

PE1812/E

John Muir Trust submission of 19 November 2020

We write in support of the above petition, which asks for legislation to protect the remaining fragments of ancient, native and semi-native woodlands and woodland floors in Scotland before COP26 (UN Climate Change Conference of the Parties) in Glasgow in November 2021.

In a time of climate and biodiversity crisis, Scotland remains one of the most heavily deforested countries in Europe, with woodland cover well below the current European average of 37% and just under a quarter of Scotland's woodland considered native. In this context, protecting what remains of ancient, native and semi-native woodlands is all the more significant. Legal protection could help connect fragmented and isolated woodlands, with resulting gains for biodiversity as Scotland's ancient and native woodland ecosystems are known to support some of the world's rarest lichens and bryophytes. Whilst ambitious tree planting programmes are to be commended, protecting what we have and enabling our wild woods to regenerate can be a less costly approach that strengthens the overall resilience of a woodland.

Current Scottish Planning policy includes a principle that the planning system should 'protect and enhance ancient semi-natural woodland as an important and irreplaceable resource'. However, we continue to see preferred route options for new or upgraded power lines proposed through native and ancient woodland habitats. This month we became aware of the Bhlairidh Extension Wind Farm Grid Connection proposal with a preferred route that would go through ancient woodland (category 1a and 2a on the Ancient Woodland Inventory) and the Dunoon 132kV overhead line rebuild project with numerous areas of Ancient Woodland Inventory woodland, native woodland and near-native woodland habitats present along all route options. Whilst upgrading overhead power lines are important projects for securing energy supply to communities and grid connections are part of the infrastructure we need to decarbonise, Scotland's ancient woodlands are a finite, once lost, forever lost, habitat that built development should seek to avoid.

In addition to infrastructure development, another threat to ancient woodland is Scotland's unsustainable deer population. As part of our work, the John Muir Trust looks after ancient Ardvar woodlands on our Quinag property, and we also manage remnants of Scotland's rainforest (also known as Atlantic woodland or Celtic rainforest; a globally rare and internationally important native woodland habitat found on Scotland's west coast) on our Skye, Knoydart and Nevis properties. The ancient Ardvar woodlands at Quinag are a Special Area of Conservation and Site of Special Scientific Interest. We are working to give them a chance to expand naturally through deer management, however, the effectiveness of our deer management is constrained by deer management approaches elsewhere. With members of Scottish Environment LINK, we are asking the Scottish Government to implement the changes proposed by the independent Deer Working Group

as a matter of urgency through a new Deer Act, so that deer are managed sustainably in the public interest.

Legislation to protect ancient, native and semi-native woodlands and woodland floors would be an opportunity to strengthen the level of protection for these woodlands by addressing the different, compounding land use threats from over-grazing, inappropriate development, commercial conifer plantations, invasive species such as rhododendron and diseases like ash dieback. This legislation could be part of a suite of new legislation for climate and biodiversity ahead of COP26 that could include a new Deer Act. In the meantime, the fourth National Planning Framework (NPF4), with a draft expected to be placed before Parliament in September 2021, provides an opportunity to require careful siting of new development and a presumption to avoid development that fragments or destroys ancient, native and semi-native woodlands.

Given that Scotland's woodlands support public health, store carbon, help to sustain and can be key to improving biodiversity, the present time of climate and biodiversity crisis is a time to step up their protection in a meaningful, joined-up and enforceable way.