water environment as laid out in the River Basin Management Plan under the Water Framework Directive'.

## **Regulatory advice for the applicant**

### **2. Regulatory requirements**

- 2.1 Details of regulatory requirements and good practice advice for the authority can be found on our website at [www.sepa.org.uk/planning.aspx](http://www.sepa.org.uk/planning.aspx). If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at:

SEPA Perth, Strathearn House, Broxden Business Park, Lamberkine Drive, Perth, PH1 1RX, Tel: 01738-627989.

If you have any queries relating to this response, please contact me by telephone on 01698-839341 or e-mail at [planning.se@sepa.org.uk](mailto:planning.se@sepa.org.uk).

Yours faithfully

Diarmuid O'Connor  
Senior Planning Officer  
Planning Service



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