Woodland Trust Scotland
South Inch Business Centre
Shore Road
Perth
PH2 8BW
Telephone: 01738 635829
woodlandtrust.org.uk

Woodland Trust Scotland submission to Net Zero, Energy and Transport Committee on Scottish Biodiversity Strategy consultation

Woodland Trust Scotland (WTS) welcome the opportunity to give our views on the Scottish Biodiversity Strategy 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.

This submission will provide brief key points in relation to the following from the Woodland Trust's perspective:

- overall views on what is needed to address the biodiversity crisis;
- reflections on the outcomes specified in the consultation;
- legislative requirements to deliver the outcomes which might be needed; and
- views on what else needs to happen to deliver the outcomes set out in the consultation document.

Overall views on what is needed to address the biodiversity crisis

This Scottish Biodiversity Strategy must set out a clear direction for addressing the nature emergency. The Woodland Trust Scotland expects the Scottish Government to set out a bold strategy for biodiversity restoration with a **vision, clear targets and objectives** to reverse the ongoing decline in Scotland's nature.

Native woodlands are widely recognised as our most biodiverse habitats – for example Scotland's Forestry Strategy states that these woods will deliver most for biodiversity. Similarly, Scotland's ancient woodlands are recognised as irreplaceable by NatureScot. Scotland's woodland habitats include globally important areas of rainforest and Caledonian pine forest. Therefore, we believe that to reverse nature decline we must **reverse the trend of decline in our native woodland habitats** and the loss of healthy ancient and veteran trees. **Protecting, restoring and expanding** our existing native woodlands and trees gives us the opportunity to build back from these core sources of biodiversity.

Reflections on the outcomes specified in the consultation

The 2045 outcomes specified are too broad to do justice to a strategy that is supposed to tackle the nature emergency. For section 1 on Scotland's rural environment the 2045 outcomes do not adequately capture the changes that need to happen. These can be improved through adding more specific wording to the outcomes. We propose that in the final strategy the following is added related to Scotland's native woodlands:

- Scotland's native woodlands covers 10% of land area, with at least a quarter (>25%) of native woodland in 'good' ecological condition, with all the remaining considered to be in improving ecological condition.
- All ancient woodlands are in secure condition – meaning they are under active restoration to prevent further loss.

For section 3 on freshwater environment, the following 2045 outcome must be added in relation to riparian woodlands:

- A network of riparian woodland and healthy river systems present throughout Scotland, which delivers a range of benefits including flood protection, improved water quality and improvements for salmon fisheries, as well as helping to tackle the twin challenges of climate change and biodiversity loss.

For section 5 on towns and cities, where loss of ancient woodland is ongoing due to inappropriate development management and loss of trees close to where people live and work is ongoing, the final strategy outcomes must specify the following:

- No further loss of ancient woodland and veteran trees due to inappropriate development.
- Tree canopy cover increases equitably across Scotland's towns and cities.

The above are general points, which we will develop further in our consultation response to the Strategy.

Legislative requirements to deliver the outcomes which might be needed

Legislative requirements are useful to focus action, as we have seen with the statutory climate change emissions reduction targets. The Scottish Government is committed to an Environment Bill which is expected in 2023. It is expected that bill will set out statutory nature recovery targets – playing a similar function to the net zero targets – focussing funding, planning and action in government and across the wider society.

However, many of the outcomes can be delivered through a process of setting ambitious SMART targets. The Woodland Trust proposes the following targets and actions to deliver recovery in native woodland ecosystems – these are based on conservation evidence, and we believe are deliverable:

- Protect: the threats faced by our native woods must be addressed urgently. Ancient and veteran trees - our living legends - must be protected.
- Restore: 9% of all native woodlands to be in good condition by 2030, reaching 25% by 2045 and no ancient woodland to be in a critical condition by 2030.

- Expand: native woodland covers 7% of land area by 2030 and 10% by 2045.

We understand that the Scottish Government is also proposing to produce five-year delivery plans which will support the delivery of the strategy. Therefore the actions and targets we have set above are high level and designed for the key milestones of the strategy – 2030 and 2045 – and expect that the delivery plans would set out how these targets are reached. Robust delivery plans are not a substitute for clearer outcomes and high-level targets in the strategy itself.

Views on what else needs to happen to deliver the outcomes set out in the consultation document

To deliver recovery in native woodland habitats, the drivers of loss must be addressed. The main drivers of loss of native woodlands and trees are high deer numbers and their impacts, overgrazing by sheep in parts of Scotland, invasive non-native species such as rhododendron ponticum, and inappropriate development which chips away at trees and woodlands. Some of these drivers of loss are complex to address, such as sustainable deer management to ensure that deer are not impacting woodland and farming interests negatively. Similarly, another key driver of decline for native woodlands is the invasive plant rhododendron ponticum, an issue particularly for Scotland's rainforest along the west coast.

More broadly, funding for nature restoration has always been low in Scotland, compared to the scale of the challenge. The Green Finance Institute has estimated the investment gap for nature restoration in Scotland at around £20 billion over the next decade. While not all this can come from public funding, checks must be put in place to ensure that any non-public investment is responsible. It is also worth mentioning that in some cases, existing public funding could go further if it was better targeted: for example, funding should be phased out from deer fencing to more active deer management to reduce populations.

There is a clear need for public policies to be coherent. For example, the National Planning Framework and local planning policies need to be clear and unequivocal when it comes to development management that results in loss of ancient woodland. These policies should be watertight to guide development in areas that do not result in declines of irreplaceable habitats.

In summary, additional elements that would deliver better outcomes are clear targets and actions, addressing the drivers of loss of biodiversity, funding (more but also better targeted existing funding) and policy coherence.

Briefing
Key asks for the Scottish Biodiversity Strategy

Summary

What Woodland Trust Scotland wants to see in the Scottish Biodiversity Strategy:

- Targets for native woodland restoration
- Increased targets for native woodland expansion
- Whole ecosystem restoration of Scotland's rainforest
- A strategy and targets for R*hododendron ponticum* eradication
- Action on reducing deer overgrazing impacts
- Ancient and veteran trees recognised and protected for their biodiversity value

Introduction

This Scottish Biodiversity Strategy must set out a clear direction for addressing the nature emergency. The Woodland Trust Scotland expects the Scottish Government to set out a bold strategy for biodiversity restoration with a vision, clear targets and objectives to reverse the ongoing decline in Scotland's nature. Native woodlands are widely recognised as our most biodiverse habitats and include globally important areas of rainforest and Caledonian pine forest. Therefore, we believe that to reverse nature decline we must reverse the trend of decline in our native woodland habitats. Protecting, restoring and expanding our existing native woodlands gives us the opportunity to build back from these core sources of biodiversity. This briefing sets out the Woodland Trust Scotland's key actions to make the most of the benefits that our native woods can bring for Scotland's nature recovery.

Target for native woodland restoration, including the restoration of all Plantations on Ancient Woodland Sites

To reverse decline in our native woodlands, the Scottish Government must first set the right policies and funding mechanisms to protect and restore these. Woodland restoration and protection need to be given just as much focus as woodland expansion. Existing native woodland fragments are core sites for biodiversity and must be well managed. According to the Native Woodland Survey for Scotland overgrazing by deer and infestation with Rhododendron ponticum are the key threats to native woodland condition which supress the biodiversity value of these woodlands, affect their resilience and that of the species that depend on them. The recent National Forestry Inventory found that only 3% of Scotland's native woods are in favourable condition. Many native woods were also underplanted or replaced with conifers – a practice that no longer takes place – and these have resulted in Plantations on Ancient Woodland Sites or PAWS. Scotland has 70,500ha of PAWS sites which cover 0.9% of Scotland's land. These sites still retain ecological communities associated with ancient woodlands and should be gradually restored. The *Forestry Strategy for Scotland* recognises that suitably managed native woodlands, ancient woodland, and restored PAWS can contribute the most to

biodiversity. **To focus grants and action on native woodland restoration the Woodland Trust Scotland has developed the following targets for PAWS and native woodland restoration:**

- **By 2030 native woodland in 'good' ecological condition has trebled (from 3% to 9%), with most native woodland considered to be improving**
- **By 2045 at least a quarter (>25%) of native woodland will be in 'good' ecological condition, with all the remaining considered to be improving**
- **By 2030 no ancient woodland will be in critical condition**
- **By 2045 all ancient woodland will be in a secure condition.**

In addition to the targets set above, the Scottish Government must also deliver on its commitment to develop a Register of Ancient Woodlands and target funding to the protection and restoration of these habitats.

Increased targets for native woodland expansion – building back from existing native woodland sites

Native woodland is estimated to cover around 6% of Scotland's land, according to the National Forest Inventory. Many remaining native woodland sites exist in isolated fragments, but some are part of well-connected havens for biodiversity. For example, Scotland's rainforest is home to lichen and bryophyte species only found in Scotland, and ancient woodlands have been recognised by Nature Scot as irreplaceable for their biodiversity and cultural value. Since 2015 Scotland has had a target for native woodland expansion for 3,000 to 5,000ha per annum. In 2021 that target was replaced with a target for at least 4,000ha per annum and there has been a commitment to review this new target as part of the new Biodiversity Strategy. Despite some progress, native woodland cover remains low and actual annual creation has not significantly increased in recent years despite increases to the overall tree cover target for Scotland (see table in Annex 1 with the overall tree planting targets and actual native woodland delivered).

In a country as nature depleted as Scotland, expanding native woodland should be a priority. This is because these sites are core areas of biodiversity that we can build back from. **To help nature's recovery and maximise long-term carbon storage, Woodland Trust Scotland is calling for an increased native woodland expansion target as follows:**

- **By 2030, native woodland cover has reached 7% of land cover**
- **By 2045, native woodland cover has reached 10% of land cover**

Woodland expansion is a long-term goal, and so we want to see the Scottish Government take a long-term view and set an ambition that **native woodland cover will double in the next 60 years**, so from the current 6% to 12% of the land area. This expansion would be strategically targeted to areas where most ecological benefits would be delivered: riparian zones, montane woodland, expansion of Scotland's rainforest and connecting native woodland fragments.

We want the proposed targets above to be delivered according to the following conservation principles:

→ **Native woodland expansion should deliver habitat connectivity, building back from existing native woodland**. Decades of habitat network modelling demonstrates that new woodland which connects

and expands existing native and ancient woodland is likely to be most beneficial to biodiversity, allowing species to disperse through landscapes, colonise new habitat, and be able to better adapt to changes and pressures. Expanding native woodland networks from existing areas of woodland is the best way to expand native woodland for biodiversity recovery and helps deliver the Government's Nature Networks commitment.

- → Woodland expansion targets should go beyond the extent of woodlands, seeking to address the needs of indicator and target wildlife species and communities, ensuring that they have sufficient quality habitat and resources to thrive, whilst acknowledging there are likely to be long time-lags between woodland expansion and biodiversity response
- → **Any new native woodland expansion should create a diverse structure to support a variety of species.** We should seek to create a diverse structure of dense groves, open glades, and open-wooded habitats which blur the boundaries in all new native woodland creation projects. A varied woodland structure will provide more habitat niches and support a greater variety of species as new wooded ecosystems develop.
- → **Native woodland expansion should be part of a mosaic of habitats contributing to integrated land use and the restoration of functioning ecosystems.** New native woodland should not negatively impact existing priority habitats. Small patches of semi-natural habitats (many of which are also in poor condition) can be restored and integrated within native woodland creation designs, creating diverse habitat mosaics, and restoring naturally functioning ecosystems. In upland areas with larger areas of priority habitat, introducing tree and scrub components to create richer habitat mosaics may facilitate the restoration of the open priority habitat.
- → **Woodland needs to be given the opportunity to expand through natural colonisation.** Woodland expansion is not just about tree planting. We need to leave more space for natural colonisation, where seed is given the chance to spread outwards from existing woodlands. Trees establishing in this way are likely to be better adapted to the local context and more resilient in the face of climate change. The pattern of tree growth will also be more variable, with some dense clumps and some more widely spaced/scattered trees, contributing to structural complexity. Amongst other actions, this will require a concerted effort towards managing wild deer populations to sustainable levels.
- → **Restore natural processes** including decaying wood, natural hydrology, and large herbivores at sustainable densities to establish functioning native woodland ecosystems.

Whole ecosystem restoration on Scotland's rainforest through a dedicated Rainforest Restoration Fund

Scotland's rainforest has been recognised as a nature-based solution to the climate emergency and the Scottish Government has stated that the rainforest will be restored and expanded. We want to see the rainforest restored part of the delivery of the Scottish Biodiversity Strategy. As the best way to deliver this The Woodland Trust, Plantlife, RSPB, WWF are proposing a dedicated Scotland's Rainforest Restoration Fund to secure the future of the rainforest. The cost of restoration has been estimated at £500m. This fund is a

targeted, multi-year investment programme aimed at the whole ecosystem restoration of this globally important habitat. **The immediate aims for the restoration of the rainforest are to:**

- **Clear invasive *Rhododendron ponticum* from 134,000ha of the west coast including the 30,000ha of core rainforest sites, a further 24,000ha cleared in a buffer zone around existing woodland areas, and an additional 80,500 ha of other habitat cleared to ensure catchment scale eradication to prevents re-invasion. This can deliver biodiversity benefits and create local jobs as rhododendron control is labour intensive.**
- **Develop a sustainable grazing management regime over a 25,500ha area in this zone to allow the rainforest to regenerate naturally, which will enable it to sequester more carbon and ensure the long-term survival of its biodiversity.**
- **Expand and connect existing areas of core rainforest to double its area, providing greater resilience to other threats such as ash dieback, nitrogen pollution and climate change.**

A strategy and targets for Rhododendron ponticum eradication

Invasive non-native species, like Rhododendron ponticum, are key drivers of nature loss. *Rhododendron ponticum* is one of the key threats to Scotland's native woods and it is a particular problem on the west coast affecting Scotland's rainforest. Rhododendron chokes native woodlands and shades out plant species associated with the native woodland habitat. Rhododendron eradication must be done at catchment-scale otherwise there is the risk that the plant reinvades previously cleared areas. **The Scottish Government needs to:**

- **Set an overall aim to eradicate *Rhododendron ponticum* and set a target for this in the upcoming Biodiversity Strategy**
- **Commit to a strategy for eradicating *Rhododendron ponticum***
- **At the same time, the impact of other invasive non-native species on Scotland's nature should also be acknowledge in the strategy and the delivery plans must set out how these will be dealt with.**

Action on reducing deer overgrazing impacts to allow our native woods to thrive

Many of the actions set out above are being hampered by Scotland's increasing deer populations. These are now out of line with Scottish Government's ambition for peatland restoration and woodland expansion. The solution to solving Scotland's deer problem is provided by the implementation of the Deer Working Group (DWG) Report recommendations. We want to see this Scottish Biodiversity Strategy set out a clear direction for deer management in Scotland that will allow nature to thrive again. This Strategy and the delivery plans that will follow from this provide the opportunity to take forward the Deer Working Group recommendations that do not require legislation and give Nature Scot a renewed focus on urgently reducing deer impacts across Scotland. Action on reducing overgrazing impacts is clearly linked with the restoration and expansion targets set above and should focus on both upland and lowland areas. Furthermore, in the process of the DWG implementation, the Scottish Government should consider if a statutory deer management system is more appropriate than the current voluntary one.

Ancient and veteran trees are recognised and protected for their biodiversity value

Ancient and veteran trees are important for biodiversity; we consider that each tree is an ecosystem, providing a range of habitats for wildlife, plants and fungi that depend on conditions found in and around these trees. These trees also have a vital role as long-term carbon stores, especially in the soil around and beneath them. Scotland's ancient and veteran tree population is of national and international conservation significance – some of these trees are recorded onto an inventory of Trees of Special National Importance. Some of these trees are found within woodlands, and some in the wider landscape such as urban areas and farmland. Woodland Trust Scotland wants to see:

- These trees recognised and protected for their biodiversity value in the Biodiversity Strategy. The Strategy can highlight existing resources such as the Ancient Tree Inventory which also hosts the record of Scotland's Trees of Special National Importance. The Inventory needs to be added to, helping ensure that ancient and veteran trees are mapped, protected from impacts, and incorporated into woodland expansion proposals.
- Future farm payments which support enhanced protection and management of these trees, as many ancient and veteran trees exist on farmland and in hedgerows.

Contact details
Arina Russell, Policy and Advocacy Manager, Woodland Trust Scotland

Annex 1

Year	Tree planting target (hectares)	Native woodland creation target (hectares)	Native woodland creation delivered (hectares)**
2015-16*	10,000	3,000-5,000	1,093
2016-17	10,000	3,000-5,000	1,743
2017-18	10,000	3,000-5,000	3,978
2018-19	10,000	3,000-5,000	3,211
2019-20	10,000	3,000-5,000	3,857
2020-21	12,000	3,000-5,000	3,989
2021-22	13,500	4,000	4,360
2022-23	15,000	TBD	N/A
2023-24	16,500	TBD	N/A
2024-25	18,000	TBD	N/A

* Chosen because it is the year the 'Scottish Biodiversity Strategy: It's in Your Hands' was launched setting a target for native woodland creation for 3,000-5,000ha/annum. In 2015-16 the current Forestry Grant Schemes were also launched.

** Based on approved grants for the following options within the Forestry Grant Scheme: native broadleaves, native Scots pine, native upland birch, native broadleaves in northern & western isles, and native low density.