

Response to the SNH Carbon rich soil, deep peat and priority peatland habitats consultation

by Scottish Environment LINK

13 March 2015



Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for this community in communications with decision-makers in Government and its agencies, Parliaments, the civic sector, the media and with the public.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK members welcome the opportunity to comment on this consultation.

Consultation response

The consultation proposes that land Classes 1 and 2 should be the basis for mapping carbon-rich soil, deep peat and priority peatland habitats i.e. areas of significant protection under Scottish Planning Policy.

We do not agree with this approach, as it means that areas of deep peat which currently do not support dominant peatland vegetation, or 'Class X', are excluded from areas of significant protection, which we believe to be a serious flaw in the approach. We are concerned that this would steer development towards damaged but recoverable peatland resulting in more pressure on these sites.

Class X areas will include sites which are prime candidates for restoration, where siting a wind farm could result in significant emissions and prevent full restoration of the site. In our view this is incompatible with Scottish Government policy and targets for peatland restoration, which the Draft SNH National Peatland Plan highlights as "a key area for investment... for meeting climate change targets in 2013 - 2027".

Whilst windfarm development may be possible within some Class X areas, the presence of deep peat is likely to always be a significant environmental constraint, requiring careful consideration. **Therefore we consider that Class X areas, where capable of restoration, should be included in areas of significant protection.**

A further issue that requires consideration is peatland hydrology. Peatlands are necessarily wet and hydrological connections have great importance in maintaining their integrity. Disruption to hydrology can result in degradation of surrounding areas. We would welcome consideration of hydrological units in the final document, informing the siting of development.

LINK Consultation Response

This response was compiled on behalf of LINK and is supported by:

Buglife

Butterfly Conservation

Froglife

John Muir Trust

National Trust for Scotland

Plantlife

RSPB Scotland

Scottish Wild Land Group

Scottish Wildlife Trust

Woodland Trust Scotland

For more information contact:

Alexa Morrison
Conservation Policy Officer, RSPB Scotland
Alexa.Morrison@rspb.org.uk

Davie Black
Conservation Co-ordinator, Plantlife Scotland
Davie.Black@plantlife.org.uk

Stuart Brooks
Chief Executive, John Muir Trust
Stuart.Brooks@jmt.org

For more information about LINK see www.scotlink.org

LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899). LINK is core funded by Membership Subscriptions and by grants from Scottish Natural Heritage, Scottish Government and Charitable Trusts.

Registered HQ office: 2 Grosvenor House, Shore Road, Perth PH2 8BD tel 01738 630804 email enquiries@scotlink.org
Parliamentary office: 3rd Floor, Gladstone's Land, 483 Lawnmarket, Edinburgh EH1 2NT tel 0131 225 4345 email parliamentary@scotlink.org