

Response to Scottish Natural Heritage's consultation on Scotland's National Peatland Plan

By Scottish Environment LINK
12th September 2014



Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 30 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 works mainly through Taskforces – groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

LINK welcomes the opportunity to respond to the National Peatland Plan consultation <http://www.snh.gov.uk/climate-change/what-snh-is-doing/peatland-action/national-peatland-plan/>. A number of LINK members interested in this issue came together to discuss and support the development of this response. LINK held a peatland workshop for members and other invitees in February 2014, the outputs of which are available on request.

Response to specific questions

Section 2 – Vision

Do you have specific comments on the vision?

LINK welcomes the vision – especially its long term view. However, we would like to see considerable level of commitment and action so that the 2030 deadline for seeing “peatlands in a healthy state and widely regarded as resilient” can be brought forward.

Section 5 – Benefits of well managed peatlands

What additional important benefits should we highlight?

The NPP should include as benefits the cultural importance of peatlands and the sense of identity they give to Scotland.

Section 6 – Opportunities for having healthier peatlands

What refinements or alternatives to these criteria for restoration should we consider?

LINK agrees with the broad criteria set out in the consultation document. However, these must be refined into more detailed criteria in consultation with experts and stakeholders.

No criterion should be chosen that would compromise the natural environment and biodiversity.

LINK considers all priority habitats as 'priorities' for restoration, not just designated wildlife sites (SSSI, NNR, SAC, SPA and Ramsar). Improving designated site condition is important too. However LINK wants to see areas outwith designated sites also eligible for restoration.

Projects should aim to realise mosaics within landscapes where appropriate – a mechanism to make this happen may be needed.

Connections should be made with the Peatland Carbon Code, including:

- Recognising projects under the Code
- Investigating the potential for using the compliance mechanism in the Code more widely.

What other key policy or guidance documents should we be steered by in Scotland?

The Scottish Climate Change Adaptation Programme should steer this work, especially the Programme's vision and principles.

Have you suggestions about how we can best deploy management measures?

There remains a significant unanswered question about how the NPP relates to or guides SRDP funds and the Peatland Action funds provided by Government. These relationships must be clarified.

LINK wants to see Peatland Restoration Focus Areas identified across Scotland to concentrate restoration effort. Focus Areas should have a high density of peatland sites but should be defined using suitable evidence and agreed criteria which include multiple benefits (as discussed above).

Focus Areas could aim to focus on particular sectors (although not exclusively), e.g. water quality in Galloway or raised bogs in the Central Belt. Sectors/issues could include:

- Drinking water
- Catchment management
- Tree removal – and restocking issues
- Overgrazing by sheep
- Raised bog restoration

Lead organisations should be identified in each focus area – some already exist in these areas and are already leading work. For example, the Loch Lomond and Trossachs National Park has recruited a Peatland Restoration Officer. Focus areas need a dedicated person to coordinate action, engage landowners, bring in other funding, monitor action, multiply benefits, spread the messages etc. We believe that the Peatland Action fund must pay for restoration officers in each Focus Area.

What other funding sources should we be directing land managers to?

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.

LINK has no comment

What would make good measures of success?

LINK has no comment

What protocols should we use for measuring these?

LINK has no comment

Can you offer/suggest good demonstration sites?

LINK members who manage peatland sites and have or who plan to restore would welcome the opportunity to demonstrate best practice and lessons learnt. Examples include:

- RSPB Forsinard Nature Reserve – blanket bog restoration including plantation removal
- NTS restoration work at Ben Lomond, Goatfell, Ben Lawers and Mar Lodge,
- Scottish Wildlife Trust lowland bog restoration across number of sites in lowland Scotland
- Butterfly Conservation's Bog Squad and community involvement in the Central Belt
- Wester Moss nature reserve, Stirling (Stirling Council/Butterfly Conservation)
- Buglife's restoration project in partnership with Forestry Commission Scotland, North Lanarkshire Council and Scottish Wildlife Trust at Fannyside Muir near Cumbernauld

Can you suggest further priority research questions?

- Management techniques for commercial woodland established on peat – the implications of clearance and peatland restoration on carbon balance.
- Importance of scrub and woodland on lowland raised bogs for invertebrates and other wildlife
- Dispersal on invertebrates between lowland raised bogs

Section 7 – Working with and supporting land managers

What are your views on how we can best communicate with land managers to secure greater involvement?

LINK believes that communication with land managers at the scale needed for peatland restoration would be best achieved through the Focus Area approach outlined above.

Do we have an adequate toolkit of guidance, incentives and regulation - if not, what is required?

LINK does not believe that the existing funding mechanisms provide adequate incentives to landowners to engage in peatland restoration. None of the existing measures do anything but cover the costs of restoration work and they are therefore only attractive to landowners who are already committed to peatland restoration. The Vision contains the supporting aim to "Ensure peatland values are reflected in the support given to those who manage them;" There is nothing in the rest of the document that addresses this vital issue and, unless it is addressed, it is unlikely that the plan will come close to

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realising its aims. Similarly the NPP must address policies and safeguards to properly protect existing peatlands. Government must look at ways of recognising and supporting land owners who 'do no harm' to peatlands.

LINK does not believe that policy measures are sufficiently aligned towards ensuring peatland restoration is prioritised and promoted. This is fully explained, with recommendations for change in a report by RSPB Scotland http://www.rspb.org.uk/Images/Microsoft%20Word%20-%20Realising%20the%20benefits%20of%20peatlands_tcm9-282611.pdf

Section 8 – Development Planning

Should more be done to encourage and promote good and proportionate mitigation and restoration on peatland sites subject to planning development – if so, what?

LINK is calling for the following targets to be met which would reduce peatland extraction:

1. Phase out peat use by public bodies completely by 2020
2. Annul all extant commercial peat extraction rights by 2020 (either by revocation, management agreement or outright purchase)

Should industries other than commercial peat extraction have a specific planning steer towards degraded peatland?

LINK does not want to see any industries steered towards degraded peatlands. We believe that, although degraded, these peatlands remain restorable so that carbon can be secured and biodiversity can return to the habitat.

Section 9 – Implementation

Who should be members of the stakeholder group, and why?

Scottish Environment LINK would like to have representation on the Stakeholder Group. Many of our members are either actively managing peatland habitats or interested in seeing the benefits of peatland restoration. LINK can play a role with others, in:

- Calling for changes to policies which affect peatlands
- Making the case for peatland restoration and maintenance by communicating the evidence of benefits of members work through monitoring activities
- Raising the debate with the public and with decision-makers.

LINK recommends that any stakeholder group is constituted as an advisory group – able to advise and support the over all programme with delivery of restoration action by the Lead Organisations in the Focus Areas. LINK members are ready to commit time to this.

Are there further benefits to having well managed peatlands not detailed here?

LINK has no comment

What else should we be doing to benefit peatlands?

LINK has no comment

Any other Comments

LINK has no comment

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

- Amphibian and Reptile Conservation
- Badenoch and Strathspey Conservation Group
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation Scotland
- Cairngorms Campaign
- John Muir Trust
- National Trust for Scotland
- North East Mountain Trust
- Ramblers Scotland
- RSPB Scotland
- Scottish Wildlife Trust

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