



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Mr Simon Hindson
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The Highland Council
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1 July 2010
Our ref: CNS/SEA/SSEA/00500

Dear Mr Hindson

Environmental Assessment (Scotland) Act 2005: The Highland Council – Supplementary Guidance on Green Networks in Highland Scoping Consultation

We refer to your scoping report, sent to the Scottish Government SEA Gateway on 16 June 2010. In our role as a Consultation Authority, in accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, we have reviewed the above report. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the proposed consultation period are set out below. Detailed comments are provided in the annex to this letter.

Scope of assessment and level of detail

Subject to the specific comments set out in the annex to this letter, we are content with the scope and level of detail proposed for the Environmental Report (ER).

Consultation period for the environmental report

We note that it is proposed that this ER will be consulted on in parallel with the Highland Wide Local Development Plan for a period of eight weeks. We are content with this consultation period.

Concluding remarks

Please note that this response is made in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report and on the Supplementary Guidance.



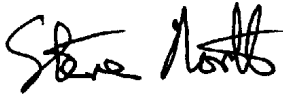
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As you are aware we are very supportive and pleased to see the development of a Green Networks: Supplementary Guidance for the Highlands. We hope that these points are useful and we look forward to continuing to work with you on the development of this guidance.

Should you wish to discuss this screening determination, please do not hesitate to contact Anne Murray on 01349 865333 or at anne.murray@snh.gov.uk or via SNH's SEA Gateway at sea.gateway@snh.gov.uk .

Yours sincerely



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Annex to letter

Description of the Guidance Content

We have a number of comments to make on the Guidance's content:

- We recommend that the guidance presents a definition of green network as opposed to discussing one.
- The objectives should be linked to the Highland LBAPs.
- The Highland Green Network is presented in terms of three different elements. We are unclear why 'protection and enhancement' is separated from both biodiversity & environment and recreation & leisure as we see 'protection and enhancement' as integral to both. From our meeting on the 29 June, we understand that the 'protection and enhancement' heading refers to protected sites however this is not clear from the Scoping Report. We recommend that you change these terms and use either the three headings given in the Sustainability Triangle – environmental, social and economic. Or that you simplify it to just two headings: 'people' and 'wildlife'.
- We recommend that you include a separate chapter on Natura 2000 sites and European Protected Species as per The European Guidance (available at: http://europa.eu.int/comm/environment/eia/030923_sea_guidance.pdf). This will be beneficial when you complete the associated Appropriate Assessment. The sites, the reason for their designation and comments on any likely effects of the plan should be noted. Particular attention should be given to the proposed Coastal Trail. Any potential threats / benefits of the Plan's activities to named species should also be noted.

Context

Table 1 lists plans, programmes, strategies and environmental objectives which will be analysed by the Environmental Report. We have the following comments to make.

International Tier

- The Birds and Habitats Directives are included twice in Table 1 - once together and once separately. We recommend that they are listed separately.
- We advise that the Habitats Directive entry should refer to Article 10 Features (connecting structures). These are very relevant for green networks. European Protected Species should also be referred to.

National Tier

- Under the Wildlife and Countryside (as amended) Act 1981, Schedule 1, 5 and 8 species should be referred to.
- It is worth noting under Protection of Badgers Act 1992 that SNH is not the sole licensee: the Scottish Government licences agricultural and forestry operations.

Scottish Tier

- The Scottish Biodiversity List should be included <http://biodiversityscotland.gov.uk/pageType2.php?id=35&type=2&navID=92> .
- The Scottish Forestry Grant Scheme has been superseded by SRDP.

Scottish National Planning Policy Tier

- European Protected Species, Development Sites and the Planning System Interim guidance for local authorities on licensing arrangements, October 2001 (amended 2006) should be referred to here.

Regional Tier

- The eight Highland Local Biodiversity Action Plans should be referenced here as should the relevant Landscape Character Assessments.
- With reference to the Water Framework Directive, the imminent North East, North Highland and West Highland Area Management Plans should be referred to - these will be very relevant.

Relevant aspects of the current state of the environment

This section provides a broad description of the Highland's natural and cultural environment. However, it does not describe the relevant aspects of the current state of the environment or relate to green networks. Nor does it summarise the likely future changes to the environment without the plan or highlight the environmental characteristics of areas likely to be significantly affected by the plan.

We would have expected this section to have considered:

- habitat networks
- distribution of species
- likely movement of species at differing scales – macro to micro
- the predicted effects of climate change and the benefits of green networks re species movement
- sequestration
- the value of ecosystem services
- paths
- access issues

Table 2

We recommend that the row entitled 'biodiversity, flora, fauna' is expanded to include measures to tackle and reverse the fragmentation of habitats. Fragmentation of habitats leads to the loss of connectivity which in turn leads to a reduction in species movement. This is especially relevant in the context of climate change where species movement is key to their ability to respond and ultimately survive.

This row should also recognise the different scales on which networks operate. For example the micro-scale would be networks within a large housing area and the macro-scale the level at which species migrate.

In the row entitled Water, SUDS will provide opportunities for green network rather than the green network providing SUDS.

Scope and Level of Detail Proposed for the Environmental Assessment

Only one reasonable alternative has been presented here: do nothing. The Scoping Report asks for our view on this alternative.

The alternative would appear to be to have a broad-brush policy on green networks in the LDP but not to amplify this in supplementary guidance. This would have the

disadvantage of not providing any detailed guidance on the location of the existing green network and how it can be enhanced.

Scoping in/out of SEA Issues

We agree that it would be reasonable to screen soil and air out.

Methodology for Assessing Environmental Effects

We recommend that you liaise with SEPA regarding adding a SEA objective for the water environment.

With reference to SEA Objective 9, we recommend that you substitute this with the SEA Objective proposed by the HwLDP: 'Conserve and enhance landscape character and scenic value'.

Appendix 1 - Baseline Information and Maps

A lot of information sources are listed in this annex including a number which are not obviously relevant to green networks. Similarly there are a number of maps presented that don't appear to be relevant. It would therefore be worth refining the list and the map selection.

Under the heading 'population and human health' you could add the information contained within the current Local Plans and the forthcoming HwLDP on the general proposed locations of development.

Under the heading 'water', in the row entitled 'Avoid Impact to and where possible enhance the water environment' the River Basin Management Plan for Scotland should be mentioned as should the imminent North East, North Highland and West Highland Area Management Plans.

Under the heading 'Landscape' Open Space Audits and Strategies should be added.

Under the 'Biodiversity, flora and fauna' heading the data sources used for the mapping work should be referenced. These include, *inter alia*, MLURI Land Cover Maps, SWT Phase 1 Habitat Surveys, Ancient Woodlands Inventory and National Biodiversity Network species records.

We have a number of comments to make on the maps included in this section:

- It would be useful to include additional habitat maps showing wetland, woodland, moorland, and peatland habitats at a Highland wide scale.
- The Highland Cycle Ways map should be updated to show the Great Glen Way, the imminent South Loch Ness Trail and the National Cycle Network 78.
- The Local and National Nature Reserve maps could be combined.

Appendix 2 – Example of Matrix to be used in assessing options

We are supportive of the use of the matrix approach to assess options and have a number of comments to make on the Blank Matrix:

- As we discussed at our meeting on 17 June 2010, we recommend that you add an extra column entitled 'mitigation / additional enhancement'.
- We recommend that the Considerations and Assumptions listed under SEA objectives 1, 2 and 3 are revisited.
 - Firstly the Considerations should be consistently written in such a way that a yes response is positive and no response is negative. For

example you could change 'will it have a detrimental effect on protected species?' to 'will it safeguard protected species?' to conform with the other Considerations

- Additional questions should be added to SEA Objective 1 to ensure that designated sites are safeguarded. For example 'will it safeguard Natura 2000 sites (SPA, SAC and Ramsar)?' and 'will it safeguard Sites of Special Scientific Interest?'
- The fifth question under SEA Objective 1 is about green networks and should be listed under SEA Objective 2.
- The Considerations for Objective 2 should be reallocated. Point 1 should be moved to SEA Objective 1 and points 2 and 3 moved to SEA Objective 3
- Additional Considerations should then be added for SEA Objective 2 including 'will existing green networks be protected and enhanced?', 'will connectivity within the green network be enhanced?' and 'will fragmentation of the green network be avoided?'