

Scottish Borders Council
Newtown St Boswells
Melrose
TD6 0SA

27th May 2021

Dear Paul Duncan,

Application: 21/00624/PPP

Proposal: Erection of dwellinghouse | Land East Of Renton Bush Reston Scottish Borders

Objection – direct loss to Green Wood

The Woodland Trust is the 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 4,000ha 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. We have over 500,000 members and supporters.

Loss of Ancient Woodland

The Trust **objects** to planning application 21/00624/PPP on the basis of potential further damage to Green Wood (grid ref: NT8345864112), an Ancient woodland of Semi-Natural Origin (ASNO) designated on the Ancient Woodland Inventory (AWI).

NatureScot's Ancient Woodland Inventory¹ has three main categories of woodland, all of which are of value for their biodiversity and cultural value by virtue of their antiquity:

- **Ancient Woodland (1a or 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).

¹ <https://www.nature.scot/sites/default/files/2018-11/A%20guide%20to%20understanding%20the%20Scottish%20Ancient%20Woodland%20Inventory%20%28AWI%29.pdf>

- **Long Established of Plantation Origin (1b or 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.
- **Other woodlands on 'Roy' woodland sites (3)** - Shown as unwooded 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.

Planning Policy

The removal of woodland is contrary to two important pieces of Scottish Government policy; the Scottish Planning Policy (SPP) and the Control of Woodland Removal Policy.

The SPP states: *"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 can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest."*

"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: *"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."*

The Scottish Biodiversity Strategy (SBS), "It's in Your Hands" includes the following target and action: *"Target 3.3 Minimise losses of biodiversity occurring through fragmentation and loss of woodland due to development and other land uses."*

In addition to this, in February 2019 the Scottish Government published its Forestry Strategy 2019-2029 which states that² unnecessary loss of woodland, **particularly ancient woodland, should be avoided.**

² (page 30) - <https://www.gov.scot/publications/scotlands-forestry-strategy-20192029/pages/7/>

The Council should also have regard for **Policy EP13 (Trees, Woodlands and Hedgerows)** of the **Scottish Borders Council Local Development Plan (2016)** with respect to the protection of ancient woodland.

Impacts to Ancient Woodland

The Woodland Trust previously objected to retrospective application 18/00518/FUL which had resulted in the loss of ancient woodland at this location, and therefore we acknowledge that part of the ancient woodland on site has been previously removed.

However, given the site's important biodiversity value, the ancient woodland area should be allowed to re-generate and/or be re-stocked with local provenance trees, rather than permanent loss of habitat through the development of a residential dwelling at this location.

Conclusion

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Trust **objects** to this proposal due to impact to Green Wood.

If you would like clarification of any of the points raised above, then please do not hesitate to contact us via campaigning@woodlandtrust.org.uk.

Yours sincerely,

Nicole Hillier
Campaigner – Woods under Threat