



Development Planning  
West Lothian Council  
County Buildings  
High Street  
Linlithgow  
West Lothian  
EH49 7EZ

17<sup>th</sup> October 2014

Dear Sir/Madam,

**Main Issues Report  
West Lothian Local Development Plan**

The Woodland Trust Scotland (WTS) is pleased to be able to comment on the Main Issues Report for West Lothian and values the opportunity to have its comments taken into account.

The comments that follow are delivered on behalf of the United Kingdom's leading woodland conservation charity. We achieve our purposes through acquiring woodland sites for woodland regeneration, and wider advocacy of the importance of protecting ancient woodland, enhancing its biodiversity, expanding native woodland cover and increasing public enjoyment. We own over 1,000 sites across the UK, covering approximately 20,000 hectares (ha). In Scotland we own and manage over 80 sites across 8,500 ha which include the 4,000 ha Glen Finglas estate and significant holdings in Glenrothes and Livingston. We have three main aims:

- To enable to creation of more native woods and places rich in trees
- To protect native woods, trees and their wildlife for the future
- To inspire everyone to enjoy and value woods and trees.
- 

Alongside these aims, it is imperative that Local Development Plans ensure ancient woodland is protected. Ancient Woodland in Scotland is defined as an area that has been continuously wooded since at least 1750 AD and is a nationally important and threatened habitat. A rich habitat for wildlife, it is home to more species of conservation concern than any other terrestrial habitat. Ancient woodland sites are irreplaceable – the continuity of woodland has preserved historical and ecological features in a unique way. It is essential that this habitat is protected from development.

West Lothian's Main Issues Report (MIR) recognises the importance of the natural environment to the area, and sets out a sustainable vision for development, which includes the protection and enhancement of green networks and a commitment to tackling climate change. The vision statement is clear, with a strong emphasis on these

The Woodland Trust  
Scotland  
South Inch Business Centre  
Shore Road  
Perth  
PH2 89W  
**Telephone**  
01738 635544  
**Facsimile**  
01738 629391  
**Website**  
[woodlandtrust.org.uk](http://woodlandtrust.org.uk)

objectives. It is important that these be upheld for every development put forward in the Local Development Plan, as West Lothian has clear potential for large areas of development due to the proximities of Edinburgh and Glasgow. It is imperative, therefore, that green networks and natural areas are protected, and urban sprawl be kept in check.

Whilst the vision statement is strong, the main body of the document is often found lacking in key areas. Sustainability and protection of natural areas need to feature in every section of the main issues, and this is often not the case. Woodland must also be much better represented at every stage. Below we outline a series of recommendations for the West Lothian MIR in order to ensure that all development recognises the importance that woodlands, green spaces and biodiversity bring to the area.

### Ancient Woodland Protection

The MIR expands on the previous documents of the Strategic Development Plan (SDP) and the West Lothian Local Plan (WLLP). Whilst the MIR upholds all the key areas of the SDP, policies pertaining to woodlands and policy are under review, and have the potential to be combined into one policy. This would only be acceptable to the WTS if all relevant detail that protects woodland from development were retained, and would also recommend that more detail be added. None of policies ENV10 – ENV13 mention native or ancient woodland. The WLLP mentions how little semi-natural native woodlands remain in West Lothian, therefore it is imperative that what there is must be protected from development; and the MIR makes no mention whatsoever of ancient woodland. It is also important to protect all native woodland of local significance and not those areas protected under Areas of Great Landscape Value and Areas of Special Landscape Control. The WTS recommends a robust environmental policy on woodland, with clear guidelines for protecting native and semi-natural native woodland above all development, and align policies with The Scottish Planning Policy, which states, **“Ancient and semi-natural woodland is an important and irreplaceable national resource that should be protected and enhanced”**.

We would like to see the following included in the MIR, and ultimately the LDP:

- Recognition of the importance of ancient woodland, ancient trees, veteran trees, other trees of special interest and Planted Ancient Woodland Sites (PAWS), including the urgent requirement to ensure they are protected from development
- A clear statement recognising that the loss of ancient woodland cannot be mitigated for. Woodland habitats take many years to develop and planting new woodland in place of cleared, ancient, native or semi-native woodland is not acceptable mitigation. Rather, new native woodland creation around existing woodland will help secure woods of high conservation value and can contribute to habitat expansion.
- A clear definition of ‘open’ and ‘green’ space, which should include woodland areas, as well as the inclusion of woods in a list of green spaces that will not be granted planning permission.
- Developments likely to cause disturbance should be located away from ancient or semi-natural woodland, particularly those likely to modify local hydrological function. Where development is located near to ancient or highly bio-diverse woodland, buffer zones should be retained to reduce the distance that disturbance penetrates.

- Align environmental policies with The Scottish Forestry Strategy, which identifies **‘the protection of woodlands of high biodiversity value as an important consideration in the development management process’**, and ensure that this is taken into consideration in the West Lothian Tree and Woodland Strategy upon publication.
- Identify and map all ancient, veteran and notable trees by using the Native Woodland Survey Scotland (NWSS) to do this.

### Woodland Creation

Woodland creation and development features strongly in parts of the MIR, and the role woodland can play in recreation and climate change mitigation is acknowledged. However, the WTS would prefer to see a commitment to woodland creation throughout the entirety of the document, and recommends a greater focus on the benefits provided by native woodland.

Woodland Trust Scotland would like to see planning authorities encourage the inclusion of trees and woodland in open spaces in new developments. Authorities should consider carefully the scope for improved outdoor access routes, habitat corridors and woodland planting around new developments. Trees can play an important role in a development such as by helping reduce heating bills by keeping the wind away, and tackle noise pollution by absorbing and deflecting sound.

Woodland Trust Scotland would like to see a firm commitment to a significant increase in the areas of West Lothian’s native woodland in order to reap all the associated economic, social and environmental benefits it provides, which includes landscape, quality of life, pollution absorption, recreation, biodiversity and health. At the very minimum, West Lothian should adhere to the Scottish Planning Policy, and the Local Biodiversity Action Plan, but also include the protection and creation of woodland. The WTS recommends that these be taken into consideration in the West Lothian Tree and Woodland Strategy upon publication, and we would like to see the following included in the MIR, and ultimately the LDP:

- A firm commitment in significantly increasing the area of Scotland’s native woodland.
- Native woodland creation targeted in areas where it will deliver most in terms of benefits to people.
- An increase in the area of woodland that is accessible and welcoming to people. Such an increase would also allow wildlife to flourish which is essential in ensuring its ecological resilience in the face of climate change.
- A policy for the buffering and extension on ancient and semi-natural woodland sites through targeted woodland and habitat creation, which have greatest potential to be placed on a sustainable footing, and would be best for wildlife.
- We would also like to see a general reduction in the intensity of surrounding land use around woodland sites.

### Climate Change Adaptation

The West Lothian MIR sets out a strong framework for tackling climate change under the guidelines of the Climate Change (Scotland) Act 2009, with references to sustainable development, a greater focus on public transport and renewable energy developments. However, the role of trees in climate change adaptation is largely ignored, despite woodland protection and creation offering many benefits in this area.

Climate change has to be one of the most serious threats that native woodland faces and bold action is required to both reduce carbon emissions and help nature adapt. Woodland is well placed to act as a key component of a more sympathetic, resilient and receptive landscape for wildlife in the face of climate change.

This requires landscape scale action. In terms of woodland and wildlife this means:

- Conserving all semi-natural habitats, not just a representative sample of sites such as SSSIs.
- Restoring all woodland and semi-natural habitats planted with non-native conifers.
- Targeting habitat creation in areas where there is greatest potential to put woodland on sustainable footing, namely in the greatest existing conditions of ancient or semi-natural habitats
- Buffering native and semi-natural habitats from negative effects on intensive land use, extending their core area and reducing the intensity of land-use practices in-between semi-natural habitats in order to increase the ability of biodiversity to move across landscapes.
- Planting native woodlands in urban areas which can help settlements adapt to climate change as they help reduce the urban heat island effect, improve air quality and reduce building energy budgets.

#### Green and Habitat Networks

Protecting and creating new green and habitat networks feature strongly in the West Lothian MIR, with objectives already in place to protect existing networks, and a number of future publications, including the Local Landscape Development Review (LLDR) and Green networks background paper, have been designed to aid the council in placing development sites in the right place. The WTS understands the need for a strong renewable energy strategy, though these developments should be considered very carefully when placed near or by green or habitat networks. The WTS would also like to see increasing recognition of woodland as an especially valuable kind of green space in green infrastructure strategies and green network planning, and also as part of the wider landscape rather than individual strands of trees. Using the NWSS will allow councils to select appropriate sites for green networks, maximising opportunities for preventing further fragmentation, and for 'connecting up' smaller pockets of woodland. Any policies regarding green and habitat networks should refer to the National Planning Framework for Scotland 2, which states **"A well planned increase in woodland cover can substantially enhance the landscape settings of our towns and cities, bring vacant and derelict land back into beneficial use, improve biodiversity and amenity and help absorb CO2. Improvements can also be made to networks of other habitats, including wetlands, to counter fragmentation and assist species migration."**

#### Areas of development identified that will impact ancient woodland

Below are a list of potential developments set out in the West Lothian MIR that will result in direct loss to ancient woodland, or damage to ancient woodland by proximity. These sites are all either 'preferred new sites' or 'committed sites without planning permission'. The WTS strongly object to any of these developments going ahead, and recommend that alternative sites be found in order to align with the guidelines set out above. All sites were cross referenced with the Ancient Woodland Inventory and the NWSS. If further information is required, do not hesitate to contact us.

**Bridgend**

EOI-0065

EOI-0068

**Broxburn**

CDA WW

**Dechmont/Bangour**

HBn1/EOI-0034

**Livingston**

EOI-0110

**Bents**

EOI-0119

**Whitburn**

EOI-0119

**Winchburgh**

EOI-0193

If you would like any clarification on any of the points raised please contact the Trust on the above contact details.

Thank you for taking our comments into consideration.

Yours Sincerely,

Charlotte Wrigley  
Campaigning Team  
(Threat detector volunteer\*)

\*Threat detectors are a volunteer network which is managed by the Woodland Trust; please contact Katharine Rist if you wish to discuss the contents of this letter or volunteering