

Scottish Wildlife Trust

Rural Affairs, Climate Change and Environment Committee

Call for Evidence – National Planning Framework 3



The Scottish Wildlife Trust welcomes the opportunity to submit evidence to the RACCE committee regarding the National Planning Framework 3 (NPF3). We will concentrate our evidence on national ecological networks and peatland restoration and how addressing these issues in planning will help deliver

- a sustainable rural Scotland; and
- Scotland's climate change targets, the policies and proposals set out in the RPP2 document, and the Scottish Government's draft Climate Adaptation Programme

National Ecological Network

Background

A national ecological network (NEN) is a, practical, positive and long-term solution for enhancing Scotland's natural environment and linked to this, the social and economic prosperity and sustainability of its rural and urban communities. At its core is the recognition of the multiple benefits that healthy and productive ecosystems can bring to Scotland.

A NEN would ensure all levels of government, NGOs, landowners and managers coordinate actions to protect and enhance the natural environment, be it at a local or national scale. The NEN is a means of effectively and sustainably directing the numerous on the ground initiatives that are already happening and marrying them with high level policies with the aim of achieving greater total overall gain for stakeholders.

It would bring a level of strategic planning for the natural environment more commonly associated with major infrastructure projects - thereby placing the same importance on planning for 'green' (and blue) infrastructure as is done when for planning for 'grey' infrastructure.

Within a planning context, how development contributes to the NEN would become a material consideration and new build would incorporate elements of green infrastructure where appropriate. At the landscape scale, local and strategic development plans would help to identify the most appropriate place for large scale green infrastructure projects that would deliver multiple benefits.

In urban areas the NEN could provide a focus for the coordinated development of green infrastructure such as biologically diverse greenspaces and parks, green roofs, tree-lined streets, cycle routes and sustainable urban drainage systems.

Across the lowlands, the NEN could help direct agri-environment spend towards schemes that best connect core habitats to ensure hedgerows, woodlands, rivers and other natural features are linked to act as stepping stone habitats for species.

The NEN would provide strategic direction in upland areas. The NEN could help inform land management decisions, encourage collaborative working by landowners to deliver multiple benefits such as peatland and woodland restoration.

NEN and RPP2

RPP2 sets out the Scottish Government's ambitions for rural land use which includes low carbon actions such as peatland restoration and woodland planting. We believe that low carbon activity, if coordinated under an NEN, would allow a more strategic approach to actions, thus according with RPP2 which recognises the importance of the planning system in promoting sustainable development and helping Scotland adapt to climate change and mitigate its effects. RPP2 states that NPF can play its part in supporting the transition to a low carbon future.

When the second NPF was published in 2009, we supported the recognition in NPF2 of the importance of an NEN in delivering large strategic restoration projects (such as peatland restoration). We believe an NEN remains just as relevant to NPF3, particularly as the Scottish Government has made a substantial monetary commitment to restoring peatlands. An NEN allows for a strategic approach across the whole of Scotland, moving actions towards the delivery of a low carbon economy.

NPF2 stated: The creation of national ecological networks, potentially encompassing large strategic habitat restoration projects, could make a major contribution to safeguarding and enhancing biodiversity and landscape, make it easier for species to adapt to climate change and create a better environment and new opportunities for local communities. Major linear infrastructure projects such as railways, roads, pipelines and cables should be seen as opportunities to strengthen green infrastructure and ecological networks. River basin management plans should highlight opportunities to enhance the ecological health of the water environment.

Although the draft NPF3 refers to a national ecological network in "Scotland Today" it appears not to be a priority, or be referenced in "Scotland Tomorrow (it is only mentioned in the context of the Scottish Biodiversity Strategy). We believe lack of recognition of an NEN in NPF3 would be a backward step as the planning system is the ideal vehicle for coordinating action to ensure that green infrastructure projects such as peatland restoration, agri-environment spend, woodland planting, green infrastructure creation or enhancement are aligned to deliver multiple benefits to areas where action is needed most - be it to slow water movement in an upland catchment, store carbon, increase habitat connectivity, alleviate urban air pollution or contribute to health and well-being by connecting people to nature. Local authorities across the whole of Scotland need a clear steer on how to maximise the benefits from ecological networks; combined action across 32 councils and two national parks would collectively form an NEN.

NEN and Climate Ready Scotland: Scottish Climate Change Adaptation Programme

The Scottish Government's climate change adaptation programme has the ambition for the natural environment of: *A Scotland with a productive, healthy and diverse natural environment which is able to adapt to change.* This is underpinned by three objectives including: *Supporting a healthy and diverse natural environment with capacity to adapt.*

The above objective will be delivered by, inter alia: *Promoting the role of green networks in helping Scotland to mitigate and adapt to climate change by strengthening habitat networks, reducing habitat fragmentation and providing opportunities for species to migrate.*

Therefore to align government policies, including the 2020 biodiversity challenge and the Land Use Strategy, strategic national planning should recognise the multifunctionality and benefits that flow from committing to a national ecological network.

We firmly believe ecological networks are important to the whole of Scotland and not just the central belt where efforts are being concentrated through the Central Scotland Green Network. Indeed we would argue that the investing in green infrastructure in rural areas (such as peatland and woodland restoration) is likely to help deliver Scotland's 'green-collar' industry with long-term self-sustaining jobs being created.

The potential for green jobs is already being demonstrated at the Trust's Coigach - Assynt Living Landscape project which aims to restore the health of the whole Living Landscape ecosystem in this area by improving and reconnecting habitats (especially native woodlands). The project has already created three part time jobs (4 days a week) and one full time job.

We believe NPF3 can be ambitious and create the quality places that Scottish Government wants to see but there must be an endorsement of the NEN which should be included in Scotland Tomorrow to ensure that ecological networks are embedded in future iterations of NPF.

We are not alone in this view as SEPA, in their oral evidence to RACCE on 29 January 2014, stated:

As for the national ecological network, we support the NPF's support for the Central Scotland Green Network. It does not go so far as to say that a national ecological network should be established but, nevertheless, it says that that is an aspiration. That is important, and we hope that it will appear in the next national planning framework. However, there will need to be concerted action if we are to get such a network to the position at which it could be a national development. I also note the drive in the 2020 biodiversity challenge to encourage such developments and get us to a place where a national ecological framework might be established. Having those strengths would be useful.

Peatlands

RPP2 states:

With our partners, we are working to ensure that Scotland's peatlands will be managed in ways that conserve their substantial carbon stores and biodiversity. Where peatlands have been damaged, action will be taken to prevent further damage and where practicable to restore them to a favourable condition in which they are no longer a source of greenhouse gas emissions

NPF3 appears to prioritise restoring peatlands in the north and west. Whilst we note some of the deepest peatlands (e.g. blanket bogs) are found here, threatened and or degraded peatlands are present in other areas of Scotland including the lowlands (e.g. lowland raised bogs). Peatland restoration is not just a Highland rural issue; many lowland raised bogs are found in the Central Belt and Borders.

In 2012 the Scottish Wildlife Trust published a report on Scotland's lowland raised bogs. The aim of the project was to assess the current state of 58 sites (covering just over 4000 ha) and to analyse changes in condition by comparison with surveys carried out in 1994/5. The project also identified sites suitable for restoration and identified landowners supportive of restoration.

The main findings were:

- 48% of sites showed deterioration in condition, 36% of sites showed an improvement in condition and 16% of sites showed no change in condition
- The total carbon stored across the survey area was estimated to be 10.1 Mt of carbon.
- An extrapolation from the carbon stored in the surveyed sites gives an indicative carbon storage figure for all Scottish lowland raised bogs of 59.4 Mt of carbon.
- In their existing condition the surveyed sites have little potential for active peat accumulation and carbon sequestration
- Active management will be required to counteract past damage and bring the sites into favourable condition.

The main causes of damage to lowland raised bogs were from:

- Site drainage - 97% of sites were affected by artificial drainage ditches across the mire expanse.
- Woodland and scrub invasion - 45% of the restorable peatland area was covered by open and closed-canopy woodland or scrub
- Peat cutting - 9% of sites were subject to active peat cutting on a semi-commercial or commercial scale

Wind farms on deep peat

At the evidence session on 29 January 2014, the committee discussed wind farms being located on deep peat (> 1m). The Scottish Wildlife Trust has provided below some recent examples of planning applications that the Trust has examined in which some of the proposed turbines are located on deep peat.

Musdale Wind Farm (August 2013)

Argyll and Bute, 7 km SE of Kilmore near Oban. 16 Turbines total, 7 turbines (T) located on deep peat: T2 – 2.0 m; T5 – 1.8 m; T6 – 2.7 m; T7 – 2.2 m; T8 – 3.3 m; T9 – 1.0 m; T15 – 1.2 m

South Kyle Wind Farm (September 2013)

~20km E of Maybole, near Dalmellington. 50 turbines total: T 12,14,35,38,41,45,49 on 1-2 m peat

Strathy South Addendum (November 2013)

~18km SW of Strathy Village. 47 turbines. 20 on peat >1 m; 13 on peat >2 m.

Cairn Duhie (December 2013)

Near Ferness, between Nairn and Grantown-on-Spey. 20 Turbines, 5 turbines and control station on peat >1 m, up to 4 m.

Strathy Wood (January 2014)

~11 km S of Strathy Village. 26 turbines, at least 7 on peat >1 m; possibly more (peat probing incomplete).

Dr Maggie Keegan
Head of Policy and Planning Scottish Wildlife Trust