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Planning and Regeneration
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
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7 March 2014

Dear Sir

Perth and Kinross Forest and Woodland Strategy (draft) November 2013 - consultation

00815 Perth and Kinross Forest and Woodland Strategy - SEA Environmental Report

Please find our comments below on the draft Forest and Woodland Strategy for Perth and Kinross, and the associated SEA Environmental Report for the Strategy. Our detailed comments are contained in Annexes 1 and 2 respectively.

Forest and Woodland Strategy

We welcome the production of this Forest and Woodland consultation draft Strategy for Perth and Kinross.

We have made some detailed comments on the Vision and Priorities but overall we are content that they provide good direction and priorities for the Strategy. We also welcome the Themes which are consistent with the Scottish Forestry Strategy.

However, we feel the Strategy would benefit from some key changes and have summarised these below:

We understand the Strategy will provide Supplementary Guidance (SG) in relation to Policy NE2 (A) and (B) in the Perth and Kinross Local Development Plan (LDP). However, we have some concerns that in its current form it does not provide sufficient detail and explanation to fulfil some of the requirements of the SG. For example we are unclear as to how it will "inform Development Management decisions that include proposals for woodland removal and woodland creation (page 5 of the strategy)," or "identify trees and woodlands where nature conservation is of primary importance (page 41 of the LDP). This may be a case of including information which has already been collected but is not yet in the Strategy.

The Strategy would benefit from more specific proposals relevant to particular places, particularly in relation to the opportunities for action and maps. This would enable it to be more meaningful to Perth and Kinross. We have therefore made recommendations mainly in relation to the 'opportunities for action' aimed at making these more relevant to some key



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locations, such as the development expansion areas north and west of Perth and historic orchards. The production of an action plan to accompany the Strategy could also provide more locational guidance and actions.

We welcome the production of sensitivities, opportunities and overall strategy maps. However, we recommend these are revised as in their current format and scale we do not feel these maps are able to provide the level of locational guidance needed.

We are unclear as to how some of the maps have been compiled, and it would be helpful for the guidance to provide the data sources used to create these, including those cited in the map legend. This would enable us and other stakeholders to judge whether the Strategy is based on good evidence, and if required provide further advice on how closely the maps reflect its objectives.

We suggest the Strategy also cross references to (and aligns with) the proposed Green Infrastructure (GI), Placemaking and Landscape SG notes. For example the GI SG could play a key role in implementing this Strategy in terms of integrating and connecting woodland across north and west Perth. Many of the opportunities for action will also deliver across the themes and we recommend these multiple functions are recognised. For example riparian woodland does not only deliver climate change benefits but also biodiversity. Likewise, communities (Theme 4) can also input to economic development (Theme 3).

The map base for the 4 different categories including “Energy Forests” for woodland seems to be omitted (page 31), and we request the opportunity to comment on this when it is available.

SEA Environmental Report

We provided detailed comments at scoping stage, and thank you for incorporating our recommendations into the Report. We welcome the ER which is clearly structured and comprehensive. We consider that it has overall provided a satisfactory assessment of potential significant effects, and agree that the environmental effects will be mainly positive in nature. We are sometimes unclear as to how some of the map based assessments have been compiled, and recommend the data sources are provided to illustrate this.

The ER provides detailed mitigation and enhancement measures to address the potential adverse effects of the Strategy (Table 10.1). These are mostly directed to the Strategy itself and individual forest plans. However, it is not clear how these have been addressed in the Strategy and we recommend these measures are included. For example M7A “The FWS should promote the prioritising of those Woodland In and Around Towns schemes which give the greatest benefit in terms of connecting communities and biodiversity with the surrounding countryside.”

We have made some comments on the ‘assessment of the policy scenarios’ in relation to the catchments, particularly the planting of new woodland for flood alleviation and diffuse pollution, and potential impacts on waders.

Some information in the ER could usefully be used or cross referenced in the Strategy. For example you may wish to consider the environmental baseline information, environmental issues, and assessment of woodland capacity in individual catchments.

We would be pleased to discuss our comments further with you if that would be helpful. Please do contact Carolyn Deasley in the first instance on 01738 458583.

Yours faithfully

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Annex 1

Perth and Kinross Forest and Woodland Strategy (draft) November 2013 - consultation SNH's detailed comments - 7 March 2014

Purpose and scope (Part 2): Suggest the 'purpose and scope' list should also include: "Identify how and where trees and woodlands can contribute to making and shaping successful places, and the type of woodland which is most appropriate" and "Role in enhancing strategic green networks at a regional scale."

Woodlands and Forestry in Perth and Kinross today (Part 3)

We welcome this section as it provides important locational context. We recommend this is expanded to bring out the character of woodland and how this influences the types of landscape in the area, such as the character of Strathearn and the Carse of Gowrie. Information contained in SNH's Natural Heritage Futures documents (updated 2009) and the Tayside Landscape Character Assessment should help with this:

http://www.snh.gov.uk/about-snh/what-we-do/nhf/nhf-by-la/document/?category_code=NHF&topic_id=1436

<http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=310>

The SEA Environmental Report (ER) also provides sections on semi-natural woodland and woodland change (sections 2.9-2.12) and baseline environmental information/issues which could also be usefully included here. The rich heritage of iconic individual trees should also be mentioned.

Opportunities and challenges (page 21): we recommend adding the following:

Add 'Our woodland heritage: there is significant pressure on some of our most rich and ancient woodlands from development. These need to be preserved and enhanced as part of our most valuable heritage and biodiversity.'

Add 'Landscapes: there are opportunities to remove inappropriate historical forest planting and provide woodland which complements landscape character and enhances its quality.'

Add "Placemaking: trees and woodlands can make an important contribution to successful places. Incorporating trees and woodlands into new and existing places that link with existing habitat networks can provide a range of benefits for people and nature."

Protecting habitats at a landscape scale: Amend title to "Connecting and protecting habitats at a landscape scale" and the following sentence "need to be managed, conserved and enhanced at landscape as well as site scale in order to provide ecosystem connectivity."

Achieving the Vision (Part 4)

Vision statement: We support the vision of an area of exceptional trees, woods and forests which enhance the natural and cultural environment. However this doesn't capture contributions to flood alleviation and climate change, and providing a healthy place, although these are mentioned in the themes contributing to the vision. We suggest it is amended to reflect this.

'This is our vision..'

2nd para: "Many more people live and work in the countryside" – query as to whether this is consistent with the settlement strategy for TAYplan.

3rd para, 3rd sentence: amend to "These forests...green corridors, including hedgerows and trees. Rare species such as black grouse are returning, benefiting from careful management and more connected habitats."

We suggest an additional theme under the Priority "Maximising the role of forests and woodlands make to improve the residents of P&K quality of life": "Theme - placemaking - encourage trees and woodlands to be incorporated into new developments to provide a range of benefits to people and to link with and enhance existing habitat networks." This should link with the proposed Placemaking SG.

Geographic Priorities for Woodland and Forestry (Part 5)

It is important that the Strategy clearly explains the process by which the locational guidance for new woodlands is arrived at, so it can demonstrate that it is based on sound evidence. This currently is not clear. It would be helpful if you could provide Map 1 so we could provide further advice on the extent to which you have demonstrated a good evidence base for the Strategy.

Table 1 (page 30): We agree with the descriptions of the classes of land. However, the link between this table and the different categories of woodland is not clearly explained and seems to be incomplete. Please clarify. The map is also not provided to illustrate the 4 categories (page 31) and we would be pleased to comment on this when it is available.

Native woodlands (page 31): This section states that native woodlands contribute to integrated habitat networks but connectivity between other woodlands e.g. mixed or softwood could be important too.

"Energy forests" category (page 32): We will be pleased to comment on this once this category is shown on a map base. The term 'broadleaved coppicing' is referred to (page 21), but the term 'Short Rotation Coppice' is used thereafter – please clarify.

Short Rotation Forestry: carbon neutrality cannot be assumed, and the location and type of soil should be considered. Please see the Joint Research Centre's report on Forest Bioenergy:

http://iet.jrc.ec.europa.eu/bf-ca/sites/bf-ca/files/files/documents/eur25354en_online-final.pdf

Wood fuel from existing woodlands: the extraction of wood fuel from existing conifer plantations is not mentioned and we recommend its consideration as part of the key resource.

Priorities, Themes and Actions (Part 6)

Many of the 'Opportunities for Action' measures are generic and we recommend these are re-examined and tailored to the specific opportunities and pressures in Perth and Kinross over the next 20 years. For example, there are significant new development areas around Perth, and opportunities for green networks within and connecting these to existing green infrastructure.

Priority 1, Theme 1

Opportunities for action:

Encourage the management and expansion of riparian and floodplain woodland..” - recommend add ‘as part of a catchment approach’.

Add: Investigate the effects of climate change on species distribution (e.g. northerly retreat in P&K) and provide suitable woodland mixes for those species where intervention is required

Add: Pests and pathogens as a result of a changing climate affecting our native and plantation forestry. This will affect design and species composition and planting structure of woodlands. Encourage control of invasive non-native species.

Priority 2, Theme 2:

Opportunities for action:

Add “small scale high value in-wood use of an existing timber resource” (e.g. furniture making). There should be encouragement for a sustainable locally grown timber resource.

Priority 2, Theme 3:

Opportunities for action:

2nd bullet: Support for agro-forestry is welcome. The Strategy could encourage the integration of agriculture and forestry on a landscape scale and identify appropriate areas in Perth and Kinross where this could happen.

3rd bullet: ‘Carse of Gowrie Initiative’. Please clarify the nature of this initiative. Recommend mention of planting of new orchards and management/regeneration of existing historic orchards in the Carse of Gowrie and other locations.

4th bullet: Encourage forest based tourism.” Recommend provide examples and be more specific in terms of the type of tourism encouraged. Iconic trees in Perthshire such as the Fortingall Yew also provide tourism benefits.

Add new opportunities:

“Development of hedgerows as an environmental resource for farmers such as the Normandy woodfuel “Hedglink” project – please see appended report.

Encourage ‘woodland use’ hubs - people working in and adding value in forests and development of woodland use hubs e.g. in villages in Highland Perthshire such as Aberfeldy. Re-establishment of coppicing (e.g. hazel woods) and creation of new woodland coppice should also be encouraged.

Add indicator: no. of hectares of new orchard planting/restored orchards.

Priority 3, Theme 4:

Add opportunities for action: ‘Improve connectivity and functionality of woodlands through the mapping of a woodlands habitat network, and identification of opportunities for its enhancement.

Add: “Encourage and promote community involvement in community woodlands.”

Add: “Provide appropriate new tree and woodland within and around the PKC new strategic development areas and new infrastructure identified in the LDP including Bertha Park, Almond

Valley, Perth West and the Cross Tay Link Road, informed by green infrastructure planning, and placemaking principles. Ensure good management and protection of existing woodland.’ We recommend cross referencing to the proposed Supplementary Guidance on Green Infrastructure and Placemaking.

“Promote new street trees and urban tree planting as part of place improvement and development opportunities.”

Recommend adding an indicator to measure area of new woodland planting achieved as part of new development.

Priority 3, Theme 5:

Opportunities for action:

3rd bullet: After “Maintain Public Rights of way through woodland” add “and identify and support the development of new active travel routes through new and existing woodland where appropriate.”

Add: Encourage participation in woodland activities e.g. woodland management and new tree planting for exercise and well-being.

Priority 4, Theme 6:

Opportunities for action:

1st Bullet: Add to recognise that felling and planting in sensitive catchments (e.g. Lunan Lochs) is a key issue in Perth and Kinross, and that in these areas, there may be a need for a more targeted approach to protect water and soil resources rather than this standard approach. We suggest that sensitive catchment areas could also be usefully identified on the sensitivities map. Please also refer to our comments in the ER under mitigation M11C.

4th bullet: Change to “Protect unique local landscapes and safeguard sensitive landscapes, and ensure new woodland planting respects and enhances the qualities of Perth and Kinross’s landscape character and capacity. The LDP is preparing Supplementary Guidance on Landscape and we recommend a link to this here.

7th bullet: We recommend identifying areas for action in terms of cultural and historic landscapes such as mapping PKC’s historic orchard resource.

Indicators: Add the number of ha. of existing woodlands brought into management.

Priority 4 – Theme 7 – Biodiversity

Opportunities for action:

Add ‘Protect and restore existing areas of Ancient Woodland, and promote connectivity between Ancient Woodlands through new appropriate woodland planting.’ Perth and Kinross contains a high proportion of Ancient Woodland, which is an irreplaceable, nationally important resource. However, this Ancient Woodland resource is under increasing pressure from development in particular in Perth and Kinross. This should be explicitly recognised in the Strategy.

Add: Identify trees and woodlands where nature conservation is of primary importance Retention of long standing and mature trees and hedges should be prioritised.

Add: Safeguard and improve priority woodlands for red squirrel conservation and improve connectivity between these.

Add: Encourage new hedgerows and hedgerow trees to provide added biodiversity and improved habitat connectivity.

Add: Encourage the appropriate management and connectivity of existing and new forests for black grouse.

Add: Management of the high numbers of herbivores should be added as this could be a major constraint in delivering the objectives of the Strategy. This is an issue which the SEA ER also identified, and stated that “The FWS could give further consideration to deer management in specific locations...” (page 35 of the ER)

Add: Encourage new scrub woodland in upland areas such as dwarf willows, juniper, rowan, and aspen along burns to increase structural diversity.

The indicator to reflect loss of woodland (ancient/semi-natural/other) to development is welcomed.

Maps general:

The production of spatial maps showing sensitivities, opportunities and the overall strategy is welcomed. SEA baseline data may have been used to assemble the layers on these maps, but we do not understand the process of how these maps have been compiled. Please provide the data sources used to compile the maps (e.g. ‘bird habitats’ on the sensitivities map). We found that the use of only one colour is confusing in places, and suggest different colours are used to differentiate clearly between the layers. Likewise the dots used are very indicative at this strategic scale and unfortunately are not useful in providing geographic locational guidance. (For example, use of star symbol for ancient woodland in the opportunities map). We recommend the use of an O.S. base layer which will assist in providing this information.

Sensitivities map:

It is unclear from the maps where new woodland is proposed in upland areas. There are sensitivities regarding woodland planting in upland areas whilst ensuring sensitive upland bird breeding areas are safeguarded. The RSPB has been surveying marginal hill ground to identify important areas for waders and we recommend this dataset is included if not already. This may be the dataset provided in the SEA ER (Appendix B) as baseline information - “Farmland wader birds” - please clarify.

Open ground and upland areas can be important wildlife habitats and we recommend the Strategy both recognises this and provides the necessary safeguards to ensure the right types of planting is implemented in the most appropriate places.

Opportunities map:

Water management through planting: Are these areas identified to help provide water attenuation in catchments? Riparian woodland needs to be located with care as areas adjacent to watercourses can also be important areas for waders.

There is no clear differentiation in the map between areas of enhancing existing woodland and areas of proposed new woodland. These could be separated into 2 maps for clarity.

We suggest this Opportunities map also cross references to the Green Infrastructure SG, and shows indicative green infrastructure, consistent with TAYplan 2's emerging Main Issues Report (Main Issue 8: Planning for multi-functional green networks to be enhanced).

Strategy map:

As above, please explain how this map has been compiled.

Appendix 2:

00815 Perth and Kinross Forest and Woodland Strategy – SEA Environmental Report

SNH's detailed comments - 7 March 2014

Environmental Baseline and issues (section 3)

Relationship with other Plans, Programmes and Strategies (PPS)

The list of PPS in the ER and Appendix A is welcome and comprehensive and we have no further comments.

We are content with the key baseline facts for Perth and Kinross and the comprehensive baseline information provided in Appendix B.

Environmental issues in Perth and Kinross

Table 3.4 lists the environmental issues for each SEA topic. This section is quite generic and we suggest it is revised to include issues specific to Perth and Kinross where possible. We have made some recommendations below.

Biodiversity, flora and fauna: "Halt the on-going fragmentation/lack of connectivity of existing woodland areas." Thank you for including this in the ER; it would be helpful to explain how the FWS can help achieve this.

We support the reference to the Strategy's role in deer management and refer to our comments in the Strategy about this significant issue in Perth and Kinross.

3.55 Data Gaps and problems

In our scoping response we recommended recognition of lack of information on integrated habitat (woodland) networks. We are content with the Council's response that the FHN data is more relevant in this case.

Scoping of SEA environmental topics

We are content with the scoping in of the SEA topics.

SEA objectives and indicators (section 4)

At scoping stage, we recommended consideration of SNH's 'Natural Heritage Futures' forestry and woodland objectives and actions specifically for Perth and Kinross. The suggestion to incorporate the NWSS data into the FWS and environmental baseline is welcomed.

Section 4: This section is relevant and focussed on the issues in Perth and Kinross. We have no further recommendations in relation to the SEA objectives and indicators.

Assessment of Strategy Themes (Section 6):

We note that the first stage of the assessment uses a matrix approach to assess Opportunities for Action for each of the Strategy's 7 themes against the 15 SEA objectives (Section 6 and Appendix C). Appendix C provides a very comprehensive and transparent appraisal of potential impacts, and the summary of the assessment in Section 6 is welcomed.

We also welcome the mitigation and enhancement measures identified as part of this assessment.

Appendix C (C2) Riparian and floodplain woodland: While there can be flood attenuation benefits, this should note potential for adverse impacts on wader habitats. Survey and assessment of these areas is required to ascertain suitability of planting.

Knowledge of natural flood management is evolving, and we suggest that site specific solutions will need careful planning and modelling to ensure they have the desired outcomes. We also recommend recognition here that attenuation benefits will differ according to the type of land. For example, arable farmland will deliver greater attenuation benefits than permanent pasture.

Map based assessment (section 7)

This uses maps to represent the key spatial data/policies for each of the 7 key themes. For example 'biodiversity mapping features potential areas for native woodland expansion etc. (section 5.7/5.8).

The mapping approach is welcomed, along with the production of the comprehensive data to formulate these. However, we are sometimes unclear as to how maps have been compiled and seek further clarification on these. Please also explain how the data has been compiled for the elements in the legend, for example, figure 7.1 "most preferred energy woodlands" and "hydro community development areas," and figure 7.3 "priority areas for energy crops."

Assessment of policy scenarios (section 8)

The explanation of the assessment of 3 policy scenarios to assess potential environmental impacts of different levels of woodland creation is supported (section 5.9):

- 1) moderate (to 19% - a 12% increase on existing woodland levels),
- 2) national (to 25% - a 47% increase on existing woodland cover levels)
- 3) notional capacity of the WFD catchment areas within Perth and Kinross. We note that this uses a "disaggregated approach to test the upper threshold of potential for woodland expansion for each of the spatial framework zones defined by the landscape and environmental capacity of the inter-catchment."

We understand from para 8.13 that the upper threshold of the capacity based approach would increase woodland cover of land area to 50%, which is 30% over existing levels. However, this does not seem to equate with the calculations for Scenario 2.

The scenarios by catchment clearly illustrate their potential environmental implications, and the capacity of individual catchments to accommodate new woodland. This approach is welcomed given the significant environmental sensitivities of some catchments in Perth and Kinross, such as Loch Leven SPA and the River Tay SAC. We recommend specific mention of the Lunan Lochs catchment given its environmental sensitivities.

Scenario 3 – Notional capacity also provides useful discussion about the type and extent of sensitivities in relation to potential areas for woodland expansion.

Paras 8.6 and 8.8 state that for Scenarios 1 and 2 the additional woodland would be concentrated mainly in the lower lying areas of the River Tay catchment and the Earn catchment, with possibly the River Leven catchment to a lesser extent for scenario 2. However, we suggest these may be areas which are least likely to change to woodland because of their existing land use and location. It would be useful if the Strategy could explore these potential implementation issues.

In terms of reduction of diffuse pollution, we recommend the text states that the benefits lie in arable conversion to woodland, rather than the conversion of permanent pasture to woodland for example.

We welcome the acknowledgement in paras 8.10 and 8.28 about possible pressure on important bird habitats and Loch Leven. We refer to our request for clarification in the Strategy about the ornithological data available ('sensitive bird habitats and protected open ground habitats') to inform this, and will be pleased to comment further once this is available. We recommend revising the text in recognition that water quality in the catchment could in fact be detrimentally impacted if land use change from permanent pasture to forestry is proposed as associated ground preparation could result in a net increase in phosphorus. We suggest 8.29 second sentence is revised to state: "Opportunities exist *on intensively managed land* in the catchment to deliver benefits improving ..." adding recognition of implications in terms of increased sediment run-off as a result of forestry operations, for example with the potential to impact on Loch Leven SPA (para 8.29).

The conclusion (para 8.53) notes that that "the preferred scenario (2) mirrors the national aspiration of bringing Scotland closer to the European average of 25% woodland cover." We welcome the statement that this is possible without planting in sensitive areas. However, we note that much of this would be accommodated in the Tay and Earn catchments. We refer to our request above for a fuller explanation of the process followed and datasets used given environmental sensitivities, and the potential issues in relation to establishing new woodland in these areas.

Cumulative and synergistic effects (section 9)

Figure 9.2 is helpful in clarifying the sensitivities and opportunities in Perth and Kinross. These seem to include similar factors as those in the legend of the Strategy maps but 'existing native and protected woodland's seems to be missing from the 'sensitivity' Strategy map, and the legend differs for the 'opportunity' map. Please clarify.

Mitigation measures (section 10)

We welcome Table 10.1 which sets out a list of general and specific mitigation and enhancement measures to be applied. We note many of these are for the Strategy itself but these do not seem to have been incorporated into it; please clarify

M1C: "The FWS should promote the creation of floodplain woodlands offering a range of benefits to biodiversity...management" and M1E: we refer to our comments regarding important bird habitats in some floodplain areas and the need for case by case assessment.

M11C: This should also refer to the need for more rigorous controls in particularly environmentally sensitive catchments.

Monitoring proposals (section 11)

The use of the indicators with targets and limits to provide monitoring information is welcomed. However, we cannot find reference to the proposed monitoring framework referred to in para 11.2 and request this information.