



Please ask for: Craig Baxter
E-mail: craig.baxter@highland.gov.uk
Date: 13/03/2015

Dear Dr Patricia Bruneau,

Highland Council response to SNH carbon rich soil, deep peat and priority peatland habitats consultation

Please find enclosed our comments in respect of the above including the required consultation form. Note that these comments have been prepared by officers in my service and that, given timescales, it has not been possible to report these to Committee at this point. We are grateful for the opportunity to have had engagement in the process and welcome further consultation as you progress with your mapping and any associated guidance.

Please do not hesitate to contact me, or my colleague Craig Baxter (craig.baxter@highland.gov.uk) for further information on our comments.

Yours Sincerely

Stuart Black

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RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately.

To insert cross in box, place cursor over box. Double click on left hand side of mouse and select default value "checked". To deselect, select default value "unchecked"

1. Name/Organisation

Organisation Name (if relevant)

The Highland Council

Position hold (if relevant)

Surname

Baxter

Forename

Craig

2. Contact details

Postal address:

Highland Council Headquarters, Glenurquhart Road

Postcode IV3 5NX

Town Inverness

Phone:01463702264

Email: craig.baxter@highland.gov.uk

3. Permissions - I am responding as...

Individual

Group/Organisation

Please cross as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Natural Heritage web site)?

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please cross ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Are you content for your **response** to be made available?

Please cross as appropriate

Yes No

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- (d) We may share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for SNH to contact you again in relation to this consultation exercise?

Please cross as appropriate

Yes

No

4. Where to send your response

Consultation responses should be sent by 5pm on Friday 13 March 2015.

Written responses should be addressed to :

Dr Patricia Bruneau
Carbon and Peatland consultation
Scottish Natural Heritage
231 Corstorphine Road
Edinburgh EH12 7AT

Digital responses should be sent to:

CarbonMap@snh.gov.uk

5. Further information

This consultation paper can be viewed online on the consultation web pages of Scottish Natural Heritage's website at: www.snh.gov.uk/consultations/.

Should you require a paper copy of the Consultation please contact:

Dr. Patricia Bruneau
Scottish Natural Heritage
Tel: 0131 3162618 or email: CarbonMap@snh.gov.uk

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Consultation Questions – Please insert your comments in the allocated space below.

Comments are invited on the methodology for mapping carbon rich soil, deep peat and priority peatland habitats described in part 1 of the consultation document.

Q.1. Do you think SNH's approach to mapping carbon rich soil, deep peat and priority peatlands is appropriate and scientifically robust?

SNH's approach relies on re-classification of LCS88 (vegetation layer) and data from the Soil Survey of Scotland. Given the age of the data, it is likely that there are inaccuracies in what the final maps show and the actual conditions on the ground. It is acknowledged that this exercise did not undertake ground-truthing and therefore the reliability of the mapping for any uses beyond indicative could be challenged. The data sets used to produce the mapping are at different scales and this introduces an additional element of uncertainty that reinforces that the mapping should only be used indicatively. In this light, Highland Council acknowledges that the carbon rich soil, deep peat and priority peatland habitats (CPP) mapping is intended to 'inform rather than determine operational or strategic decisions' and is 'not an alternative to a detailed peat survey'.

Q.2. Are there any issues related to the methodology for creating the map, or other issues related to the rationale for creating a 'Carbon and Peatland' map (2014) that you would like to raise?

The Highland Council acknowledges that the nature of this work is technical and therefore descriptions of the applied methodologies are necessarily complex. However, there would be merit in describing the methods in the final mapping in providing a non-technical summary, like that included below:

Step 1: Soil Survey of Scotland used to define carbon richness and peat depth (soil layer, eg. deep peat).

Step 2: Re-evaluation of LCS88 maps to map peatland habitats (vegetation layer, eg. peat forming sphagnum mosses).

Step 3: Define 'carbon and peatland' Classes based on an 'expert judgement' of Steps 1 & 2.

The definition (1.6 of the methodology) given for 'carbon rich soils' (*any soil with a surface peat layer – no minimum depth*) will inevitably capture a large area within the Highlands where such soil types are widespread.

Whilst the Council acknowledges that this map is intended as 'strategic', there is a risk that it will be interrogated at a larger scale. Therefore it would be appropriate to 'simplify' the boundaries of each Carbon & Peatland Class and remove any fragmented areas below a certain size. In a similar context, in order that the most important parcels of land are identified by the mapping, and to prevent creating a map that has less practical strategic use, anything shown on the map beyond Class 3 should be removed. Furthermore, if areas are already afforded international or national policy protection through existing designations (e.g. SSSI), the most vulnerable areas of CPP are those outwith the designations. A more effective strategy may be to only identify those areas that are hydrologically connected to, but outwith, designated areas on the CPP map.

Given that the wider purpose of the map should be to inform integrated land use, it should identify opportunities as well as constraints, with reference, for example, to the Highland Forest and Woodland Strategy- opportunities and constraints map.

In the methodology, Table 5: Vegetation layer v Soil layer presents 'Class X'. This is an anomaly where areas of deep peat (>50cm) appear to be given a lower priority due to a limited peatland vegetation layer which The Highland Council suspects to be an indication of forest cover. If this

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definition accepts that forestry remains the primary land use the definition of the class should clearly state this. Or if it is intended that these areas be given a higher priority (Class 1 or 2) in recognition of their restoration potential, this should be clearly explained.

Comments are invited on advice for using and interpretation of CPP map

Q3. Do you agree that classes 1 & 2 of the 'Carbon and Peatland' map (2014) shown in Table 4 should be used as the basis for mapping 'carbon rich soil, deep peat and priority peatland habitats' as set out in Table 1 of SPP (Spatial Frameworks)?

Including Classes 1 & 2 of the CPP map in Spatial Frameworks for wind energy development to be prepared as set out in SPP would be unduly restrictive and will ultimately weaken the effectiveness of safeguarding the most important areas of peatland, that SPP seeks to achieve. In any case the SNH consultation question 3 is ambiguous in so far as it suggests use of Classes 1 & 2 "as the basis for" mapping CPP in the spatial framework, without explaining what the opportunity or expectation would be for further work on the mapping for use in the spatial framework and whether that would be undertaken by SNH or by local planning authorities.

As highlighted in the sections above, the purpose of the CPP mapping is **indicative**. The resolution and age of the data, and the small-scale mapping limits its usefulness for Spatial Frameworks. Whilst similar constraint maps like areas of wild land have some practical use due to the nature of the qualities for which the areas are identified and the potential for impacts on these qualities from wind development, CPP is fundamentally different. If CPP mapping was produced for use in Spatial Frameworks only displaying Class 1, this would emphasise the significance of the CPP resource. Given that the likely proposals will be outwith designated sites, only identifying those Class 1 areas outwith designated sites (as suggested above) may provide a more effective approach to safeguarding CPP.

By creating a Class X and not including it for consideration in the Spatial Framework, there is a clear risk that areas of existing forestry may become under greater pressure for wind energy development. In the context of CPP, this may lead to unintended impacts on areas of areas that would otherwise be identified as Class 1 CPP- only excluded due to their current modelled vegetation cover as forestry (see response to Q2 above).

The Highland Council believes that, as SPP states, wind energy development may be acceptable in areas of peat, provided that *any significant effects on the qualities of [CPP] areas can be substantially overcome*. The Highland Council are consulting on this suggested approach from 16 March to 11 May 2015 and more information is available online: www.highland.gov.uk/onshorewind.

Other comment on definitions

Q.4 Do you have any other comments relating to the location and definitions of carbon rich soil, deep peat and priority peatland habitats?

Forestry may have limited priority peatland vegetation due to the existing tree cover, but the underlying soil is likely to contain surface peat and often peat depths well in excess of 50cm. Arguably these areas should be mapped as Class 1 or 2, rather than a Class X. With reference to the Scottish Government policy on the Control of Woodland Removal, where it is considered appropriate to remove woodland for priority habitat restoration (without any requirement for compensatory planting), this would suggest that the ground falls into Class 1 and therefore not a preferred site for windfarm development. Class 2 areas may be suitable for peatland restoration, but these areas are a lower priority and therefore more likely to attract a requirement for compensatory planting.

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