

## Refining the Scottish Forestry Grants Scheme Response Form – Summary of Questions

Please express your views below.

Please send your response to Liz Kirk, SFGS Review, Forestry Commission Scotland, Silvan House, 231 Corstorphine Road, Edinburgh, EH12 7AT, or (preferably) e-mail [liz.kirk@forestry.gsi.gov.uk](mailto:liz.kirk@forestry.gsi.gov.uk).

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Type of Respondent (please tick one box)

Woodland Owner

Forestry Company

Local Authority

Government Organisation

Other Organisation

Other: please specify

SEL is an umbrella body for environmental NGOs. In this case we are representing the views of:

- Council for Scottish Archaeology
- Highland Birchwoods
- Plantlife Scotland
- Royal Society for the Protection of Birds
- Scottish Native Woods
- Woodland Trust Scotland

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Please tick this box if you wish your response to remain confidential

## Expansion Grants

### P1. To establish well-designed productive woodlands

**Q1.1** Do you agree with these **Eligibility Criteria?** *yes/no*  
*If you have answered no, please tell us why.*

- No**
- To protect public investment there should be evidence of long term planning with a prediction of harvesting date and yield class. This should be a contractual agreement.
  - Areas unlikely to produce an economic crop in the future should be excluded
  - Areas restocked or planted with public funds in the past should only be restocked for commercial crop if the site has demonstrated an ability to produce productive timber. Otherwise sites should be restocked with trees for other objectives.
  - Archaeological and ecological surveys should be funded and a pre-requisite for significant change in land use

**Q1.2** The **Standard Costs and Specifications** for this grant option are set out on pages 16 and 17 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs?  
*yes/no*  
*If you have answered no, please explain why*

- No**
- Deer Fence specification – Activity No.60 – needs to be modified to include marking for black grouse as well as for capercaillie.

### P2. To expand the area of native woodland

**Q2.1** Do you agree with these **Eligibility Criteria?** *yes/no*  
*If you have answered no, please tell us why.*

- **No.**
- In order to protect and expand the valuable existing native woodland remnants in Scotland, the rule with regard to the size of new woodland in relation to source woodland should be less restrictive. This mitigates against large new native woodland schemes.
- The majority of ASNW is very small & isolated. These need to be buffered & expanded as a priority & thus, at the very least, area restrictions in such circumstances need to be lifted.
- The '300m rule' has no basis in science in terms of spread of species and the justification for this criterion on biodiversity grounds should be dropped. A more strategic approach, designating preferred areas for establishing native woodland would be preferable.
- Whilst we welcome the emphasis on the creation of FHNs, we are not clear why this should only

	<p>apply to native woodland and not productive woodland. We would expect FHNs to link a mosaic of woodland and non-woodland habitats and 'productive' forests.</p> <ul style="list-style-type: none"> <li>• Archaeological and ecological surveys should be funded and a pre-requisite for significant change in land use</li> <li>• 'Purpose' and 'Eligibility criteria' to include delivery for UKBAPs</li> </ul>
<p><b>Q2.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 18 and 19 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? <i>yes/no</i> <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There should be a specification and cost for removal of tubes from site &amp; proper disposal/recycling.</li> <li>• There should be more alternative types of fencing/stock control including dyke repair and electric fencing</li> <li>• There should be alternatives to chemicals for vegetation control and management</li> <li>• Under 'design' the removal of invasive non native trees and shrubs is specified, but there is no eligible cost for such an operation.</li> <li>• Deer Fence specification – Activity No.60 – needs to be modified to include marking for black grouse as well as for capercaillie.</li> </ul>
<p><b>P3. To improve riparian habitat</b></p>	
<p><b>Q3.1 Do you agree with these Eligibility Criteria?</b> <i>yes/no</i> <i>If you have answered no, please tell us why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• New planting should contribute to UK Woodland HAPs</li> <li>• It should be allowable to aggregate smaller areas to encourage mosaics of habitats including open space, in the riparian zone.</li> <li>• There should be more explicit flexibility with the 25m width rule to allow for inclusion of steep sided burns. An average width would be preferable</li> <li>• The expansion of riparian habitats should not have an adverse impact on significant historic landscapes.</li> </ul>
<p><b>Q3.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 19, 20 and 21 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? <i>yes/no</i> <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• As 2.2</li> </ul>
<p><b>P4. To improve the quality and setting of urban or post-industrial areas</b></p>	
<p><b>Q4.1 Do you agree with these Eligibility Criteria?</b> <i>yes/no</i> <i>If you have answered no, please tell us why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• Some 'post industrial areas' may not be within 1km of 3000 people eg East Ayrshire coalfields</li> <li>• There should be specific recognition that some post-industrial sites are recognised as being of national or international historical importance.</li> </ul>

<p><b>Q4.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 21, 22 and 23 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs?  <i>yes/no</i>  <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There is no recognition of extra costs in the urban environment, particularly establishment phase</li> <li>• There should be a greater allowance for open space &amp; more flexibility with stocking rates.</li> <li>• There should be greater flexibility with species choice to meet difficult site conditions and/or community aspirations</li> </ul>
<p><b>P5. To improve the diversity of the farmed/crofting landscape</b></p>	
<p><b>Q5.1 Do you agree with these Eligibility Criteria?</b> <i>yes/no</i>  <i>If you have answered no, please tell us why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There should be a higher rate for planting native species than non-native species. We would suggest 90% for native species with 60% for others</li> <li>• ‘Purpose’ and ‘Eligibility criteria’ to include delivery for UKBAPs</li> <li>• There should be a specific requirement to relate planting design to any existing historic landscapes</li> </ul>
<p><b>Q5.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 23, 24 and 25 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs?  <i>yes/no</i>  <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• As 2.2</li> </ul>
<p><b>Restocking Grant</b></p>	
<p><b>Q6.1</b> Bearing in mind your comments on P1 – P5 above, do you wish to make any different comments about the R1 – R5 <b>Eligibility Criteria?</b>  <i>Yes/no</i>  <i>If you have answered yes, please comment here.</i></p>	<ul style="list-style-type: none"> <li>• <b>Yes</b></li> <li>• There should be no grants for restocking of PAWS with predominantly non-native species.</li> <li>• There should be no grants for restocking of important open-ground habitats, such as blanket bog.</li> </ul>
<p><b>Q6.2 The Standard Costs and Specifications</b> for restocking are set out on pages 26 - 34 of the SFGS Standard Costs and Specifications Booklet and are mostly pitched at 75% of the new planting Standard Costs. Do you agree with these restocking Standard Costs? <i>yes/no</i>  <i>If you have answered no please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There is some justification for restocking grants to be at 75% of planting grants where a commercial crop has been harvested and the plantation is to be placed in another commercial rotation. If owners wish to change the nature of the forestry after harvesting, and restock with woodland for greater public benefits, the 75% rule acts as a disincentive.</li> <li>• There should be cost for chipping and/or mulching of brash for urban forests</li> <li>• There is no recognition of extra costs in urban environment, particularly establishment phase</li> <li>• Comments under new planting also apply to restocking.</li> </ul>

<b>Stewardship Grants</b>	
<b>S1. Improving timber quality</b>	
<b>Q7.1</b> Do you agree with these <b>Eligibility Criteria?</b> <i>yes/no</i> <i>If you have answered no, please tell us why.</i>	<b>Yes</b>
<b>Q7.2</b> The <b>Standard Costs and Specifications</b> for this grant option are set out on page 3 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? <i>yes/no</i> <i>If you have answered no, please explain why.</i>	<b>Yes</b>
<b>S2. Reducing deer numbers</b>	
<b>Q8.1</b> Do you agree with these <b>Eligibility Criteria?</b> <i>yes/no</i> <i>If you have answered no, please tell us why.</i>	<b>No</b> <ul style="list-style-type: none"> <li>• Too narrowly focused on area of woodland and should include 'OL' areas within SFGS</li> <li>• The small grant on offer is unlikely to encourage owners who are not already managing deer to do so.</li> <li>• 'Grant rates' need 90% for work to UKBAPs non-woodland and woodland SSSIs and Natura sites</li> </ul>
<b>S3. Native Woodlands</b>	
<b>Q9.1</b> Do you agree with these <b>Eligibility Criteria?</b> <i>yes/no</i> <i>If you have answered no, please tell us why.</i>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• <u>All</u> ASNWs, PAWS restoration and LEPs on the Ancient Woodland Inventory should be eligible for 90% grants</li> <li>• 'Grant rates' need 90% for work to UKBAPs and non-woodland and woodland SSSIs and Natura sites</li> </ul>
<b>Q9.2</b> The <b>Standard Costs and Specifications</b> for this grant option are set out on page 3, 4, 5 and 6 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? <i>yes/no</i> <i>If you have answered no, please explain why.</i>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There are no standard costs for Giant Hogweed or Japanese Knotweed control. These require own costs but we would also suggest an additional catch all under 'other invasives'. This would include non native tree regeneration</li> <li>• There should be a cost for removal and disposal of tree shelters.</li> <li>• There needs to be clarification of deadwood management. Is this a compensation payment for having and implementing a deadwood policy or are specific actions required?</li> <li>• There should be labour rates for stewardship grants in addition to recreation</li> </ul>
<b>4. Improving woodland biodiversity</b>	
<b>Q10.1</b> Do you agree with these <b>Eligibility Criteria?</b> <i>yes/no</i> <i>If you have answered no, please tell</i>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There should be more flexibility in the definition of open space being 'surrounded by woodland'. This</li> </ul>

*us why.*

may discourage some owners from fully restoring important open ground habitats that happen to cross the forest boundaries

- 'Grant rates' need 90% for work to UKBAPs and non-woodland and woodland SSSIs and Natura sites
- Need more clarity on what is to be done for biological monitoring and compilation on 5 year report to measure biodiversity delivery. This could come as part of changes to SFGS to facilitate UK Woodland Assurance Standard certification.

<p><b>Q10.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 6, 7 and 8 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? yes/no <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There should be 90% grant for operations that contribute to delivery of woodland and non-woodland UK BAPs.</li> <li>• There are no standard costs for Giant Hogweed or Japanese Knotweed control. These require own costs but we would also suggest an additional catch all under 'other invasives'. This would include non native tree regeneration</li> <li>• There should be a cost for removal and disposal of tree shelters.</li> <li>• There needs to be clarification of deadwood management. Is this a compensation payment for having and implementing a deadwood policy or are specific actions required?</li> <li>• There should be labour rates for stewardship grants in addition to recreation</li> </ul>
<p><b>S5. Landscape improvement</b></p>	
<p><b>Q11.1</b> Do you agree with these <b>Eligibility Criteria?</b> yes/no <i>If you have answered no, please tell us why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• Should specifically include urban landscapes.</li> <li>• Should include internal landscaping where there is public access.</li> <li>• Should only contribute to remedial action on forests that do not reach current standards where such forests are not already grant aided. Where they are already grant aided they should meet UK Forestry Standard as a matter of course.</li> <li>• Should include protection or enhancement of significant historic landscapes</li> </ul>
<p><b>Q11.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 9, 9and 10 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? yes/no <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There is no provision for assistance to remove uneconomic conifers &gt; 6 metres. This is acting as disincentive and preventing restructuring of conifer plantations in areas where costs are prohibitive, or where there is a net cost to owners.</li> <li>• As for 2.2</li> </ul>
<p><b>S6. Developing alternative systems to clear-felling</b></p>	
<p><b>Q12.1</b> Do you agree with these <b>Eligibility Criteria?</b> yes/no <i>If you have answered no, please tell us why.</i></p>	<p><b>No</b></p> <ul style="list-style-type: none"> <li>• Criteria must include protection/enhancement for UKBAP priority woodland and non-woodland species and habitats.</li> <li>• 'Grant rates' need 90% for work to UKBAPs and non-woodland and woodland SSSIs and Natura sites</li> </ul>
<p><b>Q12.2 The Standard Costs and specifications</b> for this grant option are set out on pages 10, 11 and 12 of the SFGS Standard Costs and</p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There should be more non chemical alternatives</li> </ul>

<p>Specifications Booklet. Do you agree with all of these Standard Costs? yes/no <i>If you have answered no, please explain why.</i></p>	
<p><b>S7. Woodland recreation</b></p>	
<p><b>Q13.1</b> Do you agree with these <b>Eligibility Criteria?</b> yes/no <i>If you have answered no, please tell us why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• FC Recreation Guidelines need reviewing and updating with particular reference to current legislation (Land Reform Act, Disability Discrimination Act) and current best practice such as minimising barriers to access.</li> <li>• Signage. Should specify ‘Walkers Welcome <u>or agreed equivalent</u>’. This will help to avoid a confusing array of different signs at some entrances.</li> <li>• Eligible operations should include public participation/education events and interpretation. This would encourage community participation and education in forest &amp; woodlands where legal ownership by ‘the community’ is not desired and/or an option.</li> <li>• Criteria must include protection/enhancement for UKBAP priority woodland and non-woodland species and habitats.</li> </ul>

<p><b>Q13.2 The Standard Costs and Specifications</b> for this grant option are set out on pages 13, 14 and 15 of the SFGS Standard Costs and Specifications Booklet. Do you agree with all of these Standard Costs? yes/no  <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• The principles of minimising barriers to access should be stressed more (&amp; Woodland Officers trained in such principles)</li> <li>• There needs to be a specification for general maintenance of paths and access structures including cutting back branches, inspection/minor repairs of gates and stiles etc.</li> <li>• There is no need for different specifications for different kinds of tree safety work. The implication is that an amendment would be required each time a tree blows down. We would suggest a cost based on estimated man days/year.</li> <li>• There are a number of important access and associated structures with no specification eg; installation of steps, bench (without picnic table), P&amp;R fencing, improving path drainage, horse gates, motorbike barriers, tapping rails, hand rails</li> <li>• Rate for litter should be based on area and location of site.</li> <li>• There should be more flexibility on number of cuts for path strimming with a rate/cut rather than only allowing 3x/year.</li> </ul>
<p><b>S8. Developing community involvement</b></p>	
<p><b>Q14.1</b> Do you agree with these <b>Eligibility Criteria?</b> yes/no  <i>If you have answered no, please tell us why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• Community management/involvement on FCS land should be included</li> </ul>

<b>Farmland Premium</b>	
<p><b>Q15.1</b> Do you agree with these limits? yes/no <i>If you have answered no, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>No</b></li> <li>• There needs to be a redefinition of a ‘farm business’. Many farming businesses now manage a large number of holdings and thus could be dissuaded from planting woodland on a property because their allowance had been used up elsewhere. We would suggest that the limit is applied per land holding.</li> </ul>
<p><b>Q15.2</b> Would you accept lower payment levels in return for higher area limits? yes/no <i>If you have answered yes, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• A sliding scale, with lower payments/ha for larger schemes would be appropriate.</li> </ul>
<b>Grant Rates</b>	
<p><b>Q16</b> Do you agree with these grant rate apportionments? yes/no <i>If you have answered no, please explain why.</i></p>	<p><b>Yes</b> as a general principle, however we do question how this principle has been applied in certain cases. We have highlighted these cases in previous comments</p>
<b>Application Process</b>	
<p><b>Q17</b> Do you have any comments about the SFGS application process? <i>If you have answered yes, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• <b>Yes</b></li> <li>• There is a lack of consistency between conservancies and sometimes within a conservancy in how rules are applied. Whilst we are pleased to see flexibility that recognises local and site specific circumstances, the balance between this flexibility and certainty of process has not been achieved.</li> <li>• The grant calculator requires further work to allow, for example, inserting of rows, copying and pasting.</li> <li>• Whilst accepting that this is a new scheme that we still all have to get used to, there is no doubt that is far more complex than the old scheme. This must be a disincentive for some owners, particularly the smaller woodland owners.</li> </ul>
<b>Locational Premiums</b>	
<p><b>Q18</b> Do you have any specific comments about existing Locational Premiums, such as eligibility criteria or rates per hectare? <i>If you have answered yes, please explain why.</i></p>	<ul style="list-style-type: none"> <li>• Current locational premiums should remain</li> <li>• We suggest an additional locational premium to include <u>all</u> urban areas in Scotland</li> <li>• We are concerned about the varying quality of the woodland strategies that the Locational Premiums fund. FCS and Scottish Executive must work up replacement Indicative Forestry Strategy guidance as a matter of high priority. The Western Isles woodland strategy does not properly consider designated nature conservation sites or protected habitats or species – it would be unfortunate if FCS funded this in its current format with an</li> </ul>



**Further Comments**

**Q19** Do you have any further comments on the Scottish Forestry Grants Scheme? yes/no  
*If you have answered yes, please put your comments here.*

**Yes**

- Standard costs are generally too low for fragile, remote and urban areas. There needs to be a mechanism for allowing standard costs to be varied in such situations to enable a wider range of forestry operations to be undertaken.
- Applicants should be obliged to justify expenditure of public money in terms of public benefit.
- There is more development work needed to produce further targeted specifications and standard costs for black grouse in time for the next SFGS review.