

# AGENDA ITEM 8

## APPENDIX I

2014/0205/DET

# REPRESENTATIONS



# WOODLAND TRUST

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11<sup>th</sup> August 2014

Dear Mr O'Connor

**Re. Planning Application reference 2014/0205/DET**

**Proposal: Installation Of A Micro-Hydro Electric Turbine including Intake, Turbine House and Buried Pipeline - Re-Application |**

Thank you for the opportunity to comment on this application. The Woodland Trust is the UK's leading woodland conservation charity. The Woodland Trust Scotland owns 80 sites throughout Scotland totalling 8,500 hectares. The vision of the Woodland Trust Scotland is to rejuvenate Scotland's landscape by doubling native woodland cover over the next 50 years, with activity focussed in areas adjacent to communities or where buffering and expanding of ancient woodland and other semi-natural habitats can effectively be achieved.

The Trust **objects** to planning permission being granted for this application as it results in damage to ancient woodland.

A significant area of the site is listed in Scottish Natural Heritage's Ancient Woodland Inventory (AWI). This means that it is on the first edition ordnance survey maps. It has been designated in the AWI as "2a ancient of semi natural origin"; semi natural woodland has developed naturally on undisturbed soils. The site has, more recently, been classed by the Forestry Commission's Native Woodland Survey of Scotland (NWSS) as being a plantation on ancient woodland site (PAWS). PAWS are ancient woods that have been replanted with non-native species. Even dense conifers on ancient woodland sites may contain remnant features and relict ground flora which can be restored with careful management. The soil on the site has been undisturbed for a long time and has the potential to be restored to semi natural woodland. On both ASNW and PAWS sites features of ancient woodland often survive including characteristic wildlife and structures of archaeological interest. The interactions between plants, animals, soils, climate and people are unique and have developed over hundreds, and often thousands of years. Our remaining PAWS and semi-natural ancient woodland is **irreplaceable**. It is therefore essential that this habitat is protected from development.

Scottish Planning Policy (SPP) paragraph 146 states that "ancient and semi-natural woodland is an important and irreplaceable national resource that should be protected and enhanced, as should other native and long established woodlands with high nature conservation value. The Scottish Forestry Strategy identifies the protection of woodland of high biodiversity value as an important consideration in the development management

process. It also states that "the remaining ancient semi-natural woodlands have a high conservation priority".

The UK Forestry Standard sets out the UK Government's approach to sustainable forestry. It states that "Ancient Semi-natural Woods...are of special value". The Standard has a series of UK-wide aims for semi-natural woodland and states, "The area occupied by semi-natural woodland should not be reduced". The Standard goes on to discuss the importance of expanding and linking small woods to others and recognises that fragmentation of semi-natural woodland is a problem.

Forestry Commission Policy on Control of Woodland Removal states that there is a strong presumption against removing many types of woodland including: ancient and semi natural woods as well as areas supporting priority habitats and species listed in the UK BAP and plantations on ancient woodland sites.

Within the Cairngorm National Park's Forest and Woodland Framework ("The Forests of the Cairngorms"), section 3.1 sets out the priorities, which includes: c) **"Protect all ancient and semi-natural woodlands from further damage and fragmentation and restore them all in plantations on ancient woodland sites (PAWS)"**.

In addition, within Section 4.6 the following is included as one of the Cairngorms LBAP aims and objectives relating to woodland management: **"Maintain the extent and habitat quality of all ancient and semi-natural broadleaved woodlands and expand broadleaved woodlands, particularly with new native woodlands linked to existing woods"**

The Cairngorm National Park Local Plan states in Policy 3.90 "The Cairngorms National Park has a rich diversity of soils, from the agricultural soils, to undisturbed patterns of often fragile soils extending under ancient woodland, moorland, mountain slopes and summits. **Most forms of development and change in land use will disturb soils and affect their physical, chemical and biological characteristics. All developments must carefully consider their impact on this valuable resource"**.

Policy 13 (B) states that..."**All development must avoid unnecessary disturbance of soils, peat and any associated vegetation. Where disturbance is necessary, best practice must be adopted in their movement, storage, management and reinstatement.**

The proposed development directly contravenes policies 3.90 and 13 (B) of the CNPA Local Plan.

The Trust appreciates that the applicant has considered the potential impacts of the proposal on the sensitive landscape and has set out measures to keep these impacts to a minimum. In addition, we note from the development proposals that there are plans to create areas of new native woodland as well as to encourage natural regeneration in currently adjacent, unwooded areas. We would welcome these plans if they were simply to expand existing areas of native woodland; however in this case we understand that the intention is in part to compensate for the impact on the adjacent ancient woodland. Ancient woodland is the product of centuries of habitat continuity and undisturbed soils. As such, its loss can not be mitigated for by creating new woodland - an irreplaceable habitat cannot, by definition be replaced.

Development may increase the fragmentation of this ancient semi-natural woodland by creating or increasing barriers to movement, or impacting on existing movement corridors between ancient woodland fragments, and ancient woods and nearby semi-natural habitats. Development may also cause disturbance by light, noise, trampling and other human activity. In addition, the cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation. As well as the woodland being included on Scottish Natural Heritage's Ancient Woodland Inventory, it has been identified as a **Forest Habitat Network (FHN) Core Area** by Forestry Commission Scotland and Forest Enterprise. Development of FHNs is a major aspiration outlined in the Scottish Forestry Strategy, to be achieved through the restoration and improvement of existing woodland and the incorporation of new planting. It is expected that in the longer term such measures will reverse the effects of fragmentation on woodland biodiversity. The inclusion of the woodland at Inchgrundle as a FHN core area highlights its high biodiversity value and important strategic position for maintaining connectivity of woodland habitats. The fact that this ancient woodland is relatively small and disconnected means that it is even more crucial that it is protected from any activity that may damage it or reduce its area.

**In summary we object to planning permission being granted due to the negative impact on ancient woodland.**

If you would like any clarification on any of the points raised please contact the trust on the above contact details.

I hope this information is useful to you and thank you for allowing us the opportunity to comment on this application.

Yours sincerely

Catherine de Vries  
Campaigning Team

(Ancient Woodland Threat detector Volunteer\*)

\* This is a volunteer network which is managed by the Woodland Trust; please contact Katharine Rist if you wish to discuss the contents of this letter or WoodWatch.