

# Response to Forest Enterprise Scotland consultation of the Strategic Directions for the National Forest Estate

by the Scottish Environment LINK Woodland  
Taskforce

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## Summary

- The strategic direction needs to be much more clearly stated in the document.
- There is a disconnect between the majority of the document which has set out the change of direction of the NFE over the last few decades, how these strands will be taken forward and then the priorities at the end of the document which seem much more limited in scope, do not appear to refer to the previous commitments and do not provide any performance measures or targets.
- The strategic direction of the NFE must take into account the delivery of public benefits, including the protection and enhancement of biodiversity, the historic environment, improved recreation opportunities and landscape.
- The strategy should clearly deliver against the principles of the Scottish Land Use Strategy, the Scottish Biodiversity Strategy, as well as the Scottish Forestry Strategy.

## Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations. LINK has over 30 member bodies representing a broad spectrum of environmental interests. We have a common goal of contributing to a more environmentally sustainable society.

LINK members welcome the opportunity to comment on this consultation on the Strategic Direction of the National Forest Estate in Scotland.

We have however found this consultation difficult to respond to. The strategic directions paper is a mixture of background about Forest Enterprise Scotland (FES), explanation of changes and repositioning in recent history, examples of existing good practice on the National Forest Estate (NFE), and reiteration of existing commitments from the Scottish Forestry Strategy (SFS). Nevertheless, the document is well presented, is a good communications piece for people unfamiliar with FES and the NFE, and it is difficult to disagree with many of the intentions it sets out. The document highlights the best of FES and accentuates the importance of delivery of public benefits. It is not immediately clear what the strategic direction going forward is, although there are references to existing good works on the estate and ongoing commitments. LINK believes that the strategic direction for the NFE should be much more clearly stated in the document.

The consultation asks for views on the proposed communication approach, the strategic directions and management principles for the NFE, whether there are gaps or omissions, and how partners and stakeholders might get involved. We have set our thoughts on these areas by using the headings from the strategic directions document to help group our comments.

### **Strategic direction and management principles**

Scottish Environment LINK's view is that the primary role of Scotland's national forest estate should be the protection, enjoyment and enhancement of 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 strongly supportive of enabling and facilitating public access to the estate for recreation and public enjoyment of the estate.

We are supportive of the continued role that the national forest estate will play in the ongoing delivery of the 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 sites and landscape conservation areas, including designated and non-designated sites and features. Action is also required in urban and rural areas to further use the national forest estate to help resolve problems of physical inactivity amongst the population as a whole.

LINK believes that the FES strategic direction needs to focus on maximising opportunities to deliver its balancing duty in the Forestry Act 1967 (as amended). This balancing duty requires Commissioners to:

- 1 (3A) In discharging their functions under the Forestry Acts 1967 to 1979 the Commissioners shall, so far as may be consistent with the proper discharge of those functions, endeavour to achieve a reasonable balance between—
  - (a) the development of afforestation, the management of forests and the production and supply of timber, and
  - (b) the conservation and enhancement of natural beauty and the conservation of flora, fauna and geological or physiographical features of special interest.

It is LINK's view that there is still a need to extend further, and improve the integration of, sentence (b) into the day to day management of the NFE at a district by district level to produce high quality, high priority public benefits more extensively.

This raises questions about the long-term environmental sustainability of the design, location, silvicultural approaches and systems employed, and the overarching forest management objectives of the National Forest Estate.

A National Forest Estate for Scotland main focus must be producing public benefits, enhancing Scotland's important wildlife, historic environment, landscape conservation, access and recreation opportunities for people.

There has been important and ongoing progress made, particularly as the estate was established without any consideration of environmental impacts or having any environmental objectives in its management. However, Scottish Environment Link

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considers further work is needed with stronger strategic direction for public benefits for the National Forest Estate, backed up by budget, targets and carried through to forest design and management.

Currently the nature of the resource, primarily softwood plantations, is driving the aspirations for the National Forest Estate, rather than a longer-term view of what kind of National Forest Estate Scotland needs to exist to deliver public benefits. The National Forest Estate must more fully meet the Scottish Government's existing wildlife, historic environment, landscape and access commitments, which for example point to more action needed to restore important semi-natural habitats such as ancient semi-natural woodland and peatland. There are also future challenges of climate change adaptation for biodiversity that need addressing.

This longer term challenge of the types of woodland, the methods and objectives of their management that need to make up the National Forest Estate is a key issue that we would like to see better addressed in the development of FES's Strategic Directions. We do not think that this means further emphasis on non-native softwood conifer production focused on timber, using a limited number of species and forest management approaches, some of which are on environmentally sensitive sites, with some 'concessions' to delivering public benefits.

Scottish Environment Link would welcome the development of a National Forest Estate of mixed woodland with predominately native tree species, greater diversity of vegetation structures and deadwood habitats, which is carefully located, designed and managed to optimise public benefits. This may also result in a more resilient resource in terms of climate change adaptation and plant health. This requires an overhaul of strategic directions of the estate and a step change in forest location, design and management beyond existing welcome, but limited, restructuring approaches and high profile projects which are constrained by the plantation forest resource and its overarching timber production aspirations.

We note the recommendations of Forestry Commission's own Environment Review<sup>1</sup> in terms of the need for greater diversity in woodland types and management approaches, more nativeness in trees and habitats, and enhanced delivery of public benefits. What progress has been made?

There also may be scope to develop the outreach role of Forest Enterprise staff to help deliver public benefits off-site, for example through training and support on ecological survey, management planning, and certification, as well as further develop co-operation and collaborative forest management approaches. We would particularly welcome such outreach work to develop restoration of native woodland and peatland habitats, including to help generate appropriate woodland management approaches, markets and harvesting to improve the wildlife quality of priority native woodland habitats that may be out of management and in small or isolated patches. This could help foster development of a more diverse woodland management culture and provide social, environmental as well as economic benefits to local communities.

### **Productive forest management**

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<sup>1</sup> See: <http://www.forestry.gov.uk/environmentreviewsotland>



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The document down plays the extent to which this area of FES's business dominates its day to day operations. LINK accepts that there is a legitimate role for commercial forestry in Scotland but wishes to see greater transparency in how FES takes decisions on which public benefits it delivers, how its budget is spent and what forest management priorities it is pursuing. In particular we would like to see more accessible and transparent annual accounts for FES. We believe that clearly setting out the costs of the important work FES does, alongside the income it generates, will help demonstrate its value as a state forest service, and allow an open discussion of the benefits of its role in species, habitat, landscape and cultural conservation, and outdoor recreation. At times the public accounts for FES can feel a bit like smoke and mirrors.

Scottish Environment LINK is very supportive of the continued certification of the Scottish NFE under the UK Woodland Assurance Standard (UKWAS). We encourage FES to demonstrate exemplar UKWAS compliance in all its operations. FES should work closely with the Forestry Commission Scotland (FCS) to promote and support non-state woodland managers to enter certification schemes. We would also like also 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.

### **Realigning assets**

LINK supports a flexible approach to the disposal and acquisition of land. We believe it should seek to achieve a shift in emphasis towards enhanced delivery of public benefits, provided the public benefits that arise from woods that are sold, are protected from degradation and are enhanced for the future. This approach could be innovative with land transfer, so that public money is not wasted on buying and selling, particularly between public bodies.

LINK is open to the idea of alternative management models, including partnership agreements, leases and sales, so long as the high environmental standards and access arrangements expected of FES are also required of the new managers or owners. In particular we are supportive of FES pursuing opportunities for increased NGO and community woodland management on the NFE. This may be in the form of lease agreements with community co-operatives as well as sales through the National Forest Land Scheme.

Scottish Environment Link does, however, consider that the National Forest Estate should not be viewed by the Scottish Government or Forestry Commission Scotland as a land bank for development. Genuinely sustainable development can be considered but needs to undergo rigorous assessment to ensure it is not detrimental to other government aims and policies.

### **Spatial planning strategy**

LINK believes that an estate-wide spatial planning strategy, considerate of and integrated with other local planning strategies, would help target delivery of public benefits across the estate. Working with partners at a landscape scale, such as the Great Trossachs Forest, give the maximum opportunity for delivering FES's broad objectives and for delivering against the Forestry Act balancing duty.

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LINK would welcome Forest Enterprise Scotland carrying out Environment Impact Assessment of its Forest Design Plans, alongside Strategic Environmental Assessment of its Forest District Strategic Plans. We think that the 'management plan' defence is no longer a robust justification for FES being exempted from environmental assessment for forest management and expansion. It is important that environmental impacts of forest expansion and management are assessed both cumulatively and at a site level – FCS as a regulator must ensure this happens across all state, public as well as private woodland. Link has concerns that the current woodland expansion agenda may result in a less environmentally robust approach to assessment of environmental impacts.

We welcome the continued consultation of Forest Design Plans through early public discussion processes and placing draft proposals on the Public Register to satisfy FES's own forest management practice guidance requirements, UKWAS certification as well as Forestry Act requirements.

### **Accessible**

LINK is supportive of the statement that FES will engage with local communities. Many of our member organisations find this brings a wide range of benefits, often on both sides. For example, getting volunteers to help clear litter or clearing undergrowth from paths (using existing groups such as local Ramblers or community groups, or setting up "Friends of X Forest"). This adds to the feeling of ownership and acceptability of FES's plans for the area. Active community engagement helps break down feelings of 'them and us'. We are aware that FES has increased its engagement with local communities in recent years, but feel more could be done. It would also be helpful if liaison with local community interests was also seen to encompass local NGO engagement. We would like to see reference made in the Strategy to the equality agenda and how the Equalities Act will be taken forward in the NFE.

LINK recognises the extra investment in recreation zones but argue that this should not mean that the rest of the forest estate is not also promoted for recreation use. There is value in creating tourism hubs with facilities to open up access to the public, but there must be a welcoming approach, combined with appropriate management input, across the whole estate. When carrying out forestry operations, FES should seek to minimise access restrictions that should be proportionate to risk and only applicable when actual management operations are being undertaken.

LINK members have in recent years experienced mounting problems with issues such as the removal of way marking and with a lack of communication relating to the closure of paths when forestry operations are being carried out, inadequate consultation on the erection of deer fencing and lack of action in the maintenance of paths.

There is mention in the document of car parking charges, we are aware this is becoming more of a concern. LINK believes the introduction of charges should be consulted upon, particularly with local stakeholders. A transparent account of where the revenue is being spent may help to engender support for visitor contributions. Outdoor recreation stakeholders need to be involved in the decisions on how such funding is spent. Furthermore, there are some doubts as to whether parking charges are justifiable on the NFE given the wider objectives of trying to increase access to the outdoors by all sections of society.



With regard to the use of deer fencing, this should always take into account the needs of recreation users who are likely to approach the fence from all directions. We also believe that effective deer management should look to reduce grazing pressure through a mixed management approach intended to benefit biodiversity and properly considering public access. We feel that there is the need for a review of the relationship between the NFE and the management of deer populations in Scotland. There is still a need for better balancing of increasing deer culling, the use of deer fencing as part of forest establishment and management, and open access.

LINK would like to see a strategic access approach and action plan for the whole NFE. We would like to see the approach establish operating principles on how access is delivered across the estate, both in opening up new opportunities, and in managing ongoing forest operations, and policies covering aspects such as deer fencing, parking charges or holding events within the NFE.

### **Cared for**

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, capercaillie, juniper and pearl-bordered fritillary but also Scottish Biodiversity Strategy priority species which are not in the Scottish Forestry Strategy, and restoration of priority habitats, such as native pine woods and upland oakwoods. We would like to see the development of transitional habitats and habitat networks, both open-ground as well as for forests, conservation of existing montane scrub and the establishment of more scrub on the estate. We do not feel that this strategic approach is clearly expressed in the document.

In 2006 the Scottish National Forest Estate Environment Review Group published a report setting out a series of recommendations<sup>2</sup>. LINK would like to see what progress has been made against these recommendations, six years on, and wish to see the strategic plan for FES champion the recommendations. This would require 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. Some inclusion of the group's recommendations as progress indicators would be helpful.

In relation to archaeological sites, we would like more explicit reference to both scheduled and unscheduled sites. The document appears only to address scheduled monuments and it must address both.

### **Healthy**

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<sup>2</sup> See: <http://www.forestry.gov.uk/environmentreviewscotland>



The healthy section of the document does not mention much on dealing with pests and diseases on the NFE. LINK believes that management strategies to deal with these problems need to include the views of all NFE users and focus on the wider public interest rather than just the commercial forestry sector. Specifically we are concerned that larger scale disease control, particularly from the air, could have wide ranging effects beyond that of disease treatment. We advocate careful scientific monitoring of the effects of any treatments and stress that the objectives of the FES must go further than managing the commercial timber crop. We would suggest that this should encourage even more movement away from growing monocultures.

### **Good value**

The Environment Review of the National Forest Estate carried out in 2006 stated that, "The net cash funding regime, within which the agency operates, tends to subordinate the delivery of public benefits to the generation of income. This trade-off between income and delivery of public benefits should be exposed to transparent debate at a national level and not hidden in the operational budgets of FCS." LINK believes that there has not been much progress on this issue and that it still needs to be addressed. As mentioned earlier in this response, we would welcome clearer, more detailed and accessible reporting of the income and expenditure for the NFE.

### **Monitoring and reporting**

We agree that the FES has an important role to play in "Safe guarding 'national forestry treasures'". In order to help demonstrate how FES is achieving this goal, we would like to see comprehensive monitoring and reporting of habitats, species and historical assets across the estate. We believe that the monitoring and recording of information should be possible from the delivery and monitoring of forest district plans. By monitoring what is going on at a local level, accurate reporting at a national level will be more achievable. It will also help support the case to justify the important breadth of work FES delivers with public money.

Specifically we would like to see annual monitoring and reporting for the NFE on:

- Progress on plantation on ancient woodland site (PAWS) restoration;
- Progress on open ground habitat restoration;
- Progress of peatland restoration;
- Progress on managing & enhancing archaeological sites; and
- Status of priority species and priority habitats.

In order for ongoing assessment of progress, it will be necessary to establish current baselines for the estate and make them publicly available. This should include hectareage of native woodland and degraded habitats, visitors numbers etc. Performance measures should also be included in the document.

### **Summing up**

As publicly owned and publicly funded land, the National Forest Estate offers a unique opportunity to manage and conserve finite natural and cultural assets. LINK's clear view is

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that the management of the NFE must provide exemplar land management practice both for woods and forests, and for the other habitats and landscapes that it is responsible for. As custodians of the NFE, FES has a duty to the public as well as a legal obligation to protect and enhance the natural environment. Covering about 9% of Scotland, the NFE also has a huge opportunity to deliver against the Scottish Land Use Strategy. The strategic direction of the NFE must take into account the broad range of public benefits, across different habitats and landscapes, to better integrate forest and woodland management, species and habitat conservation, protection and restoration of degraded habitats, preservation of the historic environment and improvement of public access and recreation.

### **This response was compiled on behalf of the Woodland Taskforce and is supported by:**

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