

Woodland Trust Scotland response to Cairngorms National Park Economic Action Plan

Woodland Trust Scotland (WTS) welcome the opportunity to give our views on this consultation.

The comments that follow are delivered on behalf of UK's leading woodland conservation charity. We have four main aims: ensuring no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland creation and 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 urban forestry holdings in Glenrothes and Livingston. We combine the promotion of public access with forestry, farming and conservation of the natural and cultural heritage. The Woodland Trust has 500,000 members and supporters.

Q1: Are there other significant economic trends, challenges, opportunities or data sources that we should be taking into account when developing this Economic Action Plan?

We think that the factors identified are comprehensive enough, however, the climate change and loss of biodiversity one has a greater bearing on the Action Plan than the other factors and this needs to be considered seriously. Below we have also suggested additional considerations for some of other factors.

Climate change and loss of biodiversity: we welcome that these are presented together as twin challenges; climate change is the main cause of biodiversity decline. Unfortunately we do not think that the climate and biodiversity emergency context is being given enough prominence in this Action Plan. As is recognised by the Parks aims, the CNPA must give greater weight to the first aim: the environment underpins the economic activity in the Park. In an emergency context, climate change and biodiversity need to feature more strongly in the plan and guide economic activity not facilitating environmental destruction, and away from business as usual.

A place to invest: Landscape-scale projects to create fully functioning ecosystems are underway in the Park and have been successful at securing private investment. We'd like to see an action in this plan around the opportunity to facilitate further such economic investment in the natural environment in the Park.

Availability and use of data: in this section data available for the Park's natural environment should also be mentioned. It is important to have good data as evidence base for decision-making. For example, it is of great concern to the Trust that the data available on the Park's ancient woodlands is very poor in the Ancient Woodland Inventory for Scotland. We have come across a number of discrepancies in the AWI and on the ground which are concerning especially from a development management point of view where decisions on development are made on the basis that the AWI does not class certain woodlands as ancient when in fact they are. Better inventory data can help map out

and protect the ancient woodlands in the Park to help inform the management of these irreplaceable habitats.

Q2: Do you support these actions to deliver the economic strategy as set out in the Cairngorms National Park Partnership Plan? Please explain why.

Many of the actions listed here are out-with the Trust's remit and expertise so it would be difficult for us to comment on all the actions. We will focus on a few of the actions for the purpose of this response.

Priority theme 1: Building on the economic strengths of the Park

Forestry: we are delighted to be working in partnership with the Park and to provide funding for the pilot scheme mentioned in this Plan. The woods in the Park underpin some of the economic activity around tourism and forestry and are therefore very important to these sectors. We understand that there are plans under way in the Park to continue to increase the native woodland cover, and this makes a significant contribution to the national average of native woodland, and to the Scottish Biodiversity Strategy targets. As well as new woodland creation, it important to look after the woods we have, particularly ancient woodlands which are home to a tremendous amount of biodiversity. Economic activity in the Park should not happen at the expense of ancient woodland.

Agriculture: We fully support this approach. Through Scottish Environment LINK the Trust has been asking for the Land Use Strategy to be better implemented and resourced. We will continue to lobby for the land use pilots which have taken place in the Borders and in Aberdeenshire to be rolled out across Scotland. In the climate emergency context regionalized land use is all the more important, as has now been recognized in the Programme for Government. Future support for land management in the Park and across Scotland should also be allocated on a 'public money for public goods' basis.

Priority Theme 4: Infrastructure and capital investment

Some of the capital investment priorities could have a negative impact on ancient woodland in the Park. Below we will discuss the known impacts for some of them. We would like to see in this Plan and action for economic activity in the Park to not have a negative effect on biodiversity.

A9 dualling: we have been responding to the consultations on the proposed routes for the different stages of this project. The Trust is advocating for the best possible routes in terms of impact to ancient woodland should be chosen to help preserve these habitats which are very important for biodiversity.

Further development of Macdonald Aviemore Highland Resort: as allocated in the Local Development Plan the proposed resort development could threaten an area of ancient woodland. In the Local Development Plan the area of ancient woodland should be excluded from the site allocation with a site specific requirement to protect this.

Q3: Are these delivery and monitoring arrangements appropriate for the economic action plan? Please explain why.

This section sets our arrangements for delivery but there is very little detail on monitoring. It is unclear from this section how the success of this strategy will be measured. The proposed annual review should report against a set of indicators which should be set out in this action plan.

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