



A Consultation on the National Peatland Plan

RESPONDENT INFORMATION FORM

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1. Name/Organisation

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3. Permissions - I am responding as...

Individual

Please cross as appropriate

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Please cross as appropriate Yes No

(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

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Are you content for your response to be made available?

Please cross as appropriate Yes No

Written responses should be addressed to : Morag Elliott
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Inverness, IV3 8NW

Digital responses should be sent to:
peatlandplan@snh.gov.uk

(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/ Scottish Government to contact you again in relation to this consultation exercise?

Please cross as appropriate Yes No

INTRODUCTION

Scottish Natural Heritage, working with Scottish Government and a range of stakeholders has drafted a National Peatland Plan to highlight the importance of our peatland. We draw attention to the poor state of large areas, and propose building on existing initiatives to secure their sustainable use, management and restoration. We also set out some proposals for research and awareness-raising.

To achieve these objectives we need the help and support of all those with an interest in ensuring that our peatland is managed as a national asset which benefits society as a whole. So whether you own or manage an area of peatland, represent others who do, or simply enjoy their open spaces, their wildlife or their tranquillity, we seek your views on this draft Plan.

Please use the form below to give us your views. Responses to specific questions are particularly welcome, but any comments you may have in relation to the future management of our peatland will be much appreciated and taken into account in developing the Plan.

National Peatland Plan Consultation Document Consultation Questions

Section 2 – Vision

Do you have specific comments on the vision?

Overall the vision is good. It is ambitious but not unachievable and its timeline is sensible. However in the period upto 2020 there is no mention of public funding streams. I presume that the Vision assumes that they are in existence to as without them you cannot deliver the Vision, this should be made explicit In the 2020-30 Vision it states that “funding will have extended from public to private sources” so it must be stated that public funding will be the primary, initial source of funding otherwise there is no base for the funding to extend from.

The vision needs to take into account the estimated area of restorable peatland, 600,000 ha and figure out how the current pace of restoration ties in with it. Currently it would take 60 years to restore, with the proposed accelerated restoration 30 years, so 2045. This is of course moving into the realms of targets but by 2030 the Vision seems to infer that all degraded peatlands are in the process of being restored. As by 2050 “the rewards... of restoration... should now be evident” so that needs a period of recovery and for bogs that can be decades.

Within the context of the future the Vision needs to state that our peatlands will be an integral part of the healthy ecosystems surrounding them. I think it is correct that initially we look at peatlands as a discrete habitat to get the ball rolling in terms of restoration. But particularly for lowland raised bogs, they cannot be restored sustainably without restoring the land beyond the current bog boundary as it is an artificial and man-made one. In upland areas blanket bogs form part of an upland habitat mosaic along with upland heath and rough grassland and potentially woodland that is not easily delineated.

Regarding the supporting aims. The second aim “Ensure peatland values are reflected..” this statement is confusing as peatlands being inanimate don't have values. They have a value intrinsically and through anthropogenic interpretation. From the latter part of the statement I think what was trying to be said was that peatland have many types of value and the monetary support given to those who manage them needs to reflect the direct and indirect economic value of a peatlands' services to humans. While also recognising that they are valued by people in ways that cannot be measured in terms of economics.

Section 5 – Benefits of well managed peatlands

What additional important benefits should we highlight?

The benefits in the plan seem to cover the main ones.

Section 6 – Opportunities for having healthier peatlands

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

Protected areas will always be on top of the list as there is a statutory responsibility to do this and the responsibility lies with SNH/ SG. Plus there are the SSSIs in favourable condition targets, which will lead to restoration of these habitats with or without a Peatland Plan. So these areas will have to be restored Peatland Plan or no Peatland Plan, the value of the Plan would be to start restoring areas with no Statutory Protection. It needs to be made clear that the prioritisation criteria is ranked and Protected sites will be on top and are already affected by existing policy and legal drivers. One other criterion that should be used is size, restoring a big site will be more cost effective than restoring a similar but smaller site. This is inferred in the middle two priorities

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

Unfortunately it doesn't exist and that is how to actually deliver the ecosystem approach.

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

All the measures that you mention are sensible and seem to cover most of the issues relating to large-scale deliver of restoration as economically as possible. But the key issue above and beyond all of them is what is the level of public funding going to be? I will save this for the AoC but in short if you don't know your budget for restoration, you won't be able to estimate how much you can restore annually, figure out how many contractors you need, organise training for them if required etc., etc.

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

For private landowners, business-people, they will want to know if they apply for funding that it will be there. Unlike NGOs they won't want to spend time paying for drafting an application to go to the HLF etc. that they may not have a chance of getting and if they do will be intensely bureaucratic and will no doubt require a project manager. There needs to be a one-stop peatland funding shop.

What would make good measures of success?

An accurate Peatland map, showing condition (a quick win), annual reporting of the areas of bog under restoration (a quick win), the area of bog in favourable condition (broken down into protected and unprotected areas) a reduction in the area where the critical load of Nitrogen is exceeded. But ultimately you need to know when a bog is reaching the threshold of becoming restored, as you can take measures to restore a bog but that doesn't mean it is restored as soon as that takes place, so the reporting of these two outcomes (management action and then reaching a defined restoration threshold) need to be separated.

The best measure of success would be getting funding outside of the SRDP so you can say we have the budget to deliver X thousand hectares of restoration over the next 6 years. Then reporting on the delivery of that action.

What protocols should we use for measuring these?

No comment.

Can you offer/suggest good demonstration sites?

Some of the wind farm sites that have removed conifer woodland and restored the peatland underneath. For some of them at least there should be existing monitoring to use. Salsburgh Moss as a typical degraded Central Scotland peatland. Wester Moss at Fallin and Fannyside Moss in Cumbernauld are examples of sites under restoration. Rora Moss and Balnamoon in Aberdeenshire are examples of degraded but extensive sites..

Can you suggest further priority research questions?

How can we measure at what point restoration action actually restores a degraded peatland? If there are measures already there to do that, pardon my ignorance. But if large areas are being restored we need to know which sites to keep intervening on and which sites to leave alone once a certain point is

reached.

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?

Secured funding. You can promote peatland restoration until you are blue in the face and unless you have the money to deliver what you are promoting you will have minimal uptake. That said there is a strong case to have a more coherent message being delivered about peatlands to landowners and managers based on the Peatland Plan. You also need to think about your audience. Owners of lowland raised bogs in central and eastern Scotland will have a different agenda to owners of blanket bog in the west and north and those sporting estates with Red Grouse shooting in the central Highlands eastwards. Some of the latter are still actively gripping moors to dry them out for the grouse so they will be more difficult group to convince as they get a bigger return from their peatland than the other groups.

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

There is probably enough of the above but not enough policing of the regulations. When was the last time a landowner or crofter was sanctioned by SGIRPID for muirburn violations? Is there guidance on what is a healthy peatland? If there is it isn't working and/or being reported on.

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?

No comment

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

The plan strongly infers that wind farms are being built on good quality peatland sites. Building roads through peatlands is not good for the hydrology of them, as well as the increased accessibility to sites and consequently increased disturbance to wildlife. Certainly it should be considered if a site is restorable, if the plan is serious about restoration then no restorable site should be developed, likewise no site in good condition should be developed to the detriment of its carbon store and hydrology. Obviously such statements are highly idealistic. Highly degraded sites such as those areas of peat dug out in the Somerset levels have been rewetted to become an amazingly biodiverse wetland and reedbed complex so degraded peatland shouldn't be dismissed as a habitat with poor biodiversity potential. Bogs are usually wet for a reason, so they aren't the best places for development if an alternative exists, even if they are degraded.

Section 9 – Implementation

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

I would refer back to my comment about funding, you can only implement if you have the funding to do so. The document talks about funding streams but no figures, so how can we know what can be achieved if there is no budget? You can set up working groups to answer some of the questions raised in the Peatland Plan, but if you are going to raise expectations about delivering a plan that turns out to have inadequate funding (another in a long line of them) then you will struggle to get buy-in to form a stakeholder group and if you can't deliver action what is the point of such a group?

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

I think stronger links need to be made to healthy ecosystems and peatlands being a key part of that as they (in the uplands) cover so much land area. The restoration of a significant proportion of them will have a big impact beyond the boundaries of that habitat and have a national impact.

What else should we be doing to benefit peatlands?

Making sure everyone in Scotland is aware of the value of them; both directly to us and also their other values in a local to global context.

Any other Comments

Further to my comments in the third question of Section 6. This plan needs targets. You have given figures for the amount of restoration currently happening and the accelerated restoration being proposed but there is no time line for when restoration action will be complete or an estimation of what it would cost. An estimated cost based on current work would be very useful to give an idea of how much this will cost. Is it £1million per 10,000ha? I would want to know because if it was going to cost £60million then it compares favourably with building something like a Skye Bridge. I know you can't compare the two, but it is useful to put the cost of management of a large national resource into perspective. Particularly because the cost alone of restoration is tiny (and benefits huge) when compared with large infrastructure projects deemed to also be of national importance.

There is also an estimated figure for the amount of restorable peatland, so it can be worked out how long restoration will take; will this tie in with the Visions' timings? If there are no figures, milestones and hard targets then the plan just seems an unambitious (or realistic?) as the many others that have been produced over the years with no budget to go with them, the SBS being most recent. It has two habitat targets.

The Plan makes no mention of the current funding that SNH has, the Green Stimulus funding, or the SRDP. Is the SRDP going to be the only public funding available to landowners for bog restoration or will SNH have a fund? Or has this not been decided? If the only funding is from the SRDP then I can guarantee that the Peatland Plan will fail to deliver at the national scale it intends to. The reason for this is the past SRDP has not been able to deliver for habitats in terms of biodiversity restoration because a) there are no statistics or maps to see what has been done where, b) it is not fit for that purpose, c) is too complex and not clear in what its priorities are as it seems to prioritise everything and d) it seems impossible to hypothecate funds for a specific purpose in the SRDP, so you could not plan what area of peatland you could restore over the life of the SRDP.

That aside the plan is a really good first step to raise the profile of a really important habitat. It is right that it concentrates on peatlands certainly in its initial phase. But there needs to be something in the plan that indicates how the plan will evolve from on focusing on peatland restoration to one looking at the upland habitats as a whole in an ecosystem approach. That is 10-15 years down the line but it would be sensible for the plan to look at the big picture in the future whilst being clear that in the short to medium term it needs to be focussed on this specific habitat.

The question of ongoing assessment of our peatlands is something briefly mentioned but is obviously required to ensure that the resource as a whole is in good condition. I am not sure if that was the intention but it does bring up the idea of national monitoring and this feeding back into the way that areas are managed if this needs to change. This then leads into the whole habitat quality/ ecosystem health monitoring, reporting, management feedback loop. Again this is something that is getting beyond the scope of the plan but for the habitat to have got to this state and stage something hasn't worked very well and so we need to make a change to ensure that it doesn't happen again. There is no point spending money attempting to restore peatlands if the same practices that are affecting them detrimentally cannot be altered.

There also needs to be recognition of the different zones of peatland use and productivity across Scotland as they have different issues affecting them. The western peatlands near settlements have quite a bit of extensive burning for livestock with a long history, the eastern peatlands are much more productive biologically and economically and have different issues affecting them and the raised and blanket bogs of the east coast, central belt and southern Scotland close to settlements and agricultural land have a whole other set of issues affecting them. The authors of the plan may be aware of this but in many people's minds it may just be the Flow Country they are thinking of and Scotlands' Peatlands are nothing if not diverse.

For lowland raised bogs there needs to be the acceptance that to restore them it will require land take as some many of them have been shorn of their perimeters and lag fen. So the requirements for the restoration of them will be more problematic and expensive (due to loss of agricultural land) than blanket bogs.

