

Scottish Forestry Grants Scheme review: Consultation questions.

Use this document to provide your answers to the questions contained in the consultation document. Please use as much space as you require for your answer.

Once you have completed your response, send or email it to:

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Responses are invited by **27 June 2006** but you are encouraged to respond earlier if possible.



LINK

**Consultation of the proposed changes to
the Scottish Forestry Grants Scheme (SFGS), April 2006**

Response by Scottish Environment LINK, June 2006

Summary

Scottish Environment LINK welcomes the opportunity to comment on these proposals to revise the Scottish Forestry Grants Scheme (SFGS).

Scottish Environment LINK is an umbrella body for environmental NGOs.

In this case we are representing the views of:

- John Muir Trust
- Ramblers Association
- RSPB Scotland (Royal Society for the Protection of Birds)
- Reforesting Scotland
- Scottish Wildlife Trust
- Woodland Trust Scotland

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General Comments.

1. Despite the Minister's positive comments about the levels of funding available for forestry, we would like to register our concern over the apparent inadequate budget available to deliver the proposed Scottish Forestry Strategy and other associated Scottish Executive commitments such as targets within the Biodiversity Strategy.
2. It must be clearly demonstrated that public money is being used to pay for public benefits. This includes the targeted management of existing native woods and plantation forestry to produce genuine high quality biodiversity, by delivering the Scottish, UK, EU and international commitments for woodland priority species and habitats, and those non-woodland priority species and habitats targets impacted by forestry. SFGS should also reflect the emphasis within the RDR on quality of life. Enhancing enjoyment of the outdoors is an important factor in this.
3. It must be made absolutely explicit that the UK Forestry Standard must be applied to all Tier 2 & 3 funded woodland planting, restocking and management by all grants administered by Forestry Commission Scotland, and by all of the SEERAD family.
4. The 'Principles' of the new scheme (page 4) needs to include forestry's contribution to the delivery of the Scottish Biodiversity Strategy and the Scottish Executive's 2002 World Summit on Sustainable Development commitment to increasing UK Woodland Assurance Standard (UKWAS) forest certification. It should also include other key policies and strategies such as the implementation of the Land Reform Act, European Landscape Convention and the Water Framework Directive.

Q1. Do you agree with the principle that the creation of small woodlands should be supported in this way?

No, it is LINK's view that all tiers of Land Management Contracts should be subject to assessment and planning in relation to their environmental and landscape resources. We have concerns that there is the potential for inappropriate planting on, for example, archaeological sites or important open ground habitats.

However, we understand the need to reduce administration costs, and thus if this approach is going to be taken, it should be made absolutely explicit that any planting must meet the UK Forest Standard. We suggest that potential applicants are given simple guidance on what this means within the applicants pack. This could be in the form of a mini-handbook, covering a number of objectives (biodiversity, recreation, game cover etc) written in a language that is accessible to those who are new to woodland management.

We assume that natural regeneration would also be eligible for a grant under this scheme with, perhaps, a contribution to fencing costs paid in year 1 and the balance once established.

Given the potential risks of this approach, we would be strongly opposed to anything other than native woodland being treated in this way. We also seek reassurance that a reasonable sample of these applications will be checked in order to ensure that, on the whole, UK Forestry Standards are being met.

Q2. Is the system of support for these woodlands a good compromise between simplicity and the need to adjust rates to reflect different circumstances?

Yes.

Q3. Do these models and rates adequately reflect the range of situations likely to be encountered?

No. It is difficult to comment since it is not entirely clear how some of the woodland types are defined (in particular 'mixed woodland'). The proposed rates themselves seem realistic. However, it is the relative rates which are critical and this is what will dictate what many private owners will plant. For example the owner looking to establish some game cover would seem most likely to plant 'mixed woodland' rather than native woodland simply because the grant rate is more attractive. We feel therefore that the relative rates for native woodland should be increased over other woodland types to reflect the enhanced public benefit they can deliver.

It is important that FCS allow increased flexibility in how trees are established, both in methods and in final stocking density (for example in areas where open woodland is desirable, such as for montane scrub and wood pasture, a lower stocking density should be allowed.)

For fencing costs, there needs to be a mechanism whereby the actual length on the ground, not the length on the map can be claimed for. It also needs to be made clear that fencing, particularly deer fencing, should only be erected as a last resort where effective deer management is not an option.

Q4. Do you agree that Forest Plans are an important way of delivering sustainable forest management and that we should be encouraging owners to enter the scheme?

Yes. LINK has responded separately to the SRDP consultation to which this SFGS consultation is linked. In our response to the former consultation we stated that "...planned outcomes for all SRDP measures are vital. The best value for public money can only be achieved through incorporating appropriate levels of planning to deliver the desired outcomes. LINK supports plans for all tiers of Land Management Contracts..."

Whilst we welcome the proposed support for forest plans, we consider these should also be seen as integrated with whole farm planning. There is little evidence for this cross-sectoral integration in this review.

Q5. Do you have any views on the appropriate level of detail that should be included in a Forest Plan?

Yes. There is a danger that if the requirement is very prescriptive over the format and content of the plan, it will not be appropriate for all circumstances: perhaps over complex and burdensome for the small, simple sites and not sufficient to address large and complex sites. We strongly feel that the guidance in Section 2 of the recently revised UK Woodland Assurance Standard (UKWAS) should be used. This guidance has been developed and agreed over a number of years by a range of stakeholders, allows for very simple plans for simple sites and may encourage more owners to become certified (which is a Scottish Executive commitment).

Forestry Commission Scotland forest planning guidance must be consistent across state and private sectors. *Forestry Practice Guide 12*¹ requires revision, to meet new SFGS Forest Plan needs, but also to connect with the revision of state forest guidance *FMM30*², which is also currently under review and the Land Reform Act and changes in access arrangements. New 'SFGS' funded Forest Plans need to assist to owners to becoming UKWAS certified. It would make sense for FCS as an UKWAS certified woodland manager, as well as non-state forest grant provider, to apply and give consistent forest planning advice. This will also need to connect with the revised UK forestry guidelines.

Q6. Do these rates adequately reflect the costs of preparing a strategic Forest Plan?

No. The minimum payment is too small. Small woods can be equally as complex as larger ones, sometimes more so. It is unlikely that any effective consultation with local communities can be undertaken with the budget given. The management planning process is a good opportunity to ensure that local people have a say in the management of their local woods, at this key stage. If the forest plan costs much more than the grant available for its preparation, many owners will be put off at this first hurdle, particularly if it may be obligatory to prepare a forest plan to get a WIG.

Q7. Do you agree with the introduction of Forest Environment Payments and do you have any comments on the activities to be supported by the proposed FEP?

Yes. FEPs must be for targeted work for 'non-woodland' as well as 'woodland' priority species and habitats within forest areas. Appropriate grazing systems should be recognised as eligible for FEPs

Forest Environment Payments must target 'High Nature Value Forestry Systems', which should be defined as:

- 1) Features and areas of significance for biodiversity:
 - a) priority species & habitats: EC Habitats Directive Annex 1 species and habitats, UK Biodiversity Plan priority species & habitats, Scottish Biodiversity List;
 - b) designated areas covered by Natura 2000 Payments: Special Areas for Conservation, Special Protection Areas;
 - c) other designated areas: Ramsar Sites, National Nature Reserves, Sites of Special Scientific Interest;
 - d) all ancient woodland on the inventory of ancient woodland, and other known sites which meet the same criteria, including ancient semi-natural woodland, other semi-natural woodland, plantations on ancient woodland sites, semi-natural features in plantations on ancient woodland sites

¹ Forestry Authority (1998) Forest Design Planning – a guide to good practice. *Forestry Practice Guide 12*. Forestry Commission, Edinburgh.

² Forestry Commission (undated) *FMM 3- - Forest Design Planning*. Forestry Commission, Edinburgh.

- 2) Forest systems and operations that are used to protect and enhance these features and areas.

Such a definition of 'High Nature Value Forestry Systems' should be used as eligibility criteria to target Forest Environment Payments to achieve clear biodiversity priorities.

For recreation payments, sites should be targeted where access improvements contribute to access strategies, core path and local path networks.

Q8. Do you support the principle of a restructuring WIG and do you have any comments on the proposed rates?

Yes. Acceptable reasons for not restocking PAWS or HAP priority woodlands with native species should be defined and should be restricted to circumstances where natural regeneration is being used as part of a continuous cover system where an element of non native species is inevitable. There should be an enhanced rate for restocking native species on such sites in recognition of the enhanced public benefit and possible opportunity costs of the owner.

Where site preparation is required to encourage natural regeneration on some restock sites, 50% of grant should be paid once work completed and 50% on satisfactory establishment.

The precautionary principle should be applied to 'genetically improved' planting stock with these being restricted to genetic improvements through breeding rather than genetic modification.

Q9. Do you have any comments on the list of proposed WIGs?

Yes. We have made some specific comments below. In general some flexibility should be allowed to standard operations if alternatives are cost effective and meet objectives.

Improving Economic Performance

We are pleased to see the inclusion of 'independent certification'. However it only appears under economic performance whereas it is in fact cross cutting and should be included under all activities. We would also like to see specific reference to UKWAS.

The development of Non Timber Forest Products should be seen as contributing to the range of public benefits from woodland and support for their sustainable use should be encouraged through tier 2 payments for training and tier 3 payments for diversification, skills development and organic forestry. This is a cross cutting theme which could also be included under 'access, recreation and community relations'

Improving Biodiversity

We would like to see the following added:

- 'Small scale felling and thinning' and 'pre-commercial and uneconomic tree removal' included under this section (essential for native woodland restoration).
- Ancient tree protection and management.
- Priority open ground habitat restoration and management.
- UKBAP priority habitats and species WIG (transplanting SFGS S4 in full).
- Capercaillie WIG - targeted at key capercaillie areas via the BAP Group,
- Black grouse WIG – using targeting from SFGS Guidance Note 30.

Improving Recreation, Access and Community Relations

Despite the latter part of the title there are no activities relating to community participation. We would recommend a discretionary payment (perhaps capped and based on a percentage of costs) for education, participation and interpretation costs. It is essential that there are incentives for landowners to talk with and negotiate with local communities, to involve them in planning and implementation if appropriate.

Recreation and access facilities should be promoted at a local level and information on where funds have been allocated should be made readily available to the public.

Drainage for paths should be included as an operation.

Management Planning and Monitoring

The proposed list seems rather prescriptive and again, despite the title of the section, does not seem to include any monitoring. However, if a defined list is required, we would like to see the following added:

- Ancient Woodland (including PAWS) management plan
- People involvement plan (this might include community engagement or audience development which goes beyond just recreation)

Q10. Do you agree with the principle that Forest Plans should become a prerequisite for access to WIGs in the future?

Yes.

Q11. Do you have any views on the general principle of integrating the forestry support measures into an umbrella support scheme delivered through the LMC system?

We strongly support the principle of integrating land management grants leading to a more holistic view of land management. However, we would be concerned to see any lowering of current standards. It must be made absolutely explicit that all forestry grants issued by FCS and/or SEERAD must meet the UK Forestry Standard as a minimum. At present this does not appear to be the case. It is essential that there is a consistency of environmental standards and targeting across all Tier 2 and 3 woodland creation, improvement and management grants.

Q12. Do you agree that top up mechanisms should be used to deliver extra support for particular activities?

Yes, where there is demonstrable public benefit and where they do not appear to be being delivered through 'standard' rates.

Q13. Do you have views on which woodland types and/or geographical locations should be the highest priorities for extra support through top up mechanism?

Yes, where there are well recognised additional costs and/or where SFS priorities are clearly not being delivered. We would support the proposal in the consultation.

We would like to see the following added:

- Ancient Woodland management and buffering (including PAWS restoration).
- Restructuring of plantation forestry for priority biodiversity, such as black grouse and capercaillie;
- Restoration of important open ground habitats, such as active blanket bog, by forestry removal – this must include all the impacted area, not just 20% of it;
- Native woods to meet UK Biodiversity Action Plan native woodland Habitat Action Plan targets.
- Montane woodland which requires urgent action as there are very few examples now within Scotland.
- Woodland access improvements which enhances the quality of core and local path networks.

Q14. Do you have views on this or other mechanisms for supporting community groups?

We would support the proposal for a fund for this purpose although question the need for it to be a challenge fund. It could be capped, perhaps paying a fixed percentage of actual cost, rather than forcing community groups to go through the lengthy, frustrating process of applying for a challenge

fund. We also feel that any such fund should be open to owners, as well as community groups, who wish to engage with local communities.

Where FE budgets do not stretch to carrying out feasibility or participatory appraisal studies to establish partnership working, there may be justification for constituted community groups to receive some element of this challenge fund where they are working in partnership with FE. It may help them feel as though they have the same opportunities to funding as independent community woodland groups and extend their options for engagement in the woods.

The grant support should be open to communities entering the National Forest Land Scheme, or those working on woodland crofts or affordable housing projects in/associated with woodland.