

Scottish Executive Ecological Adviser's Unit – EclA Guidelines Comments

We were conscious that the guidelines lost the tag that they applied to both terrestrial and freshwater systems, even if not the marine; perhaps a clearer statement on the extent and limits at the outset would be helpful.

The guidelines acknowledged that they didn't include hydrological or hydro-geological connections early on, but didn't really make the connections later to the linkages between hydrology and ecological function in a range of habitats, notably wetland and peatlands.

General commentary:

The document needs sub-editing to try to remove 'Englishness' from it and make it equally applicable to all parts of the UK.

The document should emphasise its applicability to terrestrial and freshwater habitats, even if it excludes marine assessment.

Specific Points

P 4 Box 1: Should this include a wider range of guidance such as the SNH guidance on windfarms and renewables, and the SEPA guidance on assessing hydro schemes?

1.12 It is not clear where the issues of hydrological or hydro-geological changes are picked up in chapter 4.

P7 box 2: we would suggest that the guidelines make clear that it is good practice for the proponent to seek a scoping opinion from the competent authority, as this is an early opportunity to agree the scope, methods and nature of the ecological monitoring and survey required to satisfy all parties.

P8 box 2: reporting should include clear statements of ecological methods used, and clear presentation of any analytical techniques, and analysis itself.

2.18: Scoping: it would be useful to insert a comment somewhere, to the effect that "it is not good practice to undertake all the baseline survey work and then proceed to a request for a scoping opinion in the expectation that the survey work will be considered either satisfactory or comprehensive"; somewhere around 2.18 to 2.20 we would suggest.

2.26: not sure whether this adequately reflects what we think you're trying to say.

2.29: SNH have also issued guidance on home ranges of birds which may be affected by renewables developments.

3.5: Parishes **do** exist in Scotland, even if they have no administrative function.

3.8: Box 10: should surely include Stroud et al 2001: *The UK SPA Network: its scope and content. Volume 1: Rationale for the Selection of sites*. JNCC.

3.9 World Heritage Sites before Internationally important sites? Insert: Sites **for which the international value has been identified**, or for

3.14 last sentence: this is not necessarily a precautionary approach; why not use "conservative approach" for this suggestion?

Section 3: General commentary: how do you take into account more general designation such as National Parks, ESAs etc, especially where the valued features are habitat-related?

3.27: and the Nature Conservation (Scotland) Act

Box 12; ecological resources: include 'home ranges' and 'migration sites / stopovers'
Ecosystem properties: include 'population viability' as well as mvps

4.7 A **quantitative assessment is preferable to a** qualitative prediction is preferable to an arbitrary scale.

5.1 Do you need a clearer opening statement here? "*Under the terms of XXX, proponents of development proposals are.....*"

5.3 temporary **or permanent** loss of ecological value

5.10 what is an EAP?

6.6 is a key paragraph; it is not legal / possible in many circumstances to impose suspensive conditions, and developers and contractors can only expect decisions to be made in the light of all the information required to enable a full and sound judgement of the case.

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