

Woodland Trust Scotland response to Cairngorms National Park Authority, Proposed Local Development Plan, April 2019

Woodland Trust Scotland (WTS) welcome the opportunity to give its views on the Cairngorms National Park Authority Proposed Local Development Plan 2. We also responded to the Main Issues Report in spring 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 27,000 hectares (ha). In Scotland we own and care for around 60 sites covering in excess of 11,300ha which include the 5,000ha Glen Finglas estate and significant holdings in Glenrothes and Livingston. The Woodland Trust has 500,000 members and supporters.

- 1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc, your comment relates to)**

Policy 4 Natural Heritage, 4.1 International designations

- 2. What is your comment on this section of the Plan?**

4.1 International designations: the wording of clause 4.1 states that environmental concerns can be overridden by social and economic reasons. As currently worded this policy contradicts the statement in the introduction which states that where there is competing interest more weight will be given to enhancing and protecting the natural environment.

- 3. Please state clearly what change/s you wish to see made to the Plan to address your comment**

Change the wording of this policy so that it is in line with the main aim of the park which is to protect and enhance the natural environment.

- 1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc, your comment relates to)**

Policy 4 Natural Heritage, 4.3 Woodlands

- 2. What is your comment on this section of the Plan?**

WTS cannot fully support the wording as it is at the moment. Referring to sites present on the Ancient Woodland Inventory (AWI) only, rather than ancient woodland, is a limited approach

because the AWI is inaccurate and should be used as a guideline. SNH themselves advise that it is used as a guideline and we recommend that the planning authority consults the interpretation note on the AWI issued by SNH which states that the inventory is provisional:

<https://www.nature.scot/sites/default/files/2018-11/A%20guide%20to%20understanding%20the%20Scottish%20Ancient%20Woodland%20Inventory%20%28AWI%29.pdf>

The AWI is inaccurate for the following reasons:

- It is known that some ancient woodland sites have simply not been recorded on the inventory. Within the CNPA, the Woodland Trust has identified some examples and can make these available to the park authority.
- During the compilation process photocopy versions of historical maps were used which were of poor quality, therefore some sites marked on historical maps as continuously wooded for many hundreds of years have been left out
- Many of the woodland boundaries have been poorly digitised and this has resulted in minor discrepancies

Where it is suspected that the woodland area could be ancient, it is advised that all of the following mapping resources are checked: AWI, NWSS, historic OS maps 1840-60's (at six inches to the mile). These should all be used as a process for determining the presence and extent of ancient woodland. A woodland survey should also be conducted. Such assessments can help inform development management and developers. Therefore, this policy should refer to ancient woodland, rather than sites present on the AWI.

Since this plan was published, the Scottish Government also published its new Scottish Forestry Strategy which states that unnecessary loss of woodland, particularly ancient woodland, should be avoided. In paragraph 4.67, we welcome the statement recognising the value of ancient woodland, and the fact that it is irreplaceable. This fact should be reflected in the policy section as well.

The points raised above are very important for section 4.5 *Other biodiversity point b) Significant harm or disturbance to the ecological functions, continuity and integrity of the habitats or species populations is avoided or minimised where harm is unavoidable; and appropriate compensatory and/or management measures are provided; and new habitats of equal nature conservation value are created as appropriate to the site.* Ancient woodland loss cannot be compensated for, therefore compensatory measures do not apply to ancient woodland and other irreplaceable habitats. This should be clearly stated in this policy.

Particularly as this is a local development plan for a national park authority it should clearly state that there will be no further loss of ancient woodland and this approach should be applied to site allocations throughout the Park. While we appreciate the native woodland creation which has happened so far across the Park and further commitments made in the recently launched Forestry Strategy, it is vital that the park authority protects and enhances its ancient woodland resource and ensures that the planning system gives the appropriate protection to this irreplaceable habitat.

We note that the site-specific requirements for the site allocations require the integration of the existing woodland areas, particularly when ancient woodland is mentioned. This text should say 'buffering and integration' to clarify what is needed to protect these woodland areas. While this is welcomed as part of the site allocation site specific requirements it should also be included as part of the policy on woodlands to ensure that any future proposed developments outwith the plan are also required to adhere to this policy as a material consideration. We also noted some instances where ancient woodland is present on site or adjacent to a site allocation but not mentioned in the site-specific requirements. This has been noted in the site allocations assessments section. We also want to see 'structure tree planting' defined in the *Glossary* section, as well as the wording that native tree species will be favoured for this planting. At the moment we are uncertain regarding what is meant by structure planting.

3. Please state clearly what change/s you wish to see made to the Plan to address your comment

In summary we want to see the following in a robust policy on woodlands:

- There will be no further loss of ancient woodland and ancient woodland will be protected and enhanced
- Development likely to damage ancient woodland should be located away from the woodland area and an appropriate buffer area be established. The buffer area can be additional native tree planting. The WT can advise on buffer areas at the planning application stage when there are further details of the development proposed, but in general for major developments we would recommend a buffer of at least 50m.
- To determine the antiquity of a woodland area the following mapping resources and process will be used: the assessment should start by looking at the Ancient Woodland Inventory, then the historic OS maps 1840-60's (at six inches to the mile) should be revisited, and then the Native Woodland Survey of Scotland should be looked at to assess the presence of mature trees common in the canopy. A woodland survey could also be conducted where the antiquity of woodland is uncertain.
- In instances where compensatory planting is appropriate, native tree species should be specified as appropriate replacement
- Compensatory planting is not an appropriate mitigation measure for ancient woodland removal because by definition ancient woodland cannot be replaced.

1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc., your comment relates to)

Glossary: Ancient woodland and Ancient Woodland Inventory term descriptions

2. What is your comment on this section of the Plan?

The definition of ancient woodland is incorrect.

We consider that any woodland included in Scottish Natural Heritage's Ancient Woodland Inventory (or AWI), which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and long-established and is therefore worthy of further study and is likely to pose a constraint on development. We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which must be protected from damage, loss and fragmentation. As explained in the comments section for the Woodland policy, the AWI is not a comprehensive inventory, instead it provides a starting point for assessing the antiquity of woodland. Therefore defining ancient woodland as woodland recorded on the AWI is incorrect.

The Ancient Woodland Inventory for Scotland definition is incorrect.

We note that the wording used for this is in fact the summary of the inventory as listed on the data.gov.uk website. SNH suggests the following wording to more accurately describe the AWI:

The Ancient Woodland Inventory

The Ancient Woodland Inventory (AWI) is a PROVISIONAL guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value by virtue of their antiquity:

- i. Ancient Woodland (1a and 2a): Interpreted as semi-natural woodland from maps of 1750 (1a) or 1860 (2a) and continuously wooded to the present day. If planted with non-native species during the 20th century they are referred to as Plantations on Ancient Woodland

- Sites (PAWS).
- ii. Long-established woodlands of plantation origin (LEPO) (1b and 2b): Interpreted as plantation from maps of 1750 (1b) or 1860 (2b) and continuously wooded since. Many of these sites have developed semi-natural characteristics, especially the oldest ones, which may be as rich as Ancient Woodland.
 - iii. Other woodlands on 'Roy' woodland sites (3): Shown as un-wooded on the 1st edition maps but as woodland on the Roy maps. Such sites have, at most, had only a short break in continuity of woodland cover and may still retain features of Ancient Woodland.

We recommend that the CNPA consults SNH's interpretation note on the AWI which can be found here: <https://www.nature.scot/sites/default/files/2018-11/A%20guide%20to%20understanding%20the%20Scottish%20Ancient%20Woodland%20Inventory%20%28AWI%29.pdf>

3. Please state clearly what change/s you wish to see made to the Plan to address your comment

Define ancient woodland as follows: In Scotland, ancient woodland is defined as land that is currently wooded and has been continually wooded since at least 1750. Its age means that it is important for biodiversity and our cultural identity.

Add the wording:

Ancient Woods are important because:

- They include all remnants of Scotland's original woodland; their flora and fauna may preserve elements of the natural composition of the original Atlantic forests.
- They usually have much richer wildlife than that of more recent woods.
- They preserve the integrity of soil ecological processes and associated biodiversity.
- Some have been managed by traditional methods for centuries and demonstrate an enduring relationship between people and nature.
- Woods and veteran trees are ancient monuments whose value to the local community and historians may be as great as that of the older buildings in a parish.
- Once destroyed, they cannot be recreated.

Define the AWI for Scotland as follows:

The Ancient Woodland Inventory is a map-based tool that shows the location of many of our most valuable woodlands.

The Ancient Woodland Inventory (AWI) is a PROVISIONAL guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value by virtue of their antiquity:

- i. Ancient Woodland (1a and 2a): Interpreted as semi-natural woodland from maps of 1750 (1a) or 1860 (2a) and continuously wooded to the present day. If planted with non-native species during the 20th century they are referred to as Plantations on Ancient Woodland Sites (PAWS).
- ii. Long-established woodlands of plantation origin (LEPO) (1b and 2b): Interpreted as plantation from maps of 1750 (1b1) or 1860 (2b) and continuously wooded since. Many of these sites have developed semi-natural characteristics, especially the oldest ones, which may be as rich as Ancient Woodland.
- iii. Other woodlands on 'Roy' woodland sites (3) Shown as un-wooded on the 1st edition maps but as woodland on the Roy maps. Such sites have, at most, had only a short break in continuity of woodland cover and may still retain features of Ancient Woodland.

1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc., your comment relates to)

Settlement statements

2. What is your comment on this section of the Plan?

We note that the site-specific requirements for the site allocations require the integration of the existing woodland areas, particularly when ancient woodland is mentioned. This text should say 'buffering and integration' to clarify what is needed to protect these woodland areas. While this is welcomed as part of the site allocation site specific requirements it should also be included as part of the policy on woodlands to ensure that any future proposed developments outwith the plan are also required to adhere to this policy as a material consideration. We also noted some instances where ancient woodland is present on site or adjacent to a site allocation but not mentioned in the site-specific requirements. This has been noted in the site allocations assessments section. We also want to see 'structure tree planting' defined in the glossary of terms, as well as the wording that native tree species will be favoured for this planting.

We are overall concerned with fragmentation of both native and ancient woodland within the park, due to on-going permitted developments. The Scottish Government's SPP states that the planning system should '*seek benefits for biodiversity from new development where possible, including the restoration of degraded habitats and the avoidance of further fragmentation or isolation of habitats*'; Cases where woodland has been felled in anticipation of planning permission have been brought to our attention, therefore it is all the more important that policies within this plan are robust and able to translate into protection of woodland, as well as other habitats on the ground.

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The instances where ancient woodland is identified on site or adjacent to a site need to be consistent and need to be mentioned in the site specific requirements in order to raise awareness of the existence of this habitat in or around a development site. Ancient woodland is irreplaceable and there is a strong presumption in favour of protecting this from direct and indirect impacts from development, therefore it is likely to pose constraints on development.

Our site allocation assessments are in Annex 1 below with suggested changes we wish to see made.

Annex 1: Settlement statements

Site reference no.	Name/description of site	Proposed development/use and number of units	Woodland affected Location in relation to the allocated site Comments and recommendation
Aviemore			
M1	Aviemore highland resort	Mixed use, hotels, enhance existing development, housing, retail, recreation, employment	We have identified 7.11ha of ancient woodland (identified as ancient semi-natural woodland on the AWI), part of Spey SAC which the plan acknowledges will be affected. The current wording does not acknowledge the presence of ancient woodland in the south of the site allocation. WTS would not support any development on this area of woodland which should be protected and enhanced. Wording in the landscape section must mention presence of ancient woodland on site and the need to safeguard this, as it has been done in other instances throughout the plan. The area of ancient woodland to the south of the site should be excluded from the development with a specific requirement to protect this.
LTH1 and 2	North Aviemore Long term housing	Residential, 400 units	The text acknowledges that there is ancient woodland at the north of the site which is a good step. We have identified 18ha of ancient woodland present on both the AWI and NWSS. The site allocation seems to stop at the edge of the woodland but we would seek assurances that the areas of woodland would be buffered - additional planting as suggested in the text is welcomed as well as the retention of the existing woodland on site. The woodland within the site allocation could have been too small for surveying as part of the AWI and NWSS so we are unsure of its ecological value. If its retention is questioned then evidence needs to be provided of its value because if this is ancient woodland then any development proposals should protect this woodland area.
ED1	Dalfaber industrial estate	Economic development	We have identified 23 ha of ancient woodland, shown on the AWI, to the north of the site. This should be mentioned in the site allocation text as it is in the allocations above. It is unclear at the moment if this site would affect the ancient woodland area at all but we recommend that this allocation leaves a buffer area between the woodland and the development.
ED3	Granish	Economic development	We are pleased that the ancient woodland to the north of the site is identified in the wording. The wording in the site-specific requirements should be <i>'landscaping and structure planting will be required to ensure buffering and integration of the development with the surrounding landscape and ancient woodland adjacent to the site. The ancient woodland area in particular must be protected from potential impacts of economic development for this site.'</i>

	An Camas Mòr	Residential 1500 units	The WT objects to this site being allocated for development as proposed due to the impact on ancient woodland. The plan says that this site is 0.7ha - we're uncertain that this is accurate. The wording on landscaping on p. 102 identified the ancient woodland to the north of the site. This is also inaccurate as the ancient woodland is a significant part of the initial site allocation and it is part of a wider woodland network. To clarify there is ancient woodland in the eastern part of this site, and extends to the north of the site and beyond. The AWI, NWSS and OS six-inch maps available from the National Library of Scotland should be consulted to assess the extent of the ancient woodland on site.
Ballater			
H1	Monaltrie park	Housing, 250 units	We welcome the requirement to retain the woodland.
Grantown on Spey			
H2	Castle road	Housing, 500 units	Identified on settlement map as H1 (there are two H1 site allocations) and image of settlement boundary missing from site allocation on page 112. From the allocation on the settlement map we note that there is ancient woodland identified on both the AWI and the NWSS to the north of the site. The wording in the site specific requirements states that additional landscaping and structure planting will be required to integrate the development with the ancient woodland to the north of the site - we are not sure what is meant by this and suggest that the wording mentions ancient woodland protection in addition to integration.
T1	Caravan park	Tourism	We have identified woodland present on the AWI and on the NWSS within the site allocation, as well as adjacent to this. The site specific requirements state that landscaping and structure planting will be required to integrate the development with the ancient woodland, however, for the purpose of protecting the ancient woodland the site allocation boundary should exclude the ancient woodland area.
Kingussie			
H1	Land between Ardbroilach Road and Araig an Darach	Housing 300 units, 19.6 ha	We have identified woodland present on the AWI and the NWSS along the northern boundary of this site. This woodland area must be buffered from the proposed development so we recommend that the site specific requirements say 'landscaping and structure planting will be required to ensure buffering of the ancient woodland area from the development.
T1	Kingussie golf club caravan park	2.7 ha allocated for tourism	The site is surrounded by woodland areas identified on the AWI and on the NWSS. The site allocation is shown on top of ancient woodland to the south and would most likely impact the woodland area through direct loss and negative edge effects. We do not support this site allocation and recommend that this is removed from the LDP.
Blair Atholl			
T1	Blair castle caravan park	Tourism	The site allocation has LEPO woodland identified on the AWI to the north of the site. This woodland area can provide a scenic backdrop to the caravan park site and should therefore be protected and enhanced. This should be mentioned in the site-specific requirements.
Carr-bridge: this is also an area identified for the capercaillie project so development as proposed is competing with this project			
H1	Carr road	Housing 36 units	We very much welcome the requirement for the provision of a comprehensive tree structure across the whole area which is to include street and garden trees. This is very much welcomed, and it should be done in a way which protects and enhances the woodland area which is adjacent to the south of the site. This woodland area appears on the NWSS and also on the historical OS six-inch maps and could therefore contain ancient woodland features. If this is the case then the woodland area should be protected and enhanced. A further

			survey should be carried out to help inform appropriate development management.
H2	Crannich park	Housing 23 units 1.2ha	The south of this site allocation is adjacent to an area of ancient woodland present on the AWI and the east of the site is adjacent to woodland present on the NWSS. There should be a provision in the site-specific requirements to protect the woodland areas and buffer them from potential negative edge effects.
ED1	Land at railway station	Economic development	This site allocation is adjacent to Woodland Trust owned woodland site, Glencharnoch woodland. This woodland is ancient woodland and should therefore be protected from the negative impacts of development. The site allocation ED1 should contain a provision to protect the woodland area through an appropriate buffer area. We are unclear what development would take place here but understand that this site is allocated for development of economic activity.
ED3	Former sawmill	Economic development 3.7ha	This site is surrounded by ancient woodland present on the AWI on all sides except the north. This should be recognised in the site-specific requirements alongside the need to protect the woodland area from potential negative edge effects. This can be done through a buffer between any development and the ancient woodland area. This former sawmill site is a newly discovered area for one of the Rare Invertebrates in the Cairngorms priority species, Kentish glory. To help with the conservation of this species retention of, and management to encourage young birch on this site is recommended, working in partnership with Butterfly Conservation and the Rare Invertebrates in the Cairngorms Project Officer.
T1	Landmark forest adventure park	Tourism	This site is allocated on an area of ancient woodland, identified as such on the AWI and it also borders our woodland trust site Glencharnoch. The presence of ancient woodland should be mentioned in the site specific requirements. We welcome the requirement for development here to be designed to minimise the impact on the woodland area. The Woodland Trust can offer advice for the protection of this ancient woodland and would be happy to engage in any further development process.
Kincaid			
H1	Opposite school	40 units 5.1ha	Native woodland to the north-east of the site so best that structural planting is with native species to ensure appropriate integration.
Nethy-Bridge: we welcome that the native and ancient woodland areas inside the settlement boundary are designated as protected open space.			
Dinnet			
H1	Land to east	Housing 15 units	This site is allocated on an area of woodland identified on the NWSS. This site is part of a wider woodland area and would cause further fragmentation of this habitat and would contravene the Scottish Government's Policy on Control of Woodland Removal and the Scottish Planning Policy (SPP) which state that there is a strong presumption against the fragmentation of woodland habitat. The WT does not support the allocation of this site for development in the LDP.
Glenmore			

T1	Camping site	Tourism	This site is surrounded by ancient woodland present on the AWI on all sides except the west and by woodland present on the NWSS to the south and east. We suspect the whole woodland area to be ancient woodland in reality. Any further development should not result in damage to the woodland area, be it direct loss or negative edge effects. The site-specific requirements should also recognise the presence of ancient and native woodland around the site and the need to protect and enhance these areas. The woodland trust can offer advice for the protection of this ancient woodland and would be happy to engage in any further development process.
T2	Glenmore lodge	Tourism	This site is also surrounded by woodland present on the AWI and the NWSS therefore development should be confined to the current developed area and aim to protect and enhance the surrounding woodland. The Woodland Trust can offer advice for the protection of this ancient woodland and would be happy to engage in any further development process. The presence of ancient woodland on and around the site should be mentioned in the site specific information. The presence of ancient woodland on and around the site should be mentioned in the site-specific information.
Inverduie & Coylumbridge			
T1	Camping site	Tourism	This site allocation already contains development as a camping site however this is part of a large area of ancient woodland shown on the AWI and on the NWSS. If any development does take place here this must be confined within the already developed area and designed in a sympathetic way to minimise potential negative effects to the woodland area. The woodland trust can offer advice for the protection of this ancient woodland and would be happy to engage in any further development process. The presence of ancient woodland on and around the site should be mentioned in the site-specific information.

Contact details:




