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Dear Bob,

### **The Role of the Public Forest Estate in Scotland**

Thank you for your letter of 17 October asking for our comments on your discussion paper *The Role of the Public Forest Estate in Scotland*, as a background to the review of the *Framework Document for Forest Enterprise Scotland*.

Scottish Environment LINK's view is that the **primary role of Scotland's national forest estate is the protection and enhancement the environment, through the provision of environmental and social public benefits**. This is backed up by **demonstrating exemplar best practice, and supporting local communities and economies**.

We are supportive of the role that the State Forest will play in the delivery of the revised Scottish Forest Strategy. We feel this is best expressed through **the delivery of public benefits, including the protection and enhancement of biodiversity, the historic environment, improved recreation opportunities and landscape**. It is important this encompasses targeted work for high value nature, archaeological and landscape conservation areas, including designated and non-designated sites and features.

There needs to be **enhanced biodiversity work in state and public sector woodland, meeting Scotland's national, UK, EU and international biodiversity commitments**. This includes improving the biodiversity condition of native woods – to meet UK Biodiversity Action Plan targets and designated site condition - restoring important semi-natural habitats, both ancient semi-natural woodlands sites (PAWS), and priority open ground habitats, such as active blanket and raised bogs, that are currently forested, or being adversely impacted by neighbouring state forestry.

There needs to be a strategic approach to the restructuring of key existing forestry plantations for priority species, such as black grouse. We would like to see the development of transitional habitats and habitat networks, both open-ground as well as for forests.

The recent ratification of the **European Landscape Convention** and the identification of **Managing the historic environment** as part of the Key Theme of **Environmental Quality** (and publicly endorsed by the Minister at **the Scottish Forestry Strategy launch**) have highlighted the importance of these elements of our countryside. This should be recognised

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by a more explicit programme to identify, protect and promote to the public the landscape and the historic environment within the National Forest Estate. This should include not just archaeological and historic sites, but also landscape elements and geodiversity, as well as the heritage intrinsic in the woods themselves.

The National Forest Estate needs to **develop the provision of publicly accessible woodland for environmentally responsible recreation**, and improve the permeability of the upper forest edges. Forest management must be fully integrated with local authority access strategies and core path planning. Such access and recreation may have economic benefits too.

Scottish Environment LINK hopes that Forestry Commission Scotland will **fully implement the recommendations of the 2006 Scottish National Forest Estate Environment Review Group**. This requires clear biodiversity targets in revised Forestry Commission Scotland Forest District Strategic plans, backed up by suitable budgets to ensure effective, targeted delivery on the ground for priority biodiversity. This includes action for woodland and non-woodland priority species and habitats.

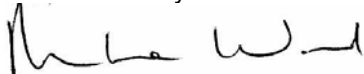
Scottish Environment LINK supports **the continued certification of the Scottish National Forest Estate under the UK Woodland Assurance Standard**. We would like other state and public woodland managers, such as Scottish Natural Heritage and local authorities, to follow FCS's lead and certify the woodlands they manage to UKWAS.

We support a **flexible approach to the disposal and acquisition of land** to achieve a shift in emphasis towards enhanced delivery of public benefits, provided the public benefits which arise from those woods that are sold are protected and enhanced. This approach could be innovative with land transfer, so that public money is not wasted on buying and selling, particularly between public bodies.

We are concerned about **the current development pressures and actual development on the National Forest Estate**, for example for windfarms and housing. We are concerned that the state forest is being considered by the Scottish Executive as a land bank for development, outwith the public benefit considerations of the Scottish Forestry Strategy and Scottish Biodiversity Strategy.

We would welcome the opportunity to meet to discuss this matter, including exploring the public benefit aspects of the three options ('directions') outlined in your paper.

Yours sincerely



Mike Wood (RSPB)

On behalf of the Scottish Environment LINK Woodland Task Force

The following Scottish Environment LINK member organisations support this statement:

- Council for Scottish Archaeology
- Ramblers' Association Scotland
- Reforesting Scotland
- RSPB Scotland
- Scottish Native Woods
- Scottish Wild Land Group
- Scottish Wildlife Trust
- Woodland Trust Scotland