

PE1812/N

Heads of Planning Scotland submission of 16 December 2020

It is considered that the proposed petition has merit as ancient, native and semi-native woodlands are a finite resource and are constantly and increasingly under threat from development and land management pressures.

The climate emergency recognises the importance of woodlands to combatting climate change and any legislation that protects this resource from incremental destruction should be a priority for the Scottish Government (and UK Government). The Woodland Trust's submission *'that ancient woodland needs to be afforded better protection, and the next best opportunity to do this is to strengthen planning policies in the National Planning Framework 4, and to address the other threats of overgrazing and invasive species, and that adequate grant schemes should be made available to land managers.'* is a sensible suggestion.

It is accepted that Scottish Planning Policy already seeks to protect ancient woodlands and many local authorities have Local Development Plan policies that are robust, so there would be a presumption against development of ancient woodland sites. Full legal protection would strengthen this position. It would need to be clear that any legal protection, if required, would need to address any non-development related pressures such as grazing, felling and pollution. It would put ancient woodlands on a similar standing to SSSIs but then, what about other important habitats e.g. species rich grassland, peatlands etc?

There is a significant question regarding who would be the regulatory authority for this new statutory provision, candidates for this role may be Scottish Forestry or NatureScot. It is not considered appropriate or sustainable that this responsibility falls to Local Authorities.

Specific national legal protection for Scotland's remaining ancient, native and semi-native woodlands and woodland floors would be a long overdue start. This is a land use issue, not simply a developmental issue, and as long as there is an 'anything goes' approach to that, then short of (properly enforced) statutory protection these assets will remain at risk and continue to be degraded.

**Sent on behalf of
Heads of Planning Scotland: Climate Change, Energy and Resources Sub-committee**