UKFS: a call to enhance the 'People' theme

This call to enhance the People theme of the UK Forestry Standard has been developed via a series of workshops and conversations between a range of organisations and individuals with environmental and social interests in forestry in Scotland. The signatories to this document who support this call are listed in section 9 of this document.

1   PURPOSE OF THIS PAPER

We have collectively written this paper because we want the UKFS to provide a *stronger basis* for *clearer* public and community engagement than it presently does. We agree with industry stakeholders that we don't want to make this process more onerous, and that it should be simple, efficient, and guard against any unreasonable blocks on forestry.

To achieve that, it also needs to be transparent, easy to understand, and meaningful. It should be clear enough to ensure compliance and avoid waste of resources on conflict and anxiety. That is not currently the case.

This paper outlines the current difficulties, and proposes simple changes that would enhance the credibility, sustainability and functionality of the next UKFS.

2   KEY MESSAGES

1. **Changing context.** The forestry and land use context has changed, leading to significant tensions around the distribution of benefits from land ownership and land use change. The revised UKFS needs to address and reduce these tensions.
1.1 The majority of tensions are around new commercial planting. The revised UKFS must give more explicit attention to standards for new planting.
1.2 The UKFS must require forest management and new planting to acknowledge and ameliorate cumulative impact of multiple forestry schemes.

2. **Engagement and consultation** The UKFS must provide a stronger basis for clearer public and community engagement than it presently does. It needs to be transparent, easy to understand, and meaningful. It should be clear enough to ensure compliance and avoid waste of resources on conflict and anxiety.

2.1 The definition of 'People' must be clarified and expanded to include (and distinguish between) communities of place, communities of interest, public, stakeholders, and experts, and how to identify people with a 'recognisable interest'.

2.2 The UKFS needs to make appropriate consultation a requirement, with clear indicators of compliance.

2.3 Full consultation may only be required for sensitive applications. The UKFS must indicate how to identify sensitive cases in order to avoid an undue burden on the simpler and small scale cases. Sensitive cases are characterised by factors including: scale, proposed species composition, proximity to communities, level of existing use, environmental designations, impact on sense of place (such as landscape setting, locally meaningful places and views), cumulative impact of multiple schemes and management plans.

2.4 Woodland creation proposals assessed as sensitive should be required to go through a public consultation process, with:
- early heads-up e.g. to community councils at design stage;
- publication of site maps and environmental and other surveys (with appropriate redactions if sensitive species involved) on public register.

2.5 For those not assessed as sensitive, consultation should still be more pro-active and include:
- alert neighbours, and relevant community bodies, to existence of application on register;
- provide maps on the register;
- proactively seek knowledgeable local stakeholders and invite input.

3. **Local economy.** The UKFS should more proactively encourage support for rural development. Larger or sensitive schemes should be required to demonstrate how they contribute to local woodland- based enterprises and economic activities.

4. **Access and recreation.** Access must be recognised as relevant to all forest management and creation.

4.1 An **access management plan** should become a requirement for all large or sensitive woodland creation proposals, and for forest management plans. This must be based on relevant consultation as agents cannot know local usage and recreational requirements.

4.2 Existing patterns of access and opportunities for greater public use of the forest should be mapped at the planning stage, by involving the local community and communities of interest.

4.3 For harvesting and replanting operations, a new access management plan should be required.

5. **Local knowledge as an asset.** The revised UKFS must acknowledge and provide routes to inclusion of local knowledge in forest management and planting plans.

5.1 It should recognise the need for stakeholder engagement to fulfil biodiversity criteria, including local recorders. It can do this by requiring new planting and FMPs to:
- access and use data held at Local Record Centres;
- invite local wildlife groups to respond with data;
- make all relevant data publicly available so that local communities and stakeholders can make informed responses.

5.2 Similarly the revised UKFS must require that forest management 'take account of the historical character and cultural values of the landscape' by seeking and incorporating the knowledge and values of relevant communities of interest and place.

6. **Guidance for implementation and monitoring.** UKFS must be supported with clear guidance for regulators and help to improve compliance

3 WHY THE NEED FOR THIS PAPER?

3.1 Purpose of UKFS

The UKFS is intended to provide a basis for regulation and monitoring, and to set guidelines for sustainable forest management, which is recognised as having environmental, economic and social components.

A standard would usually be expected to give clear indicators of compliance, but much of UKFS 2017 is not worded in this way. Instead, particularly in the 'People' section, many points are couched as "things to consider". This may be appropriate for some points, such as opportunities for volunteering. But many points should not be optional, especially for larger or sensitive applications. For example, ' involving people in the development of forestry proposals' and 'producing an access management plan' cannot simply be 'considered' especially as such 'consideration' often results in no action. Re-phrasing of guidance would reduce conflict by reducing ambiguity and clarifying expectations for all parties, including regulators, land managers, agents, local communities and the public.

The UKFS defines sustainability in the UK context. Forestry is not sustainable where it is to the detriment of society's and / or local communities' values, well-being and livelihoods, and / or where it provokes conflict. Some aspects of the UKFS need to be tighter in order to help avoid these undesirable impacts.

Tighter criteria (such as community consultation) are currently set by individual grants schemes. But the overarching standard should already define those. To ensure good practice is part of the culture, practice and outcomes of forestry management across the UK, the benchmark for sustainability cannot be devolved to specific circumstances but must be applied universally.

3.2   People as an asset

The UKFS acknowledges the importance of the role of people in delivering good forestry practice. UKFS 2017 describes both the significant social benefits of forestry and how an inclusive approach to community involvement 'will help ensure that the facilities, goods and services provided are suitable for the widest range of people.' The Standard references the Scottish Forest Strategy's focus on 'forestry for and with people' (from the 2006 strategy; the current strategy does not include this phrase).

While we support these principles, we also believe that they should be extended to acknowledge the value that people can contribute to delivering high quality outcomes from forestry and that this in turn should lead to clearer requirements in the UKFS on engaging with people.

Perhaps most obviously, people can bring local knowledge that is often not available to forestry companies or Scottish Forestry. They will often have a 'feel' for an area and its sense of place, its heritage, interest and relevance. Their involvement will ensure better ecosystem service provision, climate change and biodiversity outcomes. Finally, people can offer insights about economic opportunities, alternatives to conventional commercial forestry, and ways the land is being and can be used by people for recreation, wellbeing or education, which will help to achieve the spirit as well as the letter of the UKFS.

3.3   UKFS must reflect context of tensions over land ownership and rapid land use change

The UKFS must be framed within the contexts of the respective nations and acknowledge that there are significant tensions around the distribution of benefits from land ownership and land use change. The interpretation and implementation of UKFS must not be seen to hinder broader policy objectives.

The forestry and land use context has changed markedly in recent years, with all administrations identifying woodland creation as a key mechanism for tackling climate change. Woodland creation in Scotland is at its highest levels for 20 years, and is anticipated to rise in all nations to rates not seen since the 1980s.

The cumulative impact of afforestation proposals, with the promise of more to come, is a matter of considerable public concern and is contributing to serious polarisation in a sector that should be focusing on resilience and facing the future together.

Whilst a great many woodland creation schemes are small and uncontentious, over half the approved area in Scotland is accounted for by the 130 largest schemes: those over 100ha, which represent very significant land use change. Additionally, whilst nationally there is substantial uptake of a range of planting options, there are significant regional disparities. The 'Conifer (predominantly Sitka spruce)' option accounts for 80% of approved planting in the South Scotland conservancy (Appendix 1), contributing to concerns for balanced development in the region (Box 1).

The UKFS needs to recognise the potential for significant impact on 'People' of the current scale of change. Factors affecting impact include size and species composition, but also proximity to communities, effect on locally valued places and 'sense of place'. UKFS 2017 refers to the value of

local knowledge in the context of forest management but omits to mention its value in the context of new planting, for example.

The UKFS must expect forest management and new planting to acknowledge and work with these impacts where they occur. It must also therefore find better ways of identifying the sensitive cases in order to avoid an undue burden on the simpler and small scale cases.

Box 1. Extract from Southern Upland Partnership's position statement on forestry
There is currently a major and rapid shift in land use taking place across Southern Scotland. This is being driven by a combination of public grant, economics and assumed environmental benefits. We believe this change is not being as carefully considered as it should be. We risk losing a range of habitats, species and opportunities for a more diverse pattern of land use that might improve community and environmental resilience.
(SUP 2021)

3.4 UKFS must be supported with clear guidance for regulators and help to improve compliance

The UKFS applies to all forestry activity, whether or not it is the subject of an application for grant, plan approval or felling permission.

However, in practice, it is only when land owners make grant applications (or seek approval for non-grant aided planting projects), submit forest plans or apply for felling permissions/licences that an assessment against UKFS occurs: thus most of the issues around the implementation of UKFS arise in conjunction with such applications.

Responses to the first round of consultation highlighted difficulties with monitoring compliance. When SEPA conducted a study of UKFS compliance in south Scotland they found 26% of forestry sites were non-compliant, assessing only those criteria relevant to SEPA (drainage and pollution) (SEPA, 2020).

We recognise that regulators have an increasing workload, and are often under substantial political pressure to expedite applications. Our comments are therefore intended to strengthen the hand of regulators and ensure that both the letter and spirit of UKFS are met by forestry proposals. Additionally, providing clearer guidance on the interpretation of UKFS requirements should help landowners and forest managers to design and submit better proposals.

Better proposals with increased community support are in everyone's interest and will reduce time and workload for both land managers and regulators.

3.5 Need for improved clarity and terminology on 'Consultation'

We agree with Confor's statement:

- The UKFS should be the bedrock for consultation, with foresters and stakeholders agreeing to work to set time scales within the Standard.
- Consultation periods should be clear and respected by everyone involved with it. (Confor, 2021)

However, UKFS does not currently specify any consultation requirement, and is vague and muddled on the reasons for involvement of different groups including local communities, communities of interest, and local experts.

3.6 Need for improved clarity and terminology on 'People'

There is little recognition in UKFS 2017 that 'people' are more than local communities. 'People' include communities of place, communities of interest, stakeholders, and experts. But, for example, UKFS 2017 mentions the word 'stakeholders' only three times, none of them requiring mandatory action.

The characterisation of community benefits from woodlands in UKFS also needs some updating to address patronising language. For example, UKFS 2017 states 'In some parts of the UK there are successful examples where forest land has been made available for community leasing or outright ownership.' Even in 2017 when this was published, it was out-of-date. Community ownership is a result of community empowerment, not landowner or government largesse. Community ownership and management is a policy priority in all the nations of the UKFS.

3.7 Evidence base

The industry has stated, in its response to the first consultation round:

> Confor members believe, that in recent years, the amount of anecdotal evidence from stakeholders preventing forest operations has massively increased. Stakeholders have a right to be heard but should not be able to unduly, and without robust evidence, prevent or change forest operations that affect the viability of projects. (Confor, 2021)

Claims and counter-claims of 'anecdotal evidence' are unhelpful. Complaints of unreasonable delays need to be backed up, and reasons explored. Equally, it would be wrong to dismiss as 'anecdotal' real experiences of conflict, loss of valued local qualities of place, missed opportunities for local engagement and development, and unnecessary waste of community and public resources. A proper review of experiences is need, which takes into account sustainability in the round.

This paper draws on repeatedly observed patterns of experience, not on isolated anecdote. It also draws on a number of published reports which are listed in the References section below, and an on-going scoping study which is gathering accounts of community experiences of forestry proposals.

3.8   Scotland focus

We have written this paper specifically in response to experiences, concerns and tensions in Scotland. We believe that many of these issues apply across the UK, and highlight the need for the UKFS to address the context of increasing competition and tensions between land uses as the 'standard' of sustainable forestry applies across the UK.

The Scottish Forestry Grant Scheme (FGS) expects much more of new planting applications than the UKFS, in terms of consultation. Experience with that provides useful evidence of what the UKFS should be requiring, and of the need for better control of implementation.

Furthermore, the interpretation and implementation of UKFS must not be seen to hinder broader policy objectives. Implementation of UKFS 2017 conflicts with these broader objectives. For example in Scotland land managers are expected to operate in a social context which includes the Land Rights and Responsibilities Statement (currently being revised) and Scottish Government commitment to a just transition. The Just Transition Commission is concerned not only with mitigating injustices that arise because of climate change, but also with taking opportunities to address existing inequalities, using the transition to net-zero as a catalyst for building a fairer, healthier, greener country.

4 Involving local communities and stakeholders

4.1 Why 'People' are an issue

The UKFS 2017 states: 'The public is increasingly being encouraged to get involved in the decision-making processes of forest management and planning.' This is a weak statement, and ignores the enormous impact that forestry can have on communities, and the benefits of 'involvement'.

It further states (p.98): 'The social dimension of forest planning is also an important consideration from the outset. For woodland that will be regularly used for recreation or is prominent in the landscape, community involvement in the planning process will be a vital part of developing proposals (see Forests and People).'

But this 'vital part' is not translated into a requirement. A much more robust approach is needed, both to ensure that 'People' are properly included, and that forest managers have clarity, predictable timeframes and benefit from local knowledge and goodwill.

Foresters sometimes point out that farming land use does not require consultation. But lack of precedent elsewhere is not an excuse for poor practice in forestry. In comparison, the requirements for windfarm planning are significantly *more* rigorous and require full transparency and sharing of information.

4.2 Evidence of the issue

The SUP / BFT study concluded that across two community council areas of the Scottish Borders, communities had not been engaged constructively in new planting applications (Box 2).

Box 2. Extract from Section 4.2 of the SUP/BFT study:

Early and meaningful engagement is key to making the current system work to best effect for all stakeholders. The aim is to reduce stress, conflict, uncertainty and wasted time and money. Community members and community councillors described problems with understanding how the application process for a new forestry scheme works, and pointed out that 28 days to respond does not fit with the cycle of Community Council meetings. They felt that meaningful involvement would require facilitation and it is accepted that resources are needed to generate significant interaction.

While many local stakeholders feel side-lined in major land use change, most are not opposed to woodland creation in the broader sense. The study has identified local interest in creating woodland which is more diverse and suited to the landscape, rather than the current dominant model.

[the section also includes specific proposals to address the problem]

Even under the more exacting consultation requirements of the FGS, there are still many problems with implementation. Some patterns emerging in the forthcoming study of community experiences are summarised in Box 3.

A resident-led group in Galloway has formed 'Communities for Diverse Forestry' in response to many of these problems. Achievements include the development of guidance for community councils responding to new planting applications. This has all been done in voluntary time, and meets with mixed attitudes from forestry agents. The group is campaigning to get these guidelines – or equivalent – agreed and distributed as standard practice. The group highlighted that sufficient *participatory* engagement is often difficult to achieve, and a culture of defensiveness in the industry is often evident from the outset, which can get conversations off on the wrong foot.

The current climate is exacerbated by a 'top-down' attitude of entitlement common among landowners and forest agents from some of the larger companies. Local residents do not lack relevant knowledge, and their values are not irrelevant; what they lack is an understanding of the forestry application system. This is perpetuated when forest managers and woodland agents are reluctant to carry out meaningful participatory engagement.

Box 3. Community experiences of consultation in relation to new planting applications under the Scottish Forestry Grant Scheme

- Those involved are often engaging in voluntary time and fitting it round their own work commitments and/or caring duties at home. Rather than treating local people as a problem, forestry needs to value this input more.

- For community groups the process is often unclear.

- One month for the consultation process at Public Register stage is too short. People can be coming completely new to a site and to the ideas proposed, and one month does not fit with the cycle of Community Council meetings.

- In practice, less than one month is available, because for members of the public, the maps and documents are not made available online, and have to be requested by email from Scottish Forestry. This can take up to three working days, plus a further two days over a weekend, when every single day is precious. Occasionally, extra maps or surveys need to be requested from the Woodland Officer to shed light on a particular issue - requiring additional days.

- A joint site visit with members of a community at scoping stage is a helpful way of gathering information on the current sense of place, current uses, important heritage and cultural features and key visual associations (views). Omitting this causes delays and issues and a feeling that communities haven't been listened to. Many (not all) proposals are the work of distant designs made at desks by people who have little or no empathy with the location.

- Communities report experiences of forest agents withholding relevant information such as biodiversity surveys.

- Early, 'upstream' notification helps communities to engage with processes a lot. If all the information-seeking work is initiated at an earlier stage of the Consultation Process, then a Public Register deadline of one month for a final or near-final late iteration of the plan would be sufficient for any last points. If not, an 8-week deadline is more realistic.

Source: forthcoming study of community experiences of FGS consultation

4.3   Recommended changes

UKFS 2017 says (p. 136) 'Consideration should be given to involving people in the development of forestry proposals who have a recognisable interest in the proposal or its outcomes.' This is weak. If people have a 'recognisable interest' they *must* be involved. The UKFS needs to make consultation a *requirement,* with clear indicators of compliance. The UKFS should also do more to ensure that those with a 'recognisable interest' are properly and fairly identified and then engaged.

The UKFS needs to make a clearer distinction between consultation arrangements for planning or felling in most cases "business as usual") and woodland creation (which is land-use change).

Full consultation may only be required for sensitive applications. Criteria for what is sensitive need to be clear, and applied by the regulatory authorities, not simply 'considered' by the forest management interests. Scale, proximity to communities, level of existing use, environmental designations, species choice, landscape impact and cumulative impact of multiple schemes and management plans, all affect sensitivity.

Woodland creation proposals assessed as sensitive should be required to go through a public consultation process, with

- early heads-up e.g. to community councils at design stage;
- publication of site maps and environmental and other surveys (with appropriate redactions if sensitive species involved) on public register.

For those not assessed as sensitive, consultation should still be more pro-active and include:

- alert neighbours, and relevant community bodies, to existence of application on register;
- provide maps on the register;
- proactively seek knowledgeable local stakeholders and invite input.

Specific suggestions for rewording can be found in Appendix 2.

Additional guidance and support will be needed:

- for regulators, landowners/managers and public, on how "sensitive" will be assessed;
- for landowners/managers on how to engage with local communities and other people with 'recognisable interest'; including joint site visit at early stage;
- for potential consultees, to explain woodland creation approval and consultation processes.

5   Local knowledge, place and livelihoods

5.1   Why 'People' are part of this issue

This section focus on what local engagement can contribute to better (more sustainable) forestry. Our experience is that these fall into three categories: knowledge, sense of place, and livelihoods**.**

Local knowledge, local communities of interest and experts are often essential sources of information about biodiversity, heritage, history and culture. This contribution to knowledge is discussed in sections 6, 7 and 8 below.

UKFS 2017 recognises that 'Forests contribute to the local sense of place, and they can form part of the wider physical and cultural landscape.' (p. 129) and notes that 'Frequently, forests are a focus for cultural activities, traditional and new; these help to maintain and extend the role of a forest in contemporary culture and build a sense of community.' It's vital to establish local peoples' *existing* 'sense of place' at the earliest juncture of an application to ensure long-standing cultural associations and recreational uses are respected. Sense of place is an acknowledged component of well-being and must be taken into account when considering land-use change. This knowledge of place also means that local people sometimes have a more informed view on the cumulative impact of land use change. Yet these knowledge and values are rarely taken into account in new planting applications or forest management plans.

UKFS 2017 refers to rural development and the [potential] benefits of new forest-based businesses and community development. Forest and woodland-based enterprises of all types make an important contribution to the local economy. This can be particularly important in supporting rural livelihoods and providing new economic activity in regenerating urban areas. Yet this aspect is very rarely included in new planting applications, and rarely in forest management plans.

5.2   Evidence of the issue

Estimates suggest the total number of people connected with small-scale woodland-related activities could be about 6,255 people, and their income and local spend amount to an estimated £69.8 million per annum in Scotland (Watt and McGhee 2018). However this is much less than the potential and needs support to ensure the sector is encouraged with well designed and actively managed woodlands (Worrell et al. 2018). The SUP / BFT study found that 'Forestry represents a significant investment in rural areas, but little of the investment actually benefits local communities. Forestry developers could do more to help explore local opportunities.'

5.3   Recommended changes

In addition to the changes needed under other sections to increase recognition of the value of local knowledge, and the impact of land use change on local people, the UKFS should more proactively encourage support for rural development through stronger wording around local forest and woodland- based enterprises and economic activities should be explored.

6   Recreation and access

6.1   Why 'People' are part of this issue

The benefits to mental, physical and social well-being, of access to the outdoors - and woodland in particular - are well documented. The UKFS recognises this. However it implies that access is only important in particular kinds of woodland. On the contrary, access is an important consideration in *all* forestry. In Scotland, there are legal requirements for land managers to respect access rights, but in practice there are widespread failings in the way forests are created and managed with regard to access rights. Forestry has often formed a block on public access across huge swathes of Scottish hillsides and effectively cuts off the right to roam. We now have a situation where replanting of existing forests, along with accelerated planting of new forestry, has the potential to exacerbate this situation, unless there is a requirement to take public access into account in every forestry scheme.

This issue applies to local communities and to wider recreational users. Forested land is often important for local and daily exercise, and needs to be recognised as a subject for local consultation. Where properly accessible, forestry provides safe recreation opportunities, whereas farmland can be notoriously difficult to access. Access needs to be planned in from the start of new planting applications.

6.2   Evidence of the issue

There are clear benefits to local economies from recreational activities, with up to 18% of the economic value of forestry coming from recreation and tourism, supporting over 6,300 FTE jobs (CJC Consulting, 2015).

Yet the requirement for access is widely abused. Common issues documented by Ramblers Scotland

are listed in Box 4.

Examples of good practice:

- When Borders Forest Trust was proposing new planting at their Corehead site, they ran a consultation on access, with clear maps of proposed fences, styles and gates. Maps were annotated with explanation of thinking behind the location of access points.
- New path networks –good examples of new woodland planting have created extensive path networks using unplanted forest rides, then signposting these paths to help the public enjoy routes around and through the woodland. These are particularly important in areas close to centres of population where there is a high demand for access routes.

Problems with signage:

- Forestry & Land Scotland has generally shown high levels of good practice in its use of signage and other means of communications to alert the public when forestry operations are being carried out, such as informing representative bodies so that they can disseminate the information as well as on-the-site signage and web-based resources.
- However, contractors employed by FLS have not always been so efficient.
- Community owners and local private estates tend to be more responsive and are able to pick up on any issues due to being able to keep a closer eye on contractors.

Box 4. Issues which arise when public access isn't fully considered in forestry planning, creation or management
• Existing patterns of access are usually only considered if they form a core path or right of way. Well established routes may be ignored, especially if consultation is limited and doesn't fully engage local communities or recreation bodies. This has led to popular paths being planted over or being ploughed up during harvesting operations without being reinstated afterwards.
• Long stretches of deer fencing form a block on access across huge tracts of land, and are a safety concern for hillwalkers coming off the hill. Access points, such as stiles, can be few and far between away from paths. Yet (in Scotland) access rights apply across all land and managers should recognise that people may approach the forest away from paths. (This is specifically covered in the Scottish Outdoor Access Code (SOAC), para 4.9).
• Locked gates across vehicle tracks form a block on access for everyone. If there is a stile or a kissing gate next to the gate that is better than nothing, but these still affect those who are less able, dog walkers, cyclists and horseriders. If a gate needs to be locked for management reasons there should be a self-closing gate installed next to it. (See SOAC, para 4.9).
• Poor use of signage to manage access during forestry operations has led to a culture of mistrust in signs, which often means walkers and other recreation users ignore signs and this can put them at risk of injury.
Source: Ramblers Scotland

6.3   Recommended changes

An access management plan should become a requirement for all large or sensitive woodland creation proposals, and for forest management plans.

Access and recreation must be recognised as relevant to all forest management and creation. Guidance may be used to set a minimum area or proximity to community.

Forest agents cannot second-guess which areas and routes are most important to users, and consultation is necessary.

Forestry planning – existing patterns of access and opportunities for greater public use of the forest should be mapped at the forestry planning stage, by involving the local community and communities of interest in developing an access management plan for woodlands over a certain threshold area, or near a community.

For harvesting and replanting operations, a new access management plan should be required. For example, if fencing is to be used, the plan should outline where regular access points will be created, both on established routes and at other points in the fence to enable access to the land away from paths. Any gates or path infrastructure should be suitable for those walking, wheeling, cycling or on a horse, and where appropriate, land managers should work with local communities to support cultural or educational activities which may take place within the woodlands.

Better engagement with local communities and (in more popular areas) other stakeholders would lead to improved outcomes.

Additional guidance and support will be needed:

- Guidance for regulators, landowners/managers & public on how forestry expected to deliver responsibilities under part 1 of Land Reform (Scotland) Act 2003
- Support for landowners/managers to meet responsibilities
- Updated guidance for public on how to take access responsibly

7 Biodiversity

7.1 Why 'People' are part of this issue

Local people are sources of knowledge about biodiversity, and are also directly impacted by its loss.

Relevant species records are held by Local Record Centres, but these are not listed as data sources in UKFS 2017 (Box 5).

Box 5. Extract from The Southern Uplands Partnership position statement on trees, forests and woodland:
"Biodiversity knowledge is reliant on recorders, often 'local people', and for more specialist species groups, members of 'communities of interest'. We have previously suggested that a quick and cost-effective win would be to require all new planting proposals to be screened by Biological Record Centres to identify possible sites of ecological value. This would allow plans to be modified at an early stage and would reduce the chances of planting on valuable sites." (SUP 2021)

7.2 Evidence of the issue

Early evidence from the review of community experiences, indicates that a common problem is lack of transparency in data sharing. Community councils report that Phase 1 Habitat Surveys are not always shared to help them form their views about a Woodland Creation proposal. One example showed that a survey was withheld (against the advice of Scottish Forestry) on the basis that it was funded by private money and was therefore private information.

The SUP / BFT study particularly Table 8 provides detailed evidence on this issue. A quick win was identified as:

- Improve (free) availability of data to ensure the applicant doesn't have to fund new species or habitat surveys.

Local authorities contributing to this paper also pointed to the failure of new afforestation applications to take into account data held by Local Record Centres.

An example from the forthcoming study of community experience is given in Box 6. While this was provided as an example of good practice, it is remarkable that a red-listed plant was not otherwise known to the agent and highlights the need for proactive involvement of local expertise.

<div style="background-color:teal; color:white">

Box 6. An example of good experience of using local biodiversity expertise

</div>

A forest agent working for one of the major FM companies made early contact in 2019 with a range of organisations as non-statutory consultees, about a very large proposed planting scheme (over 100ha) in Stirling Council area. The Local Wildlife Group (LWG) was included on the advice of the Biodiversity Officer. The agent provided a location map and a proposed species map, but no other written information.

He requested information from the LWG about a very rare Red-Listed plant that the Biodiversity Officer had advised was on site. The LWG provided the information requested, and addition information on mammals and habitats, as well as contact details for more expert advice, and for the Local Records Centre. The agent shared subsequent versions of the proposed design for further comment. He took seriously the importance of:

- the presence of a very rare plant and the small burn it depended on; this led to the area being excluded from planting, and ensuring, via careful planning of the fence-line, the level of grazing the plant needed;
- priority habitats on the Scottish Biodiversity List, and the need for excluding these areas from planting plans;

- the need in certain places within the site with priority habitats adjacent for wider buffer zones than the minimum to prevent drying out of the ground by the fastest-growing conifers.

This approach worked well and was a big improvement on previous experiences. Importantly it meant that by the time the application reached the Public Register, the LWG only felt it necessary to make one final comment. The group felt it was significant that the agent did not regard UKFS minimum standard as what he was aiming for. Instead, he was aiming at doing a good job, and was open to hearing unexpected information and reconsidering the forest design in the light of that information. They were content with the outcome: about 35ha taken out of the planting area altogether, or re-assigned to native species.

The LWG were surprised by the lack of knowledge of the species and priority habitats, and where to find information about them. They also thought the agent was surprised about the amount of information they provided and the persistence with which we pursued issues that had not yet been addressed.

Although this was a significantly more constructive consultation than many, the LWG did not receive routine written feedback, nor final species map of the Approved Final Version of the proposal and felt this should have been provided by Scottish Forestry.

7.3   Recommended changes

UKFS 2017 provides a strong steer on biodiversity but much of this is open to interpretation and non-mandatory. In this paper we limit our recommendations to those involving 'People'.

The revised UKFS should recognise the need for stakeholder and community engagement to fulfil biodiversity criteria. This is an area which requires specialist knowledge for example in relation to designated categories of protection. However it is clear that much of this specialist knowledge is found within local and regional communities.

The revised UKFS must include the need to

- access and use data held at Local Record Centres;
- reduce costs to forest owners and agents by sharing data;
- make all relevant data publicly available so that local communities and stakeholders can make informed responses.

8 Heritage

8.1 Why 'People' are part of this issue

Local people are sources of knowledge about the historic environment and have an interest in conserving or enhancing cultural significance of heritage assets. Public engagement with community interest groups can and does yield useful information about the historic environment which will help to inform management, and opportunities for public benefit. These benefits may include:

- Improved access to or interpretation of heritage assets
- Community-led stewardship or maintenance of heritage assets
- Community-led archaeology projects to increase knowledge of heritage assets

Furthermore, while 'People' help to identify heritage assets of local and national importance, they also help to go beyond the physical preservation of heritage features. A more interpersonal approach is needed to gather and understand the full range of information and associations with specific features and assets, and pursue opportunities for public benefit.

Box 7. Extract from The Southern Uplands Partnership position statement on trees, forests and woodland:
"The loss of cultural sites and archaeological landscapes has been one of the most damaging consequences of forestry in recent years. These are often unrecognised at the time and their significance unrecorded." (SUP 2021)

8.2 Evidence of the issue

The SUP / BFT study documents experience in the Scottish Borders, where official data used in new planting applications omits archaeology known to local historical societies. It calls for better stakeholder and local community involvement to identify sites and protect them.

An example from the forthcoming study of community experiences, in this case highlighting poor practice, is described in Box 8.

Examples of good practice on public forest land are documented in Forestry Commission Scotland (2012), for example at Cally Woods, Gatehouse of Fleet (Box 9).

Box 8. Kilmartin Glen case study
An application for new planting in Kilmartin Glen, by a well-known forestry company, illustrates failure to follow the spirit and letter of the UKFS, to the detriment of all concerned. The application was in the first instance rejected by Scottish Forestry. A subsequent proposal was dropped after limited consultation. The original proposal of about 70ha of mainly Sitka spruce was withdrawn by the agent once it became clear that there was both a growing body of vocal local concern about a proposal that no one knew anything about, and that there would be substantial obstacles in getting approval. It intruded upon a Property In Care archaeological site, and other archaeological features. Landscape, tourism and biodiversity features were also affected. A smaller less intrusive scheme was then proposed. This revised scheme was then also judged to require an EIA, and to contain elements that were not UKFS compliant.
The company decided to further test the water and a small scoping meeting was called. At this meeting it became apparent that the proposals were unlikely to make headway given the features that existed on the site, and the scheme appears to have been permanently abandoned (although of course the owners are free to submit a revised scheme at any time). While this was regarded as a good outcome by the local community, they were also left somewhat bemused by a process that allowed an afforestation proposal to be brought forward without any meaningful engagement with neighbouring residents.
The forestry company involved did not follow the 'spirit' nor 'letter' of UKFS, and the process wasted their time and money, damaged their reputation, and wasted Scottish Forestry resources.

Box 9. Cally Woods. Local community involvement in management of national forest and land
The process of developing a management strategy for the Fleet Valley National Scenic Area used a participative process with local communities, and reflected community aspirations for their local landscape. One of the actions in the Cultural Heritage Action Plan for the Fleet Valley NSA (2003) was: Support production of landscape management plan for the designed landscape at Cally. Meetings were then held with all the stakeholders at Cally and the need for a management plan was agreed. Gatehouse Development Initiative (a charity established by the Community Council) secured funds in 2007 to produce the Cally Management Plan and have been involved in its delivery ever since. They have been very successful at securing funds to drive forward actions and have a committed team of Fleet Valley volunteers who regularly undertake tasks in the woodland. As a result, people know and value the Woods more and have a pride in the history and the restored heritage. They have a direct relationship with FLS staff and work on management issues together.

8.3   Recommended changes

UKFS2017 says: 'Forests should be designed and managed to take account of the historical character and cultural values of the landscape.'

Many applications particularly for new forestry are failing to meet this criterion, because they do not seek the knowledge nor incorporate the values of relevant communities of interest and place.

The revised UKFS should recognise the need for stakeholder and community engagement to fulfil this criterion.

9 Organisations supporting this paper

This call to enhance the People element of the UK Forestry Standard is supported by:

Archaeology Scotland

British Horse Society Scotland

Chartered Institute for Archaeologists

Communities for Diverse Forestry

Councillor Dougie Campbell, Environment Champion, Dumfries and Galloway Council

Carsphairn Community Council

Crossmichael Community Council

Cycling UK in Scotland

Dr Coralie Mills of Dendrochronicle and Scottish Environment LINK Honorary Fellow

Finlay Carson MSP

Forest Policy Group

Galloway and Southern Ayrshire UNESCO Biosphere

Innerleithen and District Community Council

Laura Moodie, Scottish Greens

Lamancha, Newlands and Kirkurd Community Council

Manor Stobo and Lyne Community Council

Mountaineering Scotland

National Trust for Scotland

Nature Friendly Farming Network

Propagate - Rethinking Local Food

Ramblers Scotland

Reforesting Scotland

Royal Burgh of Lochmaben and District Community Council

St Johns Town of Dalry Community Council

Scottish Wildlife Trust Stirling & Clackmannanshire Group

Scottish Wildlife Trust

Southern Uplands Partnership

Trees for Life

Tweedsmuir Community Council

Wanlockhead Community Council

Woodland Trust Scotland

10 Acknowledgements

11 References

The economic contribution report:

CJC Consulting (2015). The economic contribution of the forestry sector in Scotland. CJC Consulting: 38 pp. Available at: https://forestry.gov.scot/forestry-business/economic-contribution-of-forestry

Confor's response to the UKFS consultation 2021:

Confor (2021) Overview of the UK Forestry Standard. Confor response to the consultation. 6 pp. Available at: https://www.confor.org.uk/media/2678154/ukfs-consultation-response-aug-21.pdf

The Cally Woods case study:

Forestry Commission Scotland (2012): Managing the Historic Environment Case Study. 38 pp. Available at https://forestry.gov.scot/publications/forests-and-the-environment/historic-environment/73-managing-the-historic-environment-case-study

The SUP / BFT report study:

Lawrence, A. and P. Tabor (2020). Stakeholder engagement to inform development of a Regional Woodland Creation Framework. Report commissioned by Scottish Borders Council. Southern Uplands Partnership / Borders Forest Trust.: 81 pp. Available at: https://forestry.gov.scot/publications/817-stakeholder-engagement-to-inform-development-of-a-regional-woodland-creation-framework-scottish-borders-pilot-areas-1-2

The SEPA report:

SEPA (2020) Forestry and wood processing sector plan. 50 pp. Available at https://sectors.sepa.org.uk/media/1180/forestry_and_wood_sector-plan_feb_2020-v6edits.pdf.

The Southern Uplands Partnership position statement:

SUP (2021) Our vision for trees, forests and woodlands in Southern Scotland. The Southern Uplands Partnership. Available at http://sup.org.uk/publications/

Evidence on the contribution of small local businesses:

A suite of case studies of small local forest-based businesses can be found at:

http://www.forestpolicygroup.org/case-studies/

Watt, G. and W. McGhee (2018). Estimating the Size of the Economic Contribution of Small Scale Woodland Related Businesses in Scotland. August 2018. Unpublished report Forestry Commission, Edinburgh 2018.

Worrell, R., Lawrence A., Watt G., Pepper S. and W. McGhee (2018). "Small local forestry businesses in Scotland." <u>Scottish Forestry</u> **72**(3): 38-44.

Appendix 1. Forestry Statistics: data on new planting by size category and by Conservancy.

FGS approvals to July 2021

Size Category	#	# %	Area (ha)	area %	Cost £	£ %
<5 ha	396	28.3%	959	1.7%	6,634,413	2.9%
5-10 ha	220	15.7%	1,597	2.9%	9,778,040	4.2%
10-20 ha	211	15.1%	3,064	5.6%	17,876,006	7.7%
20-50 ha	304	21.7%	10,453	19.1%	53,538,582	23.1%
50-100 ha	140	10.0%	9,975	18.2%	43,420,990	18.7%
>100 ha	130	9.3%	28,801	52.5%	100,978,560	43.5%
Total	1401		54,849		232,226,590	

FGS options by Conservancy to July 2021

Woodland Type	H&I	Grampian	P&A	CS	SS	Area
Conifer	1,109	1661	7548	3,680	14001	27,998
Diverse Conifer	896	764	861	282	938	3,741
Broadleaves	293	112	665	367	271	1,707
Native Broadleaves	2,679	376	2113	724	1617	7,509
Native Scots Pine	2,655	786	692			4,132
Native Upland Birch	3,675	79	1184	305	163	5,405
Small / Farm Woodlands	23	85	105	109	211	532
NB in N&W Isles	66		3			69
Native Low Density	243	13	272	3	164	695
Nat Regen	1,994	968	94			3,056
Total	13,632	4843	13535	5,471	17363	54,844

Note that the discrepancy in total area appears in the published figures. More recent updates are available for the second table, but not the first, publication of which was discontinued after July 2021.

Appendix 2. Suggestions for rewording UKFS requirements

Page no.*	Current wording	Suggested rewording
124	Consider the appropriate level of visual diversity: this will depend on the location, scale and character of the landscape.	Include cumulative impacts of existing woodland and other local proposals in progress.
127	Identify what makes a place special or unique and consider how forest design can conserve and emphasise these qualities, rather than detract from them.	Include local communities in identifying what makes a place special or unique and consider how forest design can conserve and emphasise these qualities, rather than detract from them.
137	Where uses of woodland are established by long tradition they should be respected and allowed to continue, providing the use is sustainable and not detrimental to management objectives.	Where uses of woodland are established by long tradition they must be respected and allowed to continue, providing the use is sustainable and not detrimental to management objectives.
137	Consideration should be given to involving people in the development of forestry proposals who have a recognisable interest in the proposal or its outcomes.	Local people must be given the opportunity to be involved in the development of forestry proposals and their outcomes
137	Consideration should be given to promoting and facilitating local forest and woodland-based enterprises and economic activities.	Opportunities to promote and facilitate local forest and woodland- based enterprises and economic activities should be explored.
138	Local people and interested parties can offer valuable knowledge and insights that can be of great assistance when formulating forest management proposals.	Local people and interested parties can offer valuable knowledge and insights that can be of great assistance when formulating forest management proposals and woodland creation schemes.
138	Consider engaging with the local community by seeking their views, developing proposals that are responsive to them and building co-operative partnerships.	Engage with the local community by seeking their views, developing proposals that are responsive to them and building co-operative partnerships.
138	as part of the forest planning process, consider which individuals and organisations from all groups in society may have an interest in the formulation of forest management proposals, or something to contribute.	as part of the forest planning process, identify which individuals and organisations from all groups in society may have an interest in the formulation of forest management proposals, or something to contribute.
138	aim to communicate forestry proposals and their operational impacts clearly; consider presenting several options and try to accommodate local needs where they are compatible with management objectives.	Communicate forestry proposals and their operational impacts clearly; consider presenting several options and try to accommodate local needs where they are compatible with management objectives.
138	Consider the cultural significance of woodland features, taking account of local opinion, and develop measures to protect important features in forest management plans.	Ascertain the cultural significance of woodland features, taking account of local opinion, and develop measures to protect important features in forest management plans.
139	Consider increasing public access to forests and options for how this could be achieved.	Pro-actively attempt to increase public access to forests and explore options for how this could be achieved.
141	Consider providing facilities for public recreation within forests and woodlands and how these can be managed.	Wherever possible, provide facilities for public recreation within forests and woodlands and consider how these can be managed.

141	Consider developing partnerships with health interests to establish and promote forest recreation activities in relation to health and well-being.	Wherever possible develop partnerships with health interests to establish and promote forest recreation activities in relation to health and well-being.
141	Consider permitting the use of forests for sustainable low-key community uses, especially where such uses are linked to cultural activities or are established by tradition.	Encourage the use of forests for sustainable low-key community uses, especially where such uses are linked to cultural activities or are established by tradition.
142	Consider providing, or encouraging others to provide, educational interpretation for visitors – especially if a particular wood has distinctive ecological, historical or cultural features.	Provide, or encourage others to provide, educational interpretation for visitors – especially if a particular wood has distinctive ecological, historical or cultural features.
144	Consider the potential for developing sustainable woodland-based businesses and livelihoods and how this might be explored with interested parties and through local co-operation.	Ascertain the potential for developing sustainable woodland-based businesses and livelihoods and how this might be explored with interested parties and through local co-operation.

* page numbers refer to UKFS 2017