

Protecting Scotland's wildlife for the future

Sound of Barra Consultation Responses
Scottish Natural Heritage Office
Stilligarry
South Uist
HS8 5RS



**Scottish
Wildlife
Trust**

9 December 2011

Dear Sir/Madam,

Re: Sound of Barra proposed Special Area of Conservation

The Scottish Wildlife Trust is pleased to comment on the Scottish Natural Heritage (SNH) proposal to designate the Sound of Barra as a Special Area of Conservation (SAC) under the Habitats Directive. The Scottish Wildlife Trust fully supports the proposal to designate the Sound of Barra as an SAC for its qualifying features of reefs, subtidal sandbanks and harbour seals.

Designating the Sound of Barra as an SAC would be an important step, not only towards completion of the Natura 2000 network, but towards the ecologically coherent network of marine protected areas (MPAs) required by the Marine (Scotland) Act 2010. Furthermore, a Sound of Barra SAC would contribute to the international agreement to create a network of well-managed MPAs in the North East Atlantic under the OSPAR Convention.

Scotland's strategy for the conservation of the marine environment focuses on a three pillar approach, consisting of species conservation, site protection and wider seas measures. The Scottish Government has committed to site protection measures through domestic legislation that requires the creation of new nature conservation MPAs. Furthermore, the Habitats Directive requires the designation of an ecologically coherent network of SACs to protect habitats and species listed in Annex I and II.

A network of protected areas should maintain the processes, functions, and structures of the intended protected features across their natural range. Extending the range of SACs for reefs, sandbanks and harbour seals is a step toward ensuring Scotland's network of marine protected areas includes adequate geographic coverage.

Reefs - We note that the structure and function of the reefs is considered good and that they exhibit a variety of habitat types, providing space for a wide variety of marine organisms. It is understood that the reefs within the Sound of Barra have proved to be resilient to the recent levels of human activity within the Sound.

Sandbanks – The sandbank features of the Sound of Barra fully meet the definition; in particular, we note that all four sub-habitats are present within the site. Seagrass beds are nationally scarce and the Sound of Barra represents a large, well developed area of this habitat which is an important nursery area for commercially important fish species. We also note that that the site contains probably the largest maerl beds found in the UK's seas.

Harbour seal (*Phoca vitulina*) - Scotland's coastal seas are a stronghold for harbour seal in the UK, and within Europe. The Scottish Wildlife Trust fully supports the assessment for inclusion of harbour seal as a qualifying feature of the SAC. The Western Isles represents a clear gap in the geographic coverage of the network of protected sites for harbour seals in the UK and designation would address this.

We note that the harbour seal population in the region has declined over the past 20 years, a trend that has been observed around Scotland's coastline. We welcome the work of the Scottish Government and SNH to develop a better understanding of this decline.

Patron HRH The Prince Charles, Duke of Rothesay **Chairman** Allan Bantick **Chief Executive** Simon Milne MBE
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Management and Socio-economic considerations

The clear acknowledgment in the consultation documents that selection is solely based on scientific information is welcome. We believe the scientific case put forward to support designation for the features is unarguable.

We recognise that socio-economic factors will inform management of the site and the consultation documents address some of the issues of post designation management of the site. It is clear however, that future management of the site will require a greater understanding of the current socio-economic activities and their interactions with the qualifying features.

We welcome recognition at this stage that in order to prevent any deterioration of the site features, management of the site following designation will require restrictions on activities that cause disturbance of the seabed. With regard to sandbank features, the extremely sensitive nature of maerl beds, twinned with their extreme longevity make it vitally important that activities that can cause physical disturbance or smothering are prohibited. Equally, the lengthy regeneration period of seagrass beds following disturbance means that they are also particularly vulnerable.

The Scottish Wildlife Trust aims to encourage people to see, learn about and enjoy wildlife and to create opportunities for greater involvement in wildlife conservation. A Sound of Barra SAC would be a community asset, inspiring people to engage with and learn about the marine environment and the life it supports. We would also like to highlight that designation could provide the opportunity to further develop the wildlife tourism sector in a region already renowned for its unspoilt environment. The SAC could be utilised to raise the profile of the Southern Western Isles, broadening the existing tourism sector and adding diversity to the local economy.

Yours faithfully,

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About the Scottish Wildlife Trust

The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 35,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages over 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

The Trust's vision for Scotland's wildlife requires a network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas. This can be achieved through:

- Protecting vulnerable areas from further loss
- Restoring and enhancing degraded habitats
- Expanding these areas to form an integral part of large-scale, wildlife-rich landscapes
- Having a diverse range of people who are increasingly knowledgeable of, and actively engaged in, wildlife and conservation.

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