

# Respondent Information Form

Forestry Commission Scotland: Review of the Scottish Forestry Strategy

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name: Mike Wood, on behalf of the Scottish Environment LINK Woodland Task Force

**Scottish Environment LINK is an umbrella body for environmental NGOs. In this case we are representing the views of:**

- Butterfly Conservation
- Council for Scottish Archaeology
- National Trust for Scotland
- Ramblers' Association Scotland
- Reforesting Scotland
- RSPB (Royal Society for the Protection of Birds)
- Scottish Native Woods
- Scottish Wild Land Group
- Woodland Trust Scotland
- WWF Scotland

Address: Scottish Environment LINK, 2 Grosvenor House, Shore Road, Perth PH2 8BD

Daytime telephone: 01738 630804

E-mail: [enquiries@scotlink.org](mailto:enquiries@scotlink.org)

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## 1. Are you responding: (please tick one box)

- (a)  as an individual? go to Q2a/b and then Q4
- (b)  on behalf of a group/organisation? go to Q3 and then Q4

## Individuals

**2a. Do you agree to your response being made available to the public (in the Scottish Executive library and on the Forestry Commission Scotland website)?**

- YES (go to 2b below)
- NO, not at all *We will treat your response as confidential*

**2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)**

- YES, make my response, name and address all available
- YES, make my response available, but not my name or address
- YES, make my response and name available, but not my address

Annex 2: Responding to this Consultation Paper

## On Behalf of Groups or Organisations

3. The name and address of your organisation will be made available to the public (in the Scottish Executive library and on the Forestry Commission Scotland website).

Are you also content for your response to be made available?

- YES
- NO *We will treat your response as confidential*

## Sharing Responses/Future Engagement

**4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They might wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?**

- YES
- NO



*Review of the Scottish Forestry Strategy – First Consultation*<sup>1</sup>  
Consultation response by Scottish Environment LINK  
September 2005

**Introduction**

Scottish Environment LINK welcomes this opportunity to contribute to this consultation.

**Response to Consultation Questions**

**Question 1**

***What do you think have been the best things to have happened in forestry since 2000?***

There have been some significant advances since 2000, including:

for forestry for people:

- Increase in community involvement in decision-making in woodland use and management
- Launch of the National Forestry Land Scheme
- Support to other initiatives that promote forest use in people's lives e.g. Woods for All, 7 Stanes project, and Forest Schools
- Establishment and outputs of the Forestry for People Panel
- Creation of Regional Forestry Forums
- Launch of Woodlands In and Around Towns challenge fund

for biodiversity:

- Increased action on capercaillie, including deer fence marking<sup>2</sup> – more action is required to secure and enhance suitable habitat, particularly native pinewood plantations.
- The June 2003 introduction of the Scottish Forestry Grants Scheme (SFGS) has brought forward positive nature conservation measures, but we would like to see increased range of available biodiversity specifications, including for black grouse and to facilitate open-ground habitat restoration beyond 20% of forest area, as well as increased uptake.

However, there has been an increasing recognition that targets to increase woodland cover to 25% of Scotland are inappropriate. Scotland remains one of the least forested countries in Europe, and whilst we do not want to see planting on inappropriate sites (such as peatlands or important semi natural habitats), we would like to see native woodland expansion targeted in areas where there are the greatest concentrations of ancient or semi-natural woodlands. Public funds should be used to enhance Scotland's historic landscapes and biodiversity.

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<sup>1</sup> See: <http://www.forestry.gov.uk/forestry/INFD-6C3D4G>; consultation deadline: 16th September 2005 to: [sharon.robinson@forestry.gsi.gov.uk](mailto:sharon.robinson@forestry.gsi.gov.uk); Sharon Robinson, Forestry Commission Scotland, Silvan House, 231 Corstorphine House, Edinburgh, EH12 7AT. Current strategy: Scottish Executive & Forestry Commission. (2000) *Forests for Scotland – the Scottish Forestry Strategy*. Forestry Commission, Edinburgh. <http://www.forestry.gov.uk/forestry/cmar-5j8l7s>

<sup>2</sup> See: Forestry Commission (2001) *Deer & Fences. Forestry Commission Guidance Note 11*, revised edition, March 2001. FC Scotland, Edinburgh. [http://www.forestry.gov.uk/website/pdf.nsf/pdf/guidancenote11.pdf/\\$FILE/guidancenote11.pdf](http://www.forestry.gov.uk/website/pdf.nsf/pdf/guidancenote11.pdf/$FILE/guidancenote11.pdf)

## **Question 2**

### ***Has the Forestry Strategy failed to deliver anything important?***

**Yes**, the 2000 Scottish Forestry Strategy has a very broad range of Strategic Directions, but these need to be more clearly focused on outcomes for public benefit, rather than the current economic focus. See also response to Question 4.

## **Question 3**

### ***Is the broad content of the current Forestry Strategy still relevant and appropriate?***

**No**, see response to Question 4.

## **Question 4**

### ***Are any changes now required to the Forestry Strategy's Vision, Guiding Principles and Strategic Directions? If so what are they?***

We were disappointed that the overwhelming emphasis of the current strategy is on economic issues. The strategy fails to give sufficient emphasis to environmental and social considerations. A key theme of the strategy has to be 'public money for securing public benefits' on both private and public woodland.

We believe the vision in the strategy fails to give sufficient direction - for instance, in relation to the preferred scale, nature and locations of forests, the balance of forestry with other land uses, and the need to increase the environmental and social outputs of forestry. The vision also does not recognize the opportunities present in Scotland to secure large-scale ecological restoration of native forests from montane scrub in the hills, to wet woods on floodplains and at the loch shore, to the restoration of ancient woodland sites currently plantations (PAWS).

As a matter of principle we do not agree that priorities should focus only on new action. It is important that all existing activity on the social and environmental aspects of sustainable forestry are also carried forward as commitments to take action in part 3 of the Strategy.

We also do not agree with much of the analysis in parts 1 and 2 of the strategy which has informed the priorities. For instance, we would highlight a lack of economic, social or environmental analysis behind proposals to increase the rate of planting of high-yielding conifers under FFR1, which we believe will deliver little in terms of public benefit.

We believe the priorities section of the strategy should give a much clearer indication of what is to be done, with a robust justification for each action. We would also favour the use of clear and quantified targets, rather than the current suite of 'Indicators of Progress', which are imprecise and incomplete.

The strategy needs to safeguard open ground biodiversity through a clear commitment in the priorities, for example producing framework guidance for the development of local and regional level woodland/forestry strategies – such as IFS, LFF, regional woodland strategies that don't conform to 1999 guidance<sup>3</sup> and FCS Strategic Plans – that protect and enhance biodiversity.

The revised Scottish forestry strategy needs to make a commitment to develop national guidance on local and regional forestry/woodland strategy formulation and implementation. FCS and the Scottish Executive are currently not providing a sufficient strategic steer to the development of local and regional level forestry/woodland strategies. The Scottish Forestry Strategy, and its regional expressions, needs to conform to the UK's 2003 MCPFE forest programme commitments<sup>4</sup>.

The strategy needs a much stronger steer on reasonable balance issues at the Scotland-wide level. It is essential that the strategy provides strategic guidance on those areas where afforestation would be most and least appropriate, i.e. to highlight those areas which should rather than could be planted. As an absolute minimum, a clear statement on the future prospects for commercial afforestation in areas where reasonable balance issues are most acutely felt. This cannot solely rely on bottom-up strategy formulation by local and regional woodland initiatives.

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<sup>3</sup> Scottish Executive Development Department (1999) *Circular 9/1999 Indicative Forestry Strategies*. SEDD, Edinburgh. <http://www.scotland.gov.uk/Topics/Planning-Building/Planning/15243/2174>

<sup>4</sup> Ministerial Conference for the Protection of Forests in Europe (MCPFE) Vienna 2003 Resolution 1: [http://www.mcpfe.org/mcpfe/resolutions/vienna/Vienna\\_Resolution\\_1.pdf](http://www.mcpfe.org/mcpfe/resolutions/vienna/Vienna_Resolution_1.pdf)

## **Question 5**

### ***Should any of the existing Priorities for Action be dropped? If so, which ones?***

Given that Challenge Funds may not be permissible under the 2007-13 Rural Development Regulation it may be necessary to remove FFR 2. The Garrod Report<sup>5</sup> concluded that there was questionable value in the use of Challenge funds on economic grounds. The social and landscape benefits relative to the public costs were also limited.

We query whether the state forest annual new planting targets – such as 5,000 hectares under PCE 2 and 42,000 hectares under PCE 3 - are appropriate, particularly given the objective of linking more closely with agricultural policy and Land Management Contracts. The current strategy has a presumption in favour of woodland expansion, this should build on good work already being carried out such as Woods In and Around Towns and for the emphasis to focus on sustainable environmental benefits, placing environmental and social values at its heart. Any increase of forest cover should take into account environmental impact and how afforestation can deliver multiple benefits including those to health, education, social inclusion and biodiversity.

Equally while there are some habitats that benefit from increased woodland cover there are others that benefit from the maintenance of open ground or clearance of woodland cover to create open ground. This is particularly true for many cultural heritage sites and areas.

Given that farming is moving away from production subsidies it may be legitimate to ask why forestry planting is being subsidised at all unless it is for clear public benefits such as amenity, landscape or biodiversity significance.

## **Question 6**

### ***Should there be any new Priorities for Action? If so what should they be?***

There are significant gaps in the current 'Priorities for Action', see response to Question 2.

We consider the following priorities for action need to be in the new strategy:

#### **Public Money for Public Benefits**

- Create, diversify and enhance access to woodlands across Scotland giving greater recognition to the associated health and quality of life benefits and their non-market contribution to the economy
- Either a 'green thread' to run throughout the new strategy, cross-cutting all actions or each action to be assessed on the basis of the 3 pillars of sustainability

#### **Ancient and Semi Natural Woodland and PAWS**

- A new commitment to enhance protection for ancient woodland contained in the strategy, to be fulfilled through the new role of FCS as statutory consultee on planning applications with over 0.25ha of felling.
- Draw up an action plan to identify and restore PAWS sites on the FE estate and alert private landowners to grants and opportunities for restoration.

#### **Delivering Current Biodiversity Commitments**

- Draw up an action plan to identify and restore sites of high biodiversity value, in particular UK BAP priority Habitat Action Plans for open-ground – such as peatland currently forested - native woodland, and EU priority habitats, species and designated sites.
- Restoring parts of the existing plantation forestry resource to semi-natural open ground and native woodland habitats.

#### **Woods for People**

- Explore opportunities for joint projects within woodlands aimed at improving social inclusion, community cohesion, education and health. There should be increased emphasis on working with communities, rather than doing things for communities.
- Promotion of forest schools to teach children about the natural environment, introduce them to woodland culture and the sustainable use of forest products.
- Localise sustainably-managed forest-based industry processes and transport
- Work with NHS Scotland and the Scottish Executive Health Department to increase the contribution of woodland to reducing recovery times through woodland creation around hospitals and recognise the role woodlands can play in alleviating respiratory diseases

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<sup>5</sup> Garrod (2004) *Economic Evaluation of the Central Scotland Forest and Grampian Challenge Funds*.

through improving air quality in urban areas and reducing heart disease, stress and obesity through woodland recreation.

- Promote the wider use of participatory tools in both state forest management and policy development.

#### Climate Change

- Conserve all semi-natural habitats and restore all woodland and semi-natural habitats planted with non-native conifers.
- Woodland creation to be primarily of native species and targeted in areas where there are greatest concentrations of ancient or semi-natural habitats.
- Work with local authorities and the Scottish Procurement Directorate to ensure all new public buildings such as schools, hospitals, swimming pools, council and government offices examine whether a wood fired heating systems could either be “retro” fitted or included as a priority in tenders for new builds.
- Work with the Scottish Executive Energy Division to promote woodfuel to those suffering from fuel poverty.
- Promote the setting up of local supply chains for those with a local forest resource and encourage community buy-in.
- All woodland planted is to be appropriately sited, managed properly and to provide multiple benefits, and certified under the UK Woodland Assurance Standard (UKWAS).
- Conditions on grants for woodland operations to encourage appropriate carbon storage of existing woodland through minimal disturbance and sustainable timber transport.

#### Access Provision

- Work with local authority access officers to implement their duty under the Land Reform (Scotland) Act 2003 to draw up core path networks and assist communities in developing path networks and access more generally.
- Ensure, through forest design, that there is permeable access through the woodland to the wider countryside.

#### Woodland Heritage

- Encourage identification and management of archaeological areas through incentives and as part of the design planning process.
- Working with VisitScotland, promote woodland heritage, such as significant veteran trees, as a link to Scotland’s past.
- A new Priority for Action should be added under ‘Positive Contribution to the Environment’ to *Improve management of cultural heritage in woodland*.

#### Integration of Land Use

- Integrate SFGS into Tier 3 of the Land Management Contracts.
- SEERAD and FCS to work together to promote a seamless service to landowners.

#### Forestry Practice

- A commitment to withdrawal of inappropriately sited commercial forestry which will result in ecological and amenity gains.
- Work with the Deer Commission Scotland to reinvigorate the Deer Management Planning process and the use of deer fencing as the exception rather than the rule.

#### Question 7

***Is an appropriate balance being achieved between the economic, environmental and social aspects of forestry? If not, please give specific examples.***

The strategy needs a much stronger steer on reasonable balance issues at the Scotland-wide level. It is essential that the strategy provides strategic guidance on those areas where afforestation would be most and least appropriate, i.e. to highlight those areas which should rather than could be planted.

As an absolute minimum, a clear statement on the future prospects for commercial afforestation in areas where reasonable balance issues are most acutely felt. This cannot solely rely on bottom-up strategy formulation by local and regional woodland initiatives.

#### Question 8

***Do you agree that the Scottish Forestry Strategy should be focused primarily on increasing the benefits of forestry to the people of Scotland?***

**Yes**, public money must be used for securing public benefits on both private and public land.

Public opinion has consistently indicated that the top priorities for these funds are for public benefits such as to provide places for wildlife, opportunities to walk/healthy places for physical activity and to help prevent the greenhouse effect and global warming.

Therefore, we would like to see the strategy build on good work already being carried out such as Woods In and Around Towns and for the emphasis to focus on sustainable environmental benefits, placing environmental and social values at its heart. Any increase of forest cover should take into account environmental impact and how afforestation can deliver multiple benefits including those to health, education, social inclusion and biodiversity.

#### Priorities for Action:

- Restructure diversity of, create new and enhance access to woodlands across Scotland giving greater recognition to the associated health and quality of life benefits and their non-market contribution to the economy.
- Either a 'green thread' to run throughout the new strategy, cross-cutting all actions or each action to be assessed on the basis of the 3 pillars of sustainability.

#### **Question 9**

##### ***Should woodlands play a greater role in helping Scotland deal with climate change? If so, how?***

Woods and forests will be affected by the changing climate and it is important to start planning and structuring grants around protection forestry and landscape scale action in order for the widest amount of biodiversity to be able to survive. Forested landscapes, at a catchment level, will have an increasing role in adapting landuse to climate change through sustainable flood management.

There is also a major opportunity for the use of existing forest resources as sources of woodfuel for heating buildings, especially houses off the mains gas network and public buildings. It is important that any new woods established for this purpose are managed sustainably and that use is close to the source. There are opportunities for reducing carbon emissions through promoting small-scale and domestic use of wood fuel, either for heat or electricity generation, from sustainably managed Forest Stewardship Council (FSC) certified sources. We are concerned however, at the implications of industrial scale energy generation from wood/short rotation coppice, both in terms of the large area of land required to provide biomass as well as the pressure for intensive forest management.

In designing new policies to support either the reduction of carbon emissions or the adaptation of forest management to new climate conditions, steps will need to be taken to avoid harming biodiversity.

We do not support carbon sequestration as a primary driver for planting and management of Scottish woodlands - carbon sequestration is an ineffective solution to human-induced climate change<sup>6</sup>. There may be biodiversity and other opportunities provided by the creation and management of forestry for 'carbon sequestration' objectives, but such forestry must be appropriately located, deliver for multiple benefits and conform to best practice sustainable forestry.

We would be concerned if the Scottish Executive's new forestry strategy, or other policies that influence its development or implementation, encourages 'carbon offset' forestry as a singular or primary forest management objective. We have reservations about the commercialisation of forest sequestration due to the questionable scientific basis and the messages given out on the achievements of carbon 'offset' rather than emissions reduction. While our woods and forests fulfil this process it could only offset a tiny proportion of our emissions.

Currently Forestry Commission Scotland doesn't fund 'carbon sequestration' planting and management, although plantations can be established for other stated objectives with the forest owners/managers independently considering the sequestration 'benefits' The new Scottish forestry strategy must ensure such woodlands are subject to appropriate regulation and meet biodiversity objectives.

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<sup>6</sup> For background reasons why, see: FERN (2005) *Carbon Offset – no 'magic' solution to 'neutralise' fossil fuel emission*. FERN Briefing Note, FERN Brussels. <http://www.fern.org/pubs/briefs/carbon%20offset.pdf>; see also: <http://www.fern.org/pubs/reports/treetr.pdf> & <http://www.sinkswatch.org>

Account must also be made of the role of forests in emitting carbon through change in land use, harvesting and transport. As the current forestry strategy states, *'forests will not be planted with the sole aim of storing carbon – they must bring other benefits as well'*. The focus must be on reducing emissions in all forest-related activities whilst creating woodland in the right locations which will produce multiple benefits.

We would support measures to encourage greater use of timber from local sustainably managed, accredited sources – FSC compliant UKWAS - in construction as an alternative to more carbon intensive materials. This could also have benefits for native woodlands as highlighted in the UK BAP process, which includes actions to encourage markets for timber from native woodlands.

#### Priorities for Action:

- Promote and support the role of well managed woodlands in catchment level sustainable flood management
- Conserve all semi-natural habitats and restore all woodland and semi-natural habitats planted with non-native conifers.
- Woodland creation to be primarily of native species and targeted in areas where there are greatest concentrations of ancient or semi-natural habitats.
- Work with local authorities and the Scottish Procurement Directorate to ensure all new public buildings such as schools, hospitals, swimming pools, council and government offices examine whether a wood fired heating systems could either be “retro” fitted or included as a priority in tenders for new builds.
- Work with the Scottish Executive Energy Division to promote woodfuel to those suffering from fuel poverty.
- Promote the setting up of local supply chains for those with a local forest resource and encourage community buy-in.
- All woodland planted is to be appropriately sited, managed properly and to provide multiple benefits, and certified under the the UK Woodland Assurance Standard (UKWAS).
- Conditions on grants for woodland operations to encourage appropriate carbon storage of existing woodland through minimal disturbance and sustainable timber transport.

#### Question 10

##### ***What should be the role of forestry in sustainable rural development?***

To enhance the delivery of public benefits. Forestry has a significant part to play in sustainable rural development and the more strongly involved it is with wider rural land use planning the more coherent will be both Executive and FCS policy.

This is particularly true in the distinction between woodland and agriculture and we believe that FCS and SEERAD should be producing much more integrated models for the new LMCs (Land Management Contracts). The development of Farm Woodland Plans as part of the new Tier 2 LMCs is to be welcomed but more work needs to be done, especially in the integration of woodland grazing. The maintenance of open woodland as wood pasture, parkland or as amenity woodland around towns needs a different approach than that of commercial stocking rates (eg minimum stocking densities of 1,100 trees per hectare).

#### Question 11

##### ***How could forestry become more of an exemplar of sustainable development in Scotland?***

By enhancing the delivery of public benefits. Forestry could become more of an *'exemplar of sustainable development'* by integrating more closely biodiversity, cultural heritage, and landscape issues in its planning policy. This is both within sub-national strategies – such as IFS , IFF and non-IFS based woodland strategies - and more specifically with FCS regional Strategic Plans, and public and private sector Forest Design and Farm Woodland Plans.

#### Question 12

##### ***How should Scotland respond to the opportunities presented by the increasing supply of timber from Scotland's woodlands?***

Promoting the use of existing wood resources as a source of woodfuel. Ensuring woodlands are managed in an environmentally sustainable way, delivering public benefits. Certification of woodland management to the UK Woodland Assurance Standard (UKWAS) needs to be a key component of this.

### **Question 13**

#### ***How could the overall economic potential of Scotland's woodlands be increased?***

We consider that the forest industry, and in particular the FCS could do more to promote the tourism and environmental education value of heritage and biodiversity in existing woodlands. This needs to be managed to enhance, and not disturb or damage biodiversity or cultural heritage.

### **Question 14**

#### ***Should the private and public forestry sectors engage further in social issues such as deprivation, health, equality, and disability? If so, how? Where is this a high priority in Scotland?***

Access to woodland has been shown to have many benefits at an individual level and these are enhanced when communities come together and take an active interest in their local woodland. There is scope for fostering greater inclusion of communities through involvement in decisions on forest design and access as well as through promotion of community woodland enterprise such as local processing, installation of recreation facilities and associated forest employment.

Woodlands around towns have usually been extensively managed by people by the centuries and this should be reflected in woodland design, management and interpretation. This approach is more likely to lead local people to identify with their local woods and thus to use them for health and other social benefits.

#### **Priorities for Action:**

- Explore opportunities for joint projects within woodlands aimed at improving social inclusion, community cohesion, education and health. There should be increased emphasis on working with communities, rather than doing things for communities. Explore the role of the Regional Forest Forums in supporting this work.
- Promotion of forest schools to teach children about the natural environment, introduce them to woodland culture and the sustainable use of forest products.
- Localise sustainably-managed forest-based industry processes and transport.
- Work with NHS Scotland and the Scottish Executive Health Department to increase the contribution of woodland to reducing recovery times through woodland creation around hospitals and recognise the role woodlands can play in alleviating respiratory diseases through improving air quality in urban areas and reducing heart disease, stress and obesity through woodland recreation.

### **Question 15**

#### ***Has there been sufficient focus on the contribution of woodlands to the enhancement of our natural heritage? If not, what more needs to be done?***

**No**, the strategy needs to deliver existing Scottish, UK, EU and International biodiversity commitments.

There are a number of biodiversity commitments which the Scottish Executive is signed up to, but have yet to fully deliver in Scotland's woods and forests. Key are the UK Biodiversity Action Plan (UK BAP) and EU Habitats and Birds Directives commitments, the Scottish Biodiversity Strategy and 2001 Gothenburg commitment to halt biodiversity decline by 2010. The revised strategy will need to incorporate these commitments to biodiversity action as a key cross-cutting principle, and follow this through with delivery. This should apply throughout public and private sector forestry in Scotland, not just in existing native woodlands, and include habitats and species, both within woodland and associated with forest management.

#### **Priorities for Action:**

- Draw up an action plan to identify and restore sites of high biodiversity value, in particular UK BAP priority Habitat Action Plans for open-ground – such as peatland currently forested - native woodland, and EU priority habitats, species and designated sites.
- Restoring parts of the existing plantation forestry resource to semi-natural open ground and native woodland habitats.

### **Question 16**

#### ***Has there been sufficient focus on the contribution of woodlands to the enhancement of our cultural heritage? If not, what more needs to be done?***



No, there has been 'insufficient focus on the contributions of woodlands to the enhancement of our cultural heritage'. The forestry strategy should include a new Priority for Action to *Improve management of cultural heritage in woodland*. The forestry strategy must deliver the Executive's historic environment strategy<sup>7</sup>.

This requires a strategic look at the role of cultural heritage sites in woodland in Scotland, the structure of curatorial support for FCS and forest managers, the importance of cultural heritage sites to local communities and the resources required to deal appropriately with surviving cultural heritage sites. Current curatorial arrangements are not working properly in a number of areas and a better system of support needs to be designed. This may require increased funding from the Scottish Executive.

The new strategy should place more emphasis on the stewardship of existing woodland heritage, not only archaeological sites but also veteran trees, wood pasture and coppiced areas. This could be publicised to visitors as part of a wider promotion of opportunities available in Scotland's woods and forests. There is the potential to significantly increase the archaeological area under positive management through UK Woodland Assurance Standard (UKWAS) certification.

#### Priorities for Action

- Encourage identification and management of archaeological areas through incentives and as part of the design planning process.
- Working with VisitScotland, promote woodland heritage, such as significant veteran trees, as a link to Scotland's past.
- A new Priority for Action should be added under 'Positive Contribution to the Environment' to *Improve management of cultural heritage in woodland*.

#### **Question 17**

##### ***How can the forestry sector be better integrated with other land uses?***

See also response to Question 11.

With CAP reform, there is a real opportunity for the Scottish Executive to take a more holistic approach to land use integrating agriculture with forestry and water management. This will fulfil a number of environmental benefits as well as encourage a more collaborative approach to landscape scale action, which is particularly important in light of the onset of climate change.

The Land Management Contract Forestry Technical Group has proposed that LMCs are extended to include all forest land by 2007. This is to be welcomed. However, care must be taken to ensure that SFGS is completely integrated into LMCs so that farmers and landowners need only fill in a single form for grants. The service to farmers and landowners must be seamless to be effective.

Forestry Commission Scotland will soon be designated as 'responsible' authority under the Water Environment and Water Services (Scotland) Act 2003, which means that it will have responsibilities towards delivering Water Framework Directive. FCS, through its action, will have to promote sustainable flood management, but also contribute to achieving WFD objectives, for example where appropriate restore wetlands/woodlands to achieve good ecological status. Such woodland planting must not to the detriment of priority habitats, and be appropriately located, managed according to UKWAS, and contribute to the UKBAP Wet Woodland HAP targets.

More work is needed to investigate the positive benefits to biodiversity from managed grazing in woodlands.

#### Priorities for Action

- Integrate SFGS into Tier 3 of the Land Management Contracts.
- SEERAD and FCS to work together to promote a seamless service to landowners.
- Promote the role of well-managed woodlands in sustainable flood management.

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<sup>7</sup> Historic Scotland (2002) *Passed to the Future – Historic Scotland's policy for sustainable management of the historic environment*. Historic Scotland, Edinburgh. <http://www.historic-scotland.gov.uk/pasttofuture.pdf>

### **Question 18**

***How should we determine the appropriate extent and distribution of woodland in Scotland? How much woodland do we need? What type of woodland do we need and where do we need it?***

Woodland needs to be appropriately located and designed to enhance biodiversity and cultural heritage, not damage it.

Any aspirational target for woodland expansion needs to be clear and justified. Any woodland expansion target must be connected to a clear commitment to delivering multi-benefit sustainable forestry, including meeting biodiversity, access and cultural heritage targets. Afforestation, restocking and forest management driven by the Scottish forestry strategy must have favourable, not adverse effects on biodiversity, access or cultural heritage value of Scotland's woodland and associated land.

### **Question 19**

***Should regional priorities be reflected in the revised Strategy? If so, how?***

Reflected, not dominate or over-write existing national commitments, for example the UK Biodiversity Action Plan.

The Scottish Forestry Strategy, and its regional expressions, need to conform to the UK's 2003 MCPFE forest programme commitments<sup>8</sup>.

The revised Scottish forestry strategy needs to make a commitment to develop national guidance on local and regional forestry/woodland strategy formulation and implementation.

FCS and the Scottish Executive are currently not providing a sufficient strategic steer to the development of local and regional level forestry/woodland strategies. We are concerned about the varying quality of the local and regional forestry/woodland strategies that the Scottish Forestry Grants Scheme Locational Premiums fund. FCS and the Scottish Executive Development Department must work up replacement Indicative Forestry Strategy guidance<sup>9</sup> for all local/regional woodland and forestry strategies as a matter of priority.

### **Question 20**

***Is the balance of support mechanisms for forestry about right? If not, how should it change?***

**No**, the changes in funding and direction for agriculture will inevitably lead to a necessary re-examination of the funding for forestry. This has been partially reflected in the development of the Scottish Forestry Grants Scheme (SFGS) Stewardship Grants, but will need much more work before fully integrated Land Management Contracts (LMCs) and River Basin Management Plans (RBMPs) can be adopted.

The shift on agricultural land management from historic production subsidies towards a more stewardship approach to is still being developed. If current trends are continued this will result in area based payments focusing public subsidy much more strongly on the stewardship of the land for public benefit.

FCS have already worked with SEERAD to identify ways to better manage farm woodlands and an estimated 185 farmers applied this year under the Tier 2 Menu Scheme to produce Woodland Plans on their farms. To get all farm woodlands properly integrated into LMCs and thus appropriately managed will clearly take considerable effort and may require a significant refocusing of the FCS to achieve this.

For open ground habitat restoration under SFGS, UK Biodiversity Action Plan priority habitats need to be funded for clearance beyond the current maximum limit of 20% forest area. Forestry Commission Scotland will grant permission for such felling up to 100% of forest area through Environmental Impact Assessment and Felling Licences (latter changes under the 2004 Nature Conservation [Scotland] Act) but will not grant aid this beyond the 20% forest area limit. This needs to be changed to facilitate meeting Scottish, UK, EU and International biodiversity commitments.

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<sup>8</sup> Ministerial Conference for the Protection of Forests in Europe (MCPFE) Vienna 2003 Resolution 1: [http://www.mcpfe.org/mcpfe/resolutions/vienna/Vienna\\_Resolution\\_1.pdf](http://www.mcpfe.org/mcpfe/resolutions/vienna/Vienna_Resolution_1.pdf)

<sup>9</sup> replacing: Scottish Executive Development Department (1999) *Circular 9/1999 Indicative Forestry Strategies*. SEDD, Edinburgh. <http://www.scotland.gov.uk/Topics/Planning-Building/Planning/15243/2174>

The introduction of the SFGS has brought forward positive nature conservation measures, but we would like to see increased range of available biodiversity specifications, including for black grouse and to facilitate open-ground habitat restoration, as well as increased uptake.

Stewardship Grants must be more clearly focused on heritage outcomes as a central part of Forest Design. This would be consistent with UKWAS certification becoming a condition of any forestry grant, and FCS should work towards a timetable to only supplying grants for woods attempting to follow UKWAS standards.

Changes to SFGS as a result of the 2007-13 Rural Development Regulation<sup>10</sup> offer an opportunity for better sustainable forestry in Scotland, in particular the integrated delivery of environmental and social benefits. We wish that the new Scottish forestry strategy sets clear priorities for this, both within the forestry strategy but also in the linked development of the Scottish Rural Development Plan. The new forestry strategy must make the commitment to a range of delivery mechanisms, for example grants (SFGS plus non-FC regulated support), advice, monitoring and research. The forestry strategy needs to restate its commitment to sustainable forest management policy & practice<sup>11</sup>.

The new strategy needs to make a commitment to apply the existing government cross-compliance mechanism – Forestry Commission *UK Forestry Standard*<sup>12</sup> - to non-Forestry Commission regulated woodland sectors – agriculture, planning & energy (e.g. black grouse work in forest windfarm developments). Forestry Commission Scotland needs to become a statutory consultee in the planning process.

#### Priorities for Action

- Integrate SFGS into Tier 3 of the Land Management Contracts
- SEERAD and FCS to work together to promote a seamless service to landowners
- Apply UK Forestry Standard to non-FCS regulated forestry and woodland work

#### Question 21

##### ***Could forestry incentives be better focused on key priorities? If so, how?***

**Yes**, changes to the Scottish Forestry Grants Scheme (SFGS) as a result of the 2007-13 Rural Development Regulation<sup>13</sup> offer an opportunity for better sustainable forestry in Scotland, in particular the integrated delivery of environmental and social benefits. This is needed to facilitate the delivery of the Priorities for Action we identify in response to Question 6.

We wish that the new Scottish forestry strategy sets clear priorities for this, both within the forestry strategy but also in the linked development of the Scottish Rural Development Plan. The new forestry strategy must make the commitment to a range of delivery mechanisms, for example grants (SFGS plus non-FC regulated support), advice, monitoring and research. The forestry strategy needs to restate its commitment to sustainable forest management policy & practice<sup>14</sup>.

The new strategy needs to make a commitment to apply the existing government cross-compliance mechanism – Forestry Commission *UK Forestry Standard*<sup>15</sup> - to non-Forestry Commission regulated woodland sectors – agriculture, planning & energy. Forestry Commission Scotland needs to become a statutory consultee in the planning process.

#### Question 22

##### ***Do you have any additional comments that would help us with the review of the Scottish Forestry Strategy?***

<sup>10</sup> [http://ue.eu.int/ueDocs/cms\\_Data/docs/pressData/en/agricult/85525.pdf](http://ue.eu.int/ueDocs/cms_Data/docs/pressData/en/agricult/85525.pdf)

<sup>11</sup> Continuing multi-benefit sustainable forestry principles established in: Forestry Commission (1991) *Forestry Policy for Great Britain*. Sept. 1991. FC, Edinburgh; & UK commitment to 1993 MCPFE Helsinki Principles for sustainable forest management in Europe, see: <http://www.mcpfe.org/resolutions/helsinki>; and UK Forestry Standard.

<sup>12</sup> Forestry Commission & DARDNI (2004) *UK Forestry Standard – the Government's Approach to Sustainable Forestry*. 2<sup>nd</sup> Edition. Forestry Commission & Forest Service, Department of Agriculture & Rural Development Northern Ireland. [http://www.forestry.gov.uk/website/PDF.nsf/pdf/fcfc001.pdf/\\$FILE/fcfc001.pdf](http://www.forestry.gov.uk/website/PDF.nsf/pdf/fcfc001.pdf/$FILE/fcfc001.pdf)

<sup>13</sup> [http://ue.eu.int/ueDocs/cms\\_Data/docs/pressData/en/agricult/85525.pdf](http://ue.eu.int/ueDocs/cms_Data/docs/pressData/en/agricult/85525.pdf)

<sup>14</sup> Continuing multi-benefit sustainable forestry principles established in: Forestry Commission (1991) *Forestry Policy for Great Britain*. Sept. 1991. FC, Edinburgh; & UK commitment to 1993 MCPFE Helsinki Principles for sustainable forest management in Europe, see: <http://www.mcpfe.org/resolutions/helsinki>; and UK Forestry Standard.

<sup>15</sup> Forestry Commission & DARDNI (2004) *UK Forestry Standard – the Government's Approach to Sustainable Forestry*. 2<sup>nd</sup> Edition. Forestry Commission & Forest Service, Department of Agriculture & Rural Development Northern Ireland. [http://www.forestry.gov.uk/website/PDF.nsf/pdf/fcfc001.pdf/\\$FILE/fcfc001.pdf](http://www.forestry.gov.uk/website/PDF.nsf/pdf/fcfc001.pdf/$FILE/fcfc001.pdf)

## Access Provision

Forestry Commission Scotland (FCS) needs to work with local authorities, the Scottish Executive and private landowners to promote outdoor recreation opportunities. This will support the Executive's Physical Activity Strategy, should provide enhanced access to woodlands so people are able to take advantage of recreation opportunities and associated benefits near to their homes.

### Priorities for Action

- Work with local authorities access officers to implement their duty under the Land Reform (Scotland) Act 2003 to draw up core path networks and assist communities in developing path networks and access more generally.
- Ensure, through forest design, that there is permeable access through the woodland to the wider countryside

## Forestry Practice

Location, design and management of forestry can have a major impact on maintaining and enhancing the landscape. It is now accepted that there were some areas of publicly-owned commercial afforestation which would not have been planted with today's hindsight and some of which may now be uneconomic to harvest.

We would like to see these habitats restored with associated benefits for access and biodiversity. In addition, whilst we appreciate that deer have a role to play in the Scottish landscape, their management, through fencing, has implications on biodiversity and for those enjoying access to Scotland's woods and forests. This could be tackled through more effective use of collaborative deer management.

### Priorities for Action

- A commitment to withdrawal of inappropriately sited commercial forestry which will result in ecological and amenity gains
- Work with the Deer Commission Scotland to reinvigorate the Deer Management Planning process and the use of fencing as the exception rather than the rule

## Integration with other Scottish Executive Strategies and Departments

In addition, we have drawn up a number of strategies which we would like to see the review to tie in with. These include:

- Scottish Biodiversity Strategy
- Scottish Sustainable Development Strategy
- Scottish Climate Change Programme
- UK Biodiversity Action Plan
- Physical Activity Strategy
- Scottish Rural Development Plan

We would also like to see the strategy developed in conjunction with colleagues from the following areas:

Department	Area
Health	Recreational activities in forests results in reductions in heart disease, stress and obesity Improvement in air quality helps fight respiratory diseases (eg asthma and bronchitis) in urban areas NHS Scotland – woods around hospitals
Education	Outdoor education, developing skills for forest jobs
Energy/Enterprise	Energy Saving Trust, Renewables (for heat)
Planning	Protecting semi natural habitats, anticipated role for FC in planning applications through new Planning Bill
Sustainable Development	Public & private sector specification & procurement of Forest Stewardship Council timber/wood products; increased uptake of UKWAS certification
Environment and Rural Development	Development of LMCs and the new Scottish Rural Development Plan, fulfilling commitments under the Scottish Biodiversity Strategy. Connect with the revised Scottish agriculture strategy.
Transport	Rail and sea transport for timber

**End of consultation response**