

By email: craig.jardine@lochlomond-trossachs.org

Inchconnachan: Planning application ref: 2021/0452/DET

RSPB Scotland welcomes the opportunity to comment on the Inchconnachan planning application and accompanying draft island management plan. The native woodland habitats found on Inchconnachan island form part of Scotland's rainforest, an internationally important and increasingly rare habitat¹. Around only 30,000 hectares of rainforest remain in Scotland, much of which is under pressure from over-grazing and invasive non-native species (INNS). Inchconnachan has two designations relevant to this habitat (see designated sites below), both protecting oak woodland which is the largest native woodland habitat component of rainforest. It is the designated sites described below that we have considered the potential impacts of the proposed development against.

Designated sites

Loch Lomond Woods SAC

Given that the footprint of the new proposed development covers less than 0.1% of Inchconnachan and less than 0.03% of the SAC (Special Area of Conservation), we consider there will not be an adverse effect on the integrity of the Loch Lomond Woods SAC.

Inchconnachan is part of the Loch Lomond Woods SAC, a site of international importance designated for old sessile oak woods². The most recent Site Condition Monitoring (SCM) carried out in 2002 found this habitat to be in Unfavourable Declining condition as a result of overgrazing and invasive non-native species (INNS)². Subsequent herbivore impact assessments (HIA) in 2015 and 2019 (summarised in the EIA screening report), found that there has been no prior effort to remove INNS and that herbivore impact exceeded the target for SCM. It is stated that herbivore management is required to improve the condition of the woodland and that the woodland is not regenerating. This confirms that the designated site qualifying habitats on Inchconnachan remain in Unfavourable condition and will not recover without further intervention.

The SAC is underpinned by the Inchtavannach and Inchconnachan SSSI (Site of Special Scientific Interest) which is designated for upland oak woodland. The last SCM was carried out in 2002 and found the condition of the habitat to be unfavourable, with no change from the previous assessment³.

In relation to other impacts, although classed as Ancient Woodland, the presence of INNS such as Sitka and Norway spruce, rhododendron and beech suppress natural regeneration of the understory and native tree species. Natural regeneration is an essential process for improving the site condition of both the SAC and SSSI native woodland habitats and we are therefore supportive of the removal of INNS. In our assessment, the objectives and actions in the draft island management plan are sufficient to address this and would play a vital role in improving the condition of the designated site qualifying habitats on Inchconnachan.

Natural regeneration of the designated site qualifying habitats and other native woodland habitats on the island is also being suppressed due to grazing pressure by herbivores. Although the draft island management plan does take steps

¹ <https://savingscotlandsrainforest.org.uk/rainforest>

² <https://sitelink.nature.scot/site/8298>

³ <https://sitelink.nature.scot/site/808>

RSPB Scotland Headquarters

2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100
Facebook: RSPBScotland
Twitter: @RSPBScotland
rspb.org.uk/Scotland



The RSPB is part of BirdLife International, a partnership of conservation organisations working to give nature a home around the world.

to address this in objective 3, we would suggest the following additional actions are included to maximise the likelihood of success in improving the condition of the native woodland habitat:

1. Retain membership of the Island Deer Management Group (DMG) and attend meetings.
2. Agree to an Herbivore Impact Assessment survey plan with NatureScot and the DMG with recommendations to keep grazing low within 5 years.

Loch Lomond SPA

Although Inchconnachan does lie within the Loch Lomond Special Protection Area (SPA) which is designated for Greenland white-fronted goose (*Anser albifrons*) and capercaillie (*Tetrao urogallus*), our assessment is that there would not be an adverse effect on the integrity of the SPA⁴.

Capercaillie are now extinct on the Loch Lomond islands and would not recolonise naturally. The actions and objectives in the draft island management plan would improve the habitat for capercaillie if they were ever to return and the management of visitors could provide the basis for reducing the risk of disturbance.

The habitats of Inchconnachan are not suitable for Greenland white-fronted geese, as this species only uses areas of open habitat to the south of Loch Lomond during the winter months and so would not be affected.

Biosecurity

Biosecurity should be an essential component of the proposed development and the draft island management plan, complementing both INNS and herbivore management to maximise the recovery of the designated woodland. The current Loch Lomond & the Trossachs National Park Authority (LLTNPA) Partnership Plan has identified tackling INNS as a conservation priority, with robust biosecurity measures critical to improving habitat condition across the National Park and safeguarding against further spread of INNS. The successful eradication of INNS on the island is reliant on preventing further contamination during the construction phase, and ongoing access and management activity.

A comprehensive biosecurity plan should be agreed with the LLTNPA. This should be secured by a planning condition of any consent and be required prior to the commencement of development. This should include a registry of potential threat species and appropriate mitigation and decontamination procedures in place as soon as possible, followed up with a surveillance programme to detect any further contamination by INNS.

If you require any further clarification on any of the points raised here please do not hesitate to contact me on the email address below.

Yours Sincerely,

Owen Selly
Conservation Officer, RSPB Scotland
owen.selly@rspb.org.uk

⁴ <https://sitelink.nature.scot/site/8531>