

**Woodland Trust Scotland response to Cairngorms National Park Post Main Issues Report: New Sites Consultation, September 2018**

Woodland Trust Scotland (WTS) welcomes the opportunity to give its views on the Post Main Issues Report: New Sites Consultation. This response is in addition to our consultation response to the Main Issues Report in March 2018.

The comments that follow are delivered on behalf of the United Kingdom's leading woodland conservation charity. We have four main aims:

- No further loss of ancient woodland
- Restoring and improving woodland biodiversity
- Increasing new native woodland creation
- Increasing people's understanding and enjoyment of woodland.

We own over 1,000 sites across the UK, covering approximately 26,000 hectares (ha). In Scotland we own and care for around 60 sites covering in excess of 9,500ha which include the 5,000ha Glen Finglas estate and significant holdings in Glenrothes and Livingston. The Woodland Trust has 500,000 members and supporters.

WTS is particularly concerned with ancient woodland protection, therefore, for the purpose of this consultation we will focus on the impact of the proposed site allocations on woodland present on the Ancient Woodland Inventory (AWI). Out of the additional site allocations proposed, there are two which are of particular concern for the Trust: Carr-Bridge Landmark Extension and Grantown-on-Spey Caravan Park Extension. These will be discussed further below, but first we will look at the policy provisions which would deem these site allocations as not acceptable.

Scottish Planning policy states the following:  
'Woodland

216. Ancient semi-natural woodland is an irreplaceable resource and, along with other woodlands, hedgerows and individual trees, especially veteran trees of high nature conservation and landscape value, should be protected from adverse impacts resulting from development. Tree Preservation Orders<sup>91</sup> can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest.

217. Where appropriate, planning authorities should seek opportunities to create new woodland and plant native trees in association with development. If a development would result in the severing or impairment of connectivity between important woodland habitats, workable mitigation measures should be identified and implemented, preferably linked to a wider green network (see also the section on green infrastructure).

218. The Scottish Government's Control of Woodland Removal Policy includes a presumption in favour of protecting woodland. 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.'

The Control of Woodland Removal Policy states the following:

'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.'

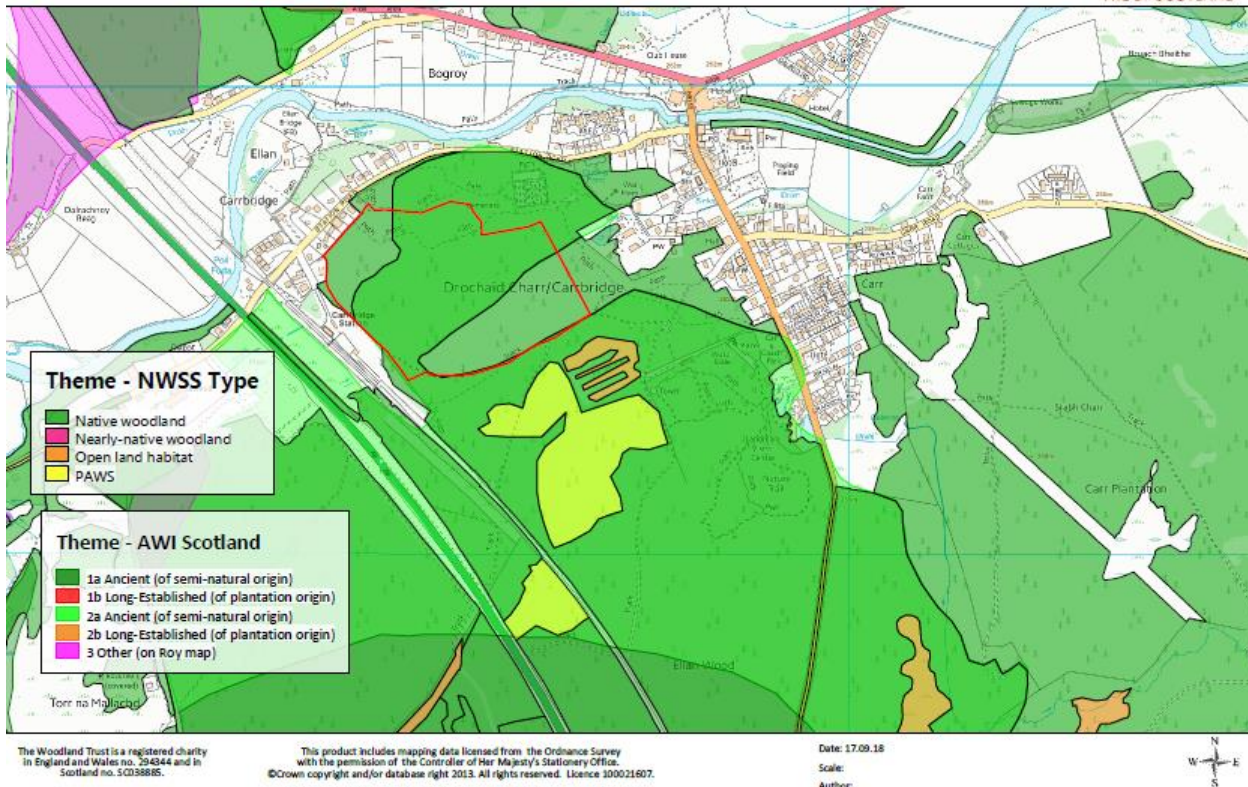
At national policy level there is a strong presumption against the removal of ancient semi-natural woodland, PAWS and high nature value woodland. Even if the proposed developments would result in minimal loss to trees, there would be additional impacts which are of concern:

- Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles.
- Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- It is particularly indicative of this type of development to have the unfortunate tendency for litter to be left in woodland; intensification of the recreational activity of humans and their pets also causes disturbance to the habitats of breeding birds and vegetation damage.
- There can be changes to the hydrology altering ground water and surface water quantities. Also the introduction of water run offs from development will result in changes to the characteristics and quality of the surface water as a result of pollution/contamination.

### **Carr-bridge: Landmark Extension**

#### **5. Proposed Extension to T1 Allocation: Landmark Forest Adventure Park**

The proposed extension to the T1 allocation together with the T1 allocation are on a large area of woodland identified as ancient semi-natural woodland on the AWI, with the core area marked as PAWS on the Native Woodland Survey of Scotland (NWSS). The northern boundary of the allocated site is also adjacent to our Woodland Trust site Glencarnoch woodland; the map below identifies our site boundary with a red outline, ancient, PAWS and native woodland. Development on this type of woodland is unacceptable.



Map showing Woodland Trust Scotland owned site boundary in red outline, ancient semi-natural woodland, PAWS and native woodland present.

In our MIR response from March 2018 we also objected to another allocated site at the boundary of our Glencarnoch woodland site: THC068. Our wording is 'We strongly object to this site being allocated for development - this is a Woodland Trust site and no permission will be given for housing development here. Furthermore, this site is an area of ASNW and development on this type of woodland is unacceptable. We support the view that this site is not preferred for development.'

Such site allocations would result in degradation of precious woodland habitat, and would be against many of the aims on the Park. Having an increase in people, dogs, activities, and parking immediately adjacent to a much smaller area of woodland bounded by development, roads and railway could place a huge amount of pressure on the biodiversity and infrastructure of the woodland, resulting in the degradation of the woodland habitat, conflicting with the CNPA's first and overarching aim 'To conserve and enhance the natural and cultural heritage of the area.' Currently distributed access by local people walking, horse riding, and mountain biking will be confined to a smaller area, increasing ground damage and the likelihood of conflict between user groups, as well as the loss of long established access routes and potential links to wider networks in the National Park, conflicting with the CNPA's third aim 'To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public.'

We are also expecting this area of woodland to experience direct loss and disturbance due to the expansion work of the A9. This work, in addition to the proposed allocations above, would lead to severe degradation of the habitat, as well as people's enjoyment of the area.

Furthermore, Carr-bridge has been selected as a pilot project area for the study of capercaillie, one of the priority species in the Park. Development in this area is likely to result in the loss of suitable habitat, and increased disturbance and fragmentation of existing woodland, making it highly undesirable for capercaillie, and could conflict directly with the Park's own aims of the capercaillie project in Carr-bridge.

For the reasons stated above, WTS **strongly objects** to this site being allocated for development.

### **Grantown-on-Spey: Caravan Park Extension**

#### **6. Proposed Extension to T1 allocation Grantown Caravan Park**

Both T1 and the proposed extension are allocated on an area of woodland which appears on the AWI as Long Established of Plantation Origin (LEPO) and as native on the NWSS. Therefore this woodland is of high nature value and should be protected from further development. The proposal on page 6 states that there is existing planning permission for the Caravan Park, however, we have not been able to locate this. We found a screening application for the extension (15/03154/SCRE) but no further planning applications in relation to the caravan park extension.

WTS **objects** to this site being allocated for development.

### **Conclusion**

In conclusion, WTS remains concerned about potential allocated sites in the Park being in conflict with some of the Park's aims. On 21<sup>st</sup> September 2018 we submitted a representation on the Nature Action Plan for the Park; while supportive of the action plan we noted that many of the aims there cannot be achieved if inappropriate sites continue to be allocated for development. We understand that the Park's vision is '*for an outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together*' but this has to be achieved in a responsible way, not at the expense of irreplaceable ancient woodland. The Park should lead the way in promoting development with both the health of people and the environment at its core, if nature and people are to thrive together.

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