

Response to the Woodland Expansion Advisory Group call for views

by the Scottish Environment LINK



Date: 6 January 2012

Summary

- LINK believes that the resolution of land use conflicts can be helped by a Land Use Strategy that offers mechanisms and processes for dealing with land use conflicts. LINK does not believe we have this yet but is hopeful that the LUS Action Plan will help to improve matters.
- CAP reform will to have a strong impact on how Scotland's land is managed in the years to come. LINK continues to advocate that the allocation of public money should be based on the broadest range of public and environmental benefits. This is best achieved by approaching land management in an integrated, cross-boundary approach.
- The importance of compliance with existing regulations, guidelines, standards and policies for the location and design of woodland expansion and forest management, can seem undervalued and poorly applied. LINK wishes to see stronger adherence to the existing standards and believes that better adherence would help to resolve conflicts in land use.
- LINK wishes to see more effective use of indicative land use and woodland expansion plans/strategies, which are designed to create habitat networks and landscapes that protect core priority sites, and integrate with other habitats and environmental features (including cultural assets) in a holistic landscape.

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

LINK members welcome the opportunity to express our views to the Woodland Expansion Advisory Group. We are pleased that the important issue of woodland expansion conflicts are being publicly addressed.

Introduction

LINK broadly supports the Scottish Forestry Strategy's aspiration to expand woodland cover to around 25 per cent by the second half of the century. More specifically we are very supportive that, "Native tree species comprise about 35 per cent of the total forest

area, in a network of functioning woodland and non-woodland habitats that span the valley bottoms to natural tree lines”¹ by the middle of this century.

There are however many demands on Scotland’s land and there is no silver bullet to resolve land management conflicts. LINK is a strong supporter of an integrated sustainable land use approach. By that we mean land management approaches that take account of environmental limits and resilience, and that protect them from further degradation. This encompasses working at a site specific scale, across site boundaries and at a landscape-scale. This is achieved by working in partnership and with sound advice, adequately funded to deliver the maximum public benefit.

We would like to see landscapes with well-managed, joined-up, diverse and resilient woodland resource, maximising the potential for woods and trees to deliver biodiversity and the other ecosystem services. This means protection and restoration of woods of high biodiversity value (e.g. ancient woods, UK Biodiversity Action Plan priority woodland habitats and priority species, designated sites), and an increase in native tree cover while protecting priority open ground habitats, sites for key wildlife species, historic environment features and designated sites. We would like to see many more areas of Scotland meeting the Woodland Access Standard², both for existing and new woodland.

LINK has called for a Land Use Strategy (LUS) for many years. It is reassuring that tensions over woodland expansion are being addressed through the strategy. In addition to LUS, the Scottish Government also has statutory duties to biodiversity, sustainable forestry and carrying out climate change mitigation and adaptation in a sustainable manner. This is required under Section 1 of the Forestry Act 1967, Section 1 of the Nature Conservation (Scotland) Act 2004, and Sections 44 & 59 of the Climate Change (Scotland) Act 2009. All of these need to be taken into account by all parts of government and its agencies, when decisions on woodland expansion are made.

Question A

Where do you see opportunities for woodland expansion that are not currently being taken up? What do you think is stopping such woodland expansion?

Increasing tree and woodland cover was recognised by the UK National Ecosystem Assessment³ as one of the measures which could be used to increase delivery of ecosystem services in a number of areas. Woodland expansion is important to Scotland’s future but it should not be achieved at the expense of other priority open habitats, sites for priority species, biodiversity, landscape and cultural heritage, or public access. See our answer to question 2 for more information.

LINK’s view is that woodland expansion should be a key tool in delivering fully functioning habitat networks, linking woodland habitats to increase their resilience to environmental change but at the same time protecting the integrity of other important habitats, delivering targeted high quality public benefits for priority wildlife species, priority

¹ Scottish Government. (2006) *The Scottish Forestry Strategy*. Edinburgh. ISBN: 085538705X. Page 16.

² Woodland Trust. (2010) *Space for People*. www.woodlandtrust.org.uk/publications.

³ UK National Ecosystem Assessment. (2011) *The UK National Ecosystem Assessment: Synthesis of the Key Findings*. UNEP-WCMC, Cambridge.

habitats, designated sites, historic environment, landscape conservation and access for informal recreation and environmental education. Adopting a planned approach, based on survey and management practices appropriate to maintaining and enhancing full woodland diversity, is important to ensure that Scotland's wildlife habitats and species, landscape and cultural history are in good shape for the next millennia. Below are a number of areas where this can be achieved:

- **Forestry and Agriculture.** An increase in tree cover on farms has been shown to support productive farming⁴. For example: providing shade and shelter; increasing food efficiency; helping soil protection; reducing wind damage to crops; and providing an alternative source of on-farm energy and timber. In order to maximise these benefits, we need to re-evaluate forestry in an agricultural landscape. Individual tree management in urban areas is well practised but there is less focus on the importance of scattered trees, shelter belts and hedgerow trees in the rural landscape. These 'trees outside woods' contribute both to productive agriculture and to ecosystem services such as water management, biodiversity and cultural landscapes. The increased opportunities that wood pasture can provide for landscape, livestock, biodiversity, water regulation and forest products are an example of how changing the way we think about woodland expansion can deliver multiple benefits.

Food security is currently seen as a high priority but it need not be a barrier to land being allocated to trees and woods. LINK supports the introduction of an enhanced advisory service that combines advice on land uses, better integration of the grants system, and maximising public benefits from public funding. This should provide subject specialist and conservation advisors. The service should balance agricultural grants with grants for forestry, biodiversity, access, landscape and heritage management, and should target areas where the multiple benefits will be most readily achieved.

It is vital, however, that woodland expansion on farms takes place in a way that protects and enhances wildlife – this is currently not always the case, with important wader habitats being considered for planting and no consideration of cumulative environmental impacts. Meanwhile the biodiversity of existing native woods on farms may need improving. LINK also has concerns that the Scottish Government does not require UK Forestry Standard compliance for all woodland planting and management on farms.

- **Climate Change Adaptation.** An increase in woodland cover would enhance the opportunity for woodland dependent wildlife species to adapt to existing and future climate change. Ideally the creation of new native woods next to existing woods of high nature conservation value would provide the maximum benefit by increasing core areas. A landscape-scale approach will improve the function of ecosystems. Once the UK Climate Change Risk Assessment is complete, a statutory Adaptation Programme will be drawn up for Scotland. LINK believes that Scotland's Climate Change Adaptation Programme should include emphasis on ecological adaptation. Incentives are required to prioritise woodland creation where it will enable landscapes to function in such a way as to allow the maximum potential for

⁴ Woodland Trust. (2010) *Tree planting and woodland creation of farms*. Available at: <http://www.woodlandtrust.org.uk/en/campaigning/our-views-and-policy/agriculture/Documents/trees-for-farms-document.pdf>

woodland and open habitat species to evolve, adapt or alter their distribution in response to changing climatic conditions.

- **Complexity of SRDP grants.** From a forestry perspective, SRDP is complex, bureaucratic and inflexible. The application process is onerous, confusing and difficult. Only highly motivated landowners or those who have an agent are likely to apply. Pulling together woodland proposals for SRDP can be expensive, especially for small schemes or large or marginal sites where significant information is required before a scheme is assessed. High development costs without an indication of a positive result can be off-putting. For straight forward schemes this is less of an issue. By reducing the complexity of grant application and claims, more landowners will apply. For large scale or marginal sites an early indication of whether the scheme is likely to be favourably considered would give landowners more confidence to invest in the application process.
- **CAP Reform.** Forestry has long seemed the poor relation when compared with the financing of agriculture. Yet forestry can deliver as many public goods as agriculture. Experience has shown that, except for good advice, the major determinant in the decision to plant trees is getting the finances right. The proposed loss of income foregone payments for woodland creation in the new CAP may seriously challenge the economic viability of tree planting for many landowners. As a management payment will be offered instead of the income foregone calculation, it will be vital that the proposed management payment is as good as the income foregone calculations and that those converting agricultural land still retain the basic farm payment which is applicable to all eligible agricultural land. Reform of the CAP and agri-environment schemes should do more to protect and expand tree cover in the landscape, as part of a wider programme to build up a resilient rural environment. In addition, the potential for economic management of native woodlands (e.g. for biomass) needs to be considered to help deliver public benefits, for example wildlife restoration and enhancement. It is not only exotic tree species that are able to produce commercial crops and LINK supports the active management of productive native woodland appropriately situated on farms.
- **Restoration of Plantations on Ancient Woodland Sites (PAWS).** Expansion of the native woodland could also be achieved by full implementation of the PAWS restoration ambitions of the Scottish Forestry Strategy⁵. The restoration of many thousand hectares of ancient and long-established woods that were planted with non-native conifers would be one of the most important contributions we could make to woodland nature conservation and increasing the area of native woodland. The longer this is delayed, the less likely it is to succeed. LINK supports the use of incentives for PAWS restoration and low impact silvicultural systems for planted ancient and long established woods.

⁵ Scottish Government. (2006) *The Scottish Forestry Strategy*. Edinburgh. ISBN: 085538705X. Page 48.



Question B

Examples of where woodland expansion comes into conflict with other land management objectives. We are particularly interested to hear where current regulatory and consultation mechanisms do not seem able to prevent such conflict.

We have tried to group land management conflicts into six areas that our members are involved in.

Nature conservation and biodiversity

While sympathetic woodland expansion can bring benefits to nature conservation and biodiversity, there is also potential for other priority habitats and sites for priority species to be lost. For example: if trees are planted on priority botanical sites⁶, or on wetland or terrestrial habitat suitable for amphibians and reptiles or wading birds, or priority open ground habitats such as peatland and semi-natural grassland.

Priority non-woodland habitats and sites for priority species have an important part to play in the protection and survival of many of Scotland's iconic habitats and species. Woodland creation and expansion should be subject to careful assessment of proposed planting sites to ensure priority habitats or species are not threatened by the change in habitat condition⁷. New woodland should therefore be carefully located away from these habitats and sites. Better still the management of these habitats and sites should be included in forest plans and in cross-boundary and landscape-scale management. Habitats of particular note are blanket and raised bog, semi-natural grassland, some moorland, sites for breeding wading birds and raptors. This should include designated and non-designated sites.

In addition, the biodiversity of existing priority native woodland habitats needs to be protected, restored and enhanced. The expansion of native woods to meet the UK Biodiversity Action Plan and Scottish Biodiversity Strategy targets would help to achieve this.

Archaeology and cultural heritage

There are legitimate concerns that areas targeted for new woodland are likely to be in the marginal land used for extensive grazing in the upland zone. These areas are where most upstanding historic environment remains survive. We recognise that conflicts over land use arise and that is why we support a holistic Land Use Strategy approach. Understanding of these issues is better than in the 1970s and 80s, and there is now recognition through the Land Information Service (LIS) and the Environmental Impact Assessment (EIA) process, that there are multiple interests involved. However the execution of policies like *Right Tree in the Right Place* still raise concerns about the level at which they are being implemented. In our experience, historic environment advice to forestry proposals depends on: access to good quality polygonised datasets; access to professional and consistent advice from local authority historic environment officers or agents supporting councils; the ability of local conservation and woodland officers to

⁶ Further information available at: www.plantlife.org.uk/wild_plants/important_plant_areas/

⁷ Long, D. (2011) *Quality and quantity: revitalising Scotland's woodlands*. Plantlife. www.plantlife.org.uk/scotland

assess the implications of forestry developments on this resource; and consistent verifiable standards in plans adopted under the Woodland Expansion Programme.

Inappropriate expansion risks the potential loss and damage of archaeological sites, historic landscapes and palaeoenvironmental deposits. This is most notable where heather moors and associated bogs are drained for afforestation, and where archaeological sites are not scheduled.

Landscape and access

While many Scottish landscapes have the capacity to absorb new woodland and indeed will be improved by new planting, there is a concern that the need to consider landscape will be forgotten in the current drive to expand woodland. LINK would direct WEAG to the considerable body of expertise and best practice available to advise and guide on the design and locations for new planting which enhances landscapes.

Woodland expansion infrastructure still continues to present access concerns. Deer fences in particular can pose an obstacle to access for people using and enjoying the countryside. Areas of new woodland need careful consideration and a requirement to install appropriate and sufficient crossing points must be an integral part of woodland expansion planning. Consideration of access must not be restricted to where there are paths or tracks but considered, as required under the Land Reform Act, as a general duty on authorities. In addition, fencing, where required, should have regular crossing points to take account of these statutory rights of access. Good forest design plans for the creation of path networks within woodland and if done at an early stage it enables walkers' better access to woods.

More challenging still is the effect on landscape and visual amenity by any associated tracks and the method used for planting which can have a significant impact depending on the techniques used, for example, mechanical bucket size and the use of hand planting in sensitive areas. LINK believes that woodland expansion should not be responsible for damage to the landscape through construction techniques or formed-by-use tracks. There are plenty of good examples of appropriate woodland access to draw upon.

Carbon and peat

LINK has said many times before that it considers woodland expansion for carbon sequestration to be only one of the multiple benefits planting trees can provide. We are not supportive of carbon sequestration being the sole driver for woodland expansion⁸ and we believe that it may be counter-productive if woodland is established on peat soils.

Forestry Commission Guidelines exist (*Note 1 – Forests & Peatland Habitats*⁹), but they are now completely out of date in the light of new knowledge about the negative impact of tree planting on peat soils. They currently advise against planting on areas over 25 ha of deep peat (greater than an average of 1m depth), but we now know that planting on smaller areas of shallow peat and possibly also peaty gleys is likely to cause long term damage to carbon storage. There is an urgent need to revise the guidance and to carry

⁸ Scottish Environment LINK. (2008) *Policy Briefing on Forestry policy and carbon sequestration in Scotland*. <http://www.scotlink.org/files/policy/PositionPapers/LINKwtfPositionCarbonSeq08.pdf>

⁹ Patterson, G. & Anderson, R. (2000) *Forests and Peatland Habitats*. Forestry Commission, Edinburgh. [http://www.forestry.gov.uk/pdf/fcgn1.pdf/\\$FILE/fcgn1.pdf](http://www.forestry.gov.uk/pdf/fcgn1.pdf/$FILE/fcgn1.pdf)

out further research on the impact of planting trees on peat soils. If followed, it is likely that this would severely restrict the planting of further woodland in upland areas.

LINK supports the recommendation that was made to Forestry Commission Scotland in its own research¹⁰ to redefine 'deep' peat as 45cm in depth, as well as minimising disturbance to peat soils. We also note that this research highlights that by not restocking deep peats at the end of forest rotations would only impact 11% of Scotland's woodland cover but be 27% of the total forested peat stock – so this would have the potential to be a major climate change mitigation as well as biodiversity restoration measure (see point 6 on page 39). LINK notes that Forestry Commission Scotland has an interim guidance note on planting on deep peats – see Annex A¹¹ of Understanding the GHG implications of forestry on peat soils in Scotland - we would like this policy guidance note to be revised with a change to the definition of 'deep' to 45cm, better definition and protection for 'exemptions' and a commitment to stop restocking on deep peats. We do, however, support this policy statement's headline commitment to a presumption against afforestation of deep peats.

Deer management

The proposals for woodland expansion have significant implications for deer management. High deer numbers can cause significant damage from both browsing and trampling. There may also be additional impacts on species related to deer and woodland management practices. For example: the need to protect young woodland with deer fencing may result in fatal fence collisions by capercaillie and black grouse; natural vegetation structure and floristic diversity being severely compromised by excessive numbers of deer¹²; and vehicle collisions.

Where fencing is used to protect establishment, there are potential negative impacts on access and landscape. The newly introduced Code of Practice on Deer Management and the evolving lowland deer network potentially provide a voluntary framework for deer management but are unenforceable. LINK still believes that without a legal obligation for land owners to manage deer sustainably, it is likely that we will continue to see adverse impacts on woodlands and open habitats. Serious consideration therefore needs to be given to deer management planning for woodland expansion both within targeted areas and on adjacent land.

It is reasonable to expect that there will be further increases in red, roe and sika deer populations as a result of the proposed woodland expansion. This will particularly be the case with roe and sika deer, which tend to favour woodland habitats, and as a consequence their populations are harder to manage than red deer. However, there may also be issues surrounding red deer populations in Scotland from forest expansion, since red deer in Scotland are usually managed in the open hill range. Increased woodland

¹⁰ See first bullet point on page 41 of: Morison, J., Vanguelova, E., Broadmeadow, S., Perks, M., Yamulki, S. & Randle, T. *Understanding the GHG Implications of Forestry on Peat Soils in Scotland*. October 2010. Report to Forestry Commission Scotland. Forestry Commission Forest Research, Edinburgh.

[http://www.forestry.gov.uk/pdf/FCS_forestry_peat_GHG_final_Oct13_2010.pdf/\\$FILE/FCS_forestry_peat_GHG_final_Oct13_2010.pdf](http://www.forestry.gov.uk/pdf/FCS_forestry_peat_GHG_final_Oct13_2010.pdf/$FILE/FCS_forestry_peat_GHG_final_Oct13_2010.pdf)

¹¹ Forest Research (2010) *Understanding the GHG implications of forestry on peat soils in Scotland*. Available here:

[http://www.forestry.gov.uk/pdf/FCS_forestry_peat_GHG_final_Oct13_2010.pdf/\\$FILE/FCS_forestry_peat_GHG_final_Oct13_2010.pdf](http://www.forestry.gov.uk/pdf/FCS_forestry_peat_GHG_final_Oct13_2010.pdf/$FILE/FCS_forestry_peat_GHG_final_Oct13_2010.pdf)

¹² Carey, P.D. et al. (2008) *Countryside Survey: UK Results from 2007*. NERC/Centre for Ecology & Hydrology (CEH Project Number: C03259).

cover in some areas may reduce the ability of red deer managers to maintain deer populations at a sustainable population level.

LINK understands that the expected deer population response to proposed forest expansion has not yet been modelled. LINK believes this work is necessary and should be completed so that the full range of public policy implications can be fully understood, and appropriate measures put in place to deal with issues arising.

LINK recognises that well designed woodland habitats will bring biodiversity benefits to some species and habitats. However the conservation concerns mentioned also have the potential to be exacerbated by increased woodland cover.

Question C

The way that conflicts between woodland expansion and other land management objectives could be better resolved in future. We are looking for practical and constructive suggestions which respect the diversity of land uses in Scotland.

The UK National Ecosystem Assessment (NEA) report notes that the expansion of woodlands has already contributed substantially to ecosystem services; and they still have much to offer. Likewise the United Nations report on '*The Economics of Ecosystem and Biodiversity*' (TEEB) demonstrates that the importance of trees and forests is vastly greater than just timber supply: regulating the atmosphere, in climate and water cycles, soil conservation, and supporting a disproportionate amount of the globe's terrestrial biodiversity.

LINK believes that in order to reduce land use conflicts related to woodland expansion and more widely, a more holistic approach to land use planning is required. LINK also believes that better implementation and adherence to existing regulations, policies and guidance would help to reduce conflict. These two areas combined should help land managers plan for the future; in business terms and in environmental terms. Not every conflict will be easily resolved but a consistent and open process will help.

Location of woodland expansion

Much of the concern about woodland expansion is focused around the type of woodland and where it is located. While LINK is supportive of woodland creation by planting appropriate sites, a significant contribution towards woodland expansion could be achieved very cheaply in wild land areas through restoration of natural processes by reducing grazing and burning. Natural regeneration of native species is the preferred method of woodland expansion in wild land areas, with interventions where seed sources are absent. Large scale plantations of non-native species are inappropriate in wild land areas and on deep peat soils. Natural regeneration in the presence of deer is possible but requires lower deer numbers than are maintained by many land managers for sport shooting. This raises issues about deer management planning which should be addressed early on in the woodland expansion plans.

Similarly, focusing efforts on native woodland creation around existing woodland biodiversity priority areas and seeking to buffer existing high nature conservation value

woods is a helpful approach. This will help to encourage a mosaic of species-rich habitats, mixing native woodland and open habitats across the landscape. The opportunity to create new habitats should also not be missed. For example, there should also be provision for the creation of suitable habitats networks, such as pond corridors through sites to improve the biodiversity value of the new woodland. This is something FCS has tried at a number of their sites. The application of principles of Forest Habitat Networks is potentially extremely useful in this regard. It should however take account of real priority species – not just theoretical ones in current Forest Research models – and real priority wildlife habitats, both woodland and non-woodland. We welcome Forestry Commission Scotland's recognition of the value of open ground habitat networks and the need to protect them when considering forest habitat network development.

Adherence to existing regulations, standards, guidance and policy

LINK believes that better compliance to existing regulations, guidelines, standards and policies would help to reduce land management conflicts. We believe the Scottish Government, including Forestry Commission Scotland, Scottish Natural Heritage and RPACs must ensure these standards are being met when granting public funds to land managers. Specifically they should ensure:

- The UK Forestry Standard and its associated Forest Guidelines are properly and fully applied. This includes auditing and ensuring compliance, as well as making sure they apply to all woodland expansion, including via agricultural grants and the planning system. Farm woodland management and expansion is currently not properly regulated against the UK Forestry Standard, site specific Environmental Impact Assessment or the assessment of cumulative environmental impacts;
- That high quality indicative forestry strategies are used to target expansion in the right places and of the right types to deliver public benefits. These optional non-statutory planning strategies are being revised as 'regional woodland and forestry strategies'¹³ by local authorities' in-line with revised guidance for local planning authorities. LINK would like to see this process fully implemented;
- That any woodland opportunity mapping takes account of biodiversity and other environmental sensitivities. The Macaulay map used in the development of the Scottish Forestry Strategy¹⁴ does not properly consider impacts on priority non-woodland habitats and species or non-designated archaeological sites – an issue that the subsequent Scottish Forestry Strategy recognised in terms of the location and design of woodland expansion to be done in a sustainable manner to protect and enhance multiple benefits, including biodiversity and landscape;
- Protection for ancient woodland and other priority woodland habitats is a priority. This in particular should be addressed through the planning system.
- That woodland expansion grants are for public benefits. This includes the work of RPACs and SEARS case officers, as well as by Forestry Commission Scotland Conservators.

¹³ Forestry Commission Scotland. (2010) *The right tree in the right place – Planning for forestry and woodlands*. Edinburgh. [http://www.forestry.gov.uk/pdf/fcfc129.pdf/\\$FILE/fcfc129.pdf](http://www.forestry.gov.uk/pdf/fcfc129.pdf/$FILE/fcfc129.pdf)

¹⁴ See topic papers for the second consultation on the Scottish Forest Strategy: <http://www.forestry.gov.uk/website/forestry.nsf/byunique/inf-d-6mgfky>



Consultation Response

- That they retain and improve the environmental effectiveness of existing regulatory mechanisms and procedures. These must ensure sustainable forestry, including Environmental Impact Assessment (EIA), Strategic Environmental Assessment (SEA), Appropriate Assessment, the UK Forestry Standard, and prior public consultation of planting proposals on FC's Public Registers for EIA and grant proposals. There may be scope to make the EIA process work better – including better FCS advice and guidance of how to carry out EIAs and what needs to be in an Environmental Statement relating to forestry. LINK would support an independent survey into the effectiveness of current scoping and EIA procedures. This needs to cover all woodland types, sizes, locations and contexts. It should include woodland: on farms; in urban areas; for water and flood management and climate change mitigation; under local planning and direct Scottish Government development consent; under SEPA control; and woodland covered by all SEARS bodies and under RPAC decision making; as well as for 'traditional' forestry objectives and native woodland establishment. This should include the effectiveness of monitoring carried out after implementation of agreed forest plans, to assess land managers compliance with these plans and the UK Forestry Standard. The full findings must be made public.
- The improvement of the effectiveness and operation of the Forestry Commission Scotland's all Scotland 'Regional Advisory Committee' (RAC) so that it ensures the protection and enhancement of public benefits, including biodiversity. LINK believes it should be taking an interest in environmental compliance issues under its statutory and non-statutory roles defined under the Forestry Act 1967. It needs to meet and be effective to ensure: the protection and enhancement of biodiversity; sustainable forest management is taking place; and that climate change mitigation and adaptation actions are done sustainably. The RAC should not be abolished, but made a more effective voice with mechanisms available to ensure sustainability.

Other opportunities

LINK welcomes the work being carried out in the Scottish Native Woodland Survey. We would like to see the data used, along with other modelling projects, to identify opportunities and priorities to target action to improve native woodland coverage and biodiversity condition. This will help to meet UKBAP and SBS targets.

LINK would also like to see better management of existing woodland. As mentioned earlier in this response, prioritising PAWS restoration would have the advantage of reducing pressure for new land to plant, whilst at the same time restoring historic native woodland sites, improving biodiversity, and helping to meet the SFS's commitment to native woodland species. Improved funding for woodland management is also likely to have a knock on economic benefit in terms of smaller scale forestry contractors.

Community woodland ownership has the potential to play a greater role in Scotland's woodland expansion and existing woodland management. Scotland has a low level of community ownership compared to other parts of Europe¹⁵. Community management of woods helps to connect local people to the management of the land they live in. This has the potential to generate local solutions to local land use conflicts. A recent parliamentary question answer¹⁶ suggest that the National Forest Land Scheme has had some level of

¹⁵ Woodland Trust. (2011) *State of the UK Forest Report*. www.woodlandtrust.org.uk/publications

¹⁶ Scottish Parliament written question S4W-04476 and answer: <http://www.scottish.parliament.uk/parliamentarybusiness/28877.aspx?SearchType=Advance&ReferenceNumbers=S4W-04476&ResultsPerPage=10>

success in supporting community woodland but more focus in this area would be beneficial.

The definition of 'woodland expansion' should also be considered. Montane scrub/woodland is often not considered in 'woodland expansion', although as a priority habitat under UKBAP and Scottish Biodiversity Strategy, it should be. Montane scrub/woodland is a very rare and vulnerable habitat and should be clearly defined as a type of woodland. Similarly wood pasture opportunities should be considered further to maximise the benefits it and other scattered trees in the landscape provide¹⁷. There is also a need to consider different planting densities and grant definitions of 'achieving woodland condition', in order to allow lower density native woodlands to be planted and managed for priority wildlife habitats and species, like black grouse as well as montane scrub and woodland.

LINK members would be happy to meet with the Woodland Expansion Advisory Group, Forestry Commission Scotland and other stakeholders to discuss these issues in more detail.

END.

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

Archaeology Scotland
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National Trust for Scotland
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¹⁷ Douglass, J., Rothero, G. & Holden, E. (2010) *Managing trees in Scotland's open habitats for lichens, bryophytes and fungi*. Plantlife. www.plantlife.org.uk/publications