

## **PE1812/I**

Dr Alison Stewart, Woodland Under Threat Detector, Woodland Trust submission of 20 November 2020

Ancient and long-established woodland is irreplaceable; once lost it cannot be recreated or replaced. Any development resulting in damage or loss to these valuable habitats is inappropriate and must be avoided.

At first sight it would appear as if the Scottish Government supports this view. The Control of Woodland Removal Policy states that: "There will be a strong presumption against removing the following types of woodland: ancient semi-natural woodland; woodlands listed as 'Plantations on Ancient Woodland Sites' (PAWS). There will also be a strong presumption against woodland removal where it would lead to fragmentation or disconnection of important forest habitat networks."

Paragraph 218 in Scottish Planning Policy also supports the Control of Woodland Removal Policy stating that "Removal should only be permitted where it would achieve significant and clearly defined additional public benefits. Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the Control of Woodland Removal Policy, and this should be taken into account when preparing development plans and determining planning applications."

However, despite this, planning permission is still too often granted for developments which either lie on, or could have a negative impact on adjacent ancient woodland sites. In some cases, indirect threats may be compensated for by conditions requesting the planting of new trees. However, it will take many decades before any new woodland supports the rich biodiversity found in ancient sites which have unique and complex communities of plants, fungi, insects and other microorganisms that have formed in specific conditions over a long period of time. Ancient woodland is not just about trees - the whole habitat is important including the soils, plants, fungi, insects which have developed and operate in harmony to create one of the most valuable biodiverse habitats. It is not only inappropriate development that threatens our ancient woodland; loss or damage due to conifer plantations, overgrazing and the spread of invasive species like rhododendron ponticum, also have a massive detrimental impact and need tighter controls.

Ancient woodland not only plays an important role in supporting biodiversity but also in tackling climate change. The SNP's website states that "Forests and woodlands are a natural powerhouse and among Scotland's most valuable rural assets. Our ambition is for them to expand and flourish. Growing our forests is also key to tackling the climate emergency we are facing. Currently, around 12 million tonnes of CO<sub>2</sub> are absorbed by Scotland's forests every year, and increasing the size of our forests and woodlands means we can store even more greenhouse gases." This is

backed up by the Scottish Government ambitious tree planting targets, currently 18,000 hectares per year<sup>1</sup>, but surely it is equally important not to destroy the woodland we already have. Ancient woodlands act as carbon sinks and their destruction will release carbon back into the environment, neutralising(/counteracting) the benefit of tree planting.

In my role as a Woodland Under Threat detector for the Woodland Trust, I rely on the current Ancient Woodland Inventory held by NatureScot (formerly known as SNH) and the Native Woodland Survey for Scotland, to determine if any of these important habitats are at risk. As already pointed out in the submission by the Woodland Trust (dated 16th September), the Inventory is incomplete and in desperate need of an update to help identify and locate different types of woodland. If this is not done it would be difficult to ensure the preservation of our ancient woodlands even if protective legislation was put in place.

I fully endorse the petition put forward by Help Trees Help Us and urge that the Committee recommend to the Scottish Government that ancient woodland needs to be afforded better protection. Ancient woodlands are an important part of our natural heritage, which in addition to acting as a carbon sink and biodiverse ecosystem, also have a positive impact of our health and wellbeing. Please provide ancient woodland with the protection it deserves: for climate, for nature and for people.

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<sup>1</sup> The Programme for Government (1st Sep) By 2024 the tree planting and woodland creation target is to reach 18,000ha (it was 15,000ha previously, to be reached in a stepped increase, so to reach 18,000ha/year by 2024).