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Submitted to Future Grant Support for Forestry
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Ministerial Foreword - Forestry in Scotland is a sector that we can be justly proud of.

1 - Introduction and Rationale for Providing Grant Support for Forestry

1. Do you agree that grant support for forestry should continue to be improved and developed as a discrete scheme within the overall package of land support?

Yes

Please explain your answer in the text box.:

It is important that the FGS retains a separate identity and do not become subsumed into a wider single agri-environmental scheme run by some other government agency. However it is important that all such schemes are closely aligned and deliver an integrated range of options. Currently there is no synergy between FGS and Rural Priorities.

2. Are there any changes that would allow for better complementarity between the forestry and agriculture funding options?

Yes

Please explain your answer in the text box.:

For many years as a consultant on the ground I have seen little or no joint working between RPID and SF. There appears to be no interest within RPID in helping to support the afforestation targets and to integrate forestry into the IACS system. An example of this is that RPID does not currently have a representative on SF's Customer Representatives Group.

This must start at a high level and there must be much more of a concerted effort to break down the fences between farming and forestry. I was a farm woodland adviser for over thirty years and saw very little change in attitudes over that time.

As a result of this most forestry consultants know little or nothing about agri-environment schemes and agricultural consultants are equally ignorant about forestry and may even be biased against it.

For example any native type woodland should be allowed to count towards some of the habitat creation requirements.

2 - Forests Delivering for Scotland's Climate Change Plan

3. How can the support package for forestry evolve to help tackle the climate emergency, to achieve net zero, and to ensure that our woodlands and forests are resilient to the future climate?

Please explain your answer in the text box.:

All Government agencies that own land, either directly or as landlords, e.g. some crofting estates or Crown Estate Scotland, should assess the opportunities for forestry and set appropriate planting targets. This especially will need to address the barriers faced by tenants.

Restocking grants too complicated; penalise smaller woods for which the cost of restocking is often not covered by the sale of timber. I have told people to just let the wood blow down – they can't afford to fell and restock. People may restock using the easiest or simplest option rather than the best. Or due to costs the quality of the restocking ends up being very poor.

4. Private investment through natural capital and carbon schemes can make a valuable contribution to climate change. Do you agree that the grant support mechanism should have more flexibility to maximise the opportunities to blend private and public finance to support woodland creation,

Yes

Please explain your answer in the text box.:

There needs to be clear recognition in the scheme that not all forestry schemes are eligible for carbon funding. This could be because they do not pass the additionality test or it because they are too small for carbon funding to be viable. For small schemes the administrative costs and fees of carbon support are too high.

There could be differential grant rates for carbon and non-carbon supported afforestation. Or more simply this might be expressed as distinctly separate grant rates for the conifer options which recognises that generally they are not eligible for carbon funding.

5. How could the current funding package be improved to stimulate woodland expansion and better management across a wide range of woodland types, including native and productive woodlands?

Please explain your answer in the text box.:

1 Smaller woodlands, say less than about 5ha but up to 20ha, have much higher unit costs and the scheme must recognise this with a substantially higher basic grant for planting, maintenance and fencing.

2. All capital grants should be adjusted for inflation.

3. The Public Registers provide very little information and I doubt that there are many responses to schemes as a result of being on the register. In my experience, mainly with smaller woodlands, the register does little more than delay applications by a month. The threshold for the register should be raised to 5ha or 10ha. We can compensate by having stricter requirements and evidence for prior consultation with stakeholders and site assessment, e.g. against Mapviewer and Sites and Monuments Records.

4. Some (many?) people who would like to plant smaller woodlands are not VAT registered. This has the effect of increasing costs by 20%. See comment #1 above. I am an example of this. I am a private householder and have a couple of acres ideally suited to riparian broadleaved woodland but cannot afford to plant it up.

5 Trees and Sheep. SF need to review the rules of the Trees and Sheep option for woodland creation. In my experience they currently restrict afforestation.

The rules restrict an applicant to up to fifty hectares of productive woodland creation, (conifer or diverse conifer). They do not allow additional non-productive woodland creation or natural regeneration to be included in the same application, even on contiguous land. In fact I have been advised that one cannot plant a contiguous area with any type of woodland for five years. It may be that this is an unintended consequence as no-one has explained the reasons for this rule and I can think of no logic behind it. [Redacted]

6. Tree shelters. Plastic shelters should be phased out asap. Good biodegradable shelters are now available but are very expensive. The grant for shelters should be substantially increased to compensate for this and only biodegradable shelters should be allowed, after a short transition period. Also only naturally durable treeshelter stakes (larch or chestnut) should be allowed. Treated softwood stakes should be phased out. This would also have the effect of supporting small local sawmills. This could easily be evidenced by requiring a copy invoice with the grant claim.

7. Scrap the clearing process. It just adds another two/three week average delay to an application and is of no benefit to the applicants. It's probably time-consuming for SF also. I recall this was one of McKinnon's recommendations.

8. There is often a lot of emphasis on having supporting management plans. In my experience these are often no more than a tick-box exercise. Owners seldom engage with these and with a high turnover of forestry staff they are quickly forgotten and just gather dust. They are seldom referred to again.

I find the same problem with forest plans. Owners do not follow them and constantly change their minds about what they want to do and when to do it. Factor in storm damage and one of my clients is now on his fifth amendment.

9. Who ultimately is responsible for meeting woodland creation targets? Who gets the knighthood for breaking the target three years in a row? Who gets the boot for continued failure to meet targets? OK, I know this is facetious but we really need SF to display a 'can-do' attitude. Let's challenge the bureaucracy and do away with anything that is obstructive, unhelpful and irrelevant.

6. Do you agree that it should be a requirement of grant support that woodlands are managed to ensure that they become more resilient to the impacts of climate change and pests and disease?

Not sure

How can the grant scheme support this?:

Overall woodlands in Scotland are very diverse. It is hard to build a lot of diversity into a new woodland that by definition is even aged and we shouldn't beat ourselves up trying to increase 'resilience' into each individual wood - whatever that means. Diversity naturally increases with age. There is no point in planting low yielding alternative species if they produce poor quality timber that the market does not want.

What we do need though is much more information on which to base management decisions. For example do Yield Tables fully reflect current silvicultural practise? Do they allow for improved planting stock which often has different characteristics and very high growth rates? For example for Sitka there are no tables for 1.9m spacing; no tables for a single thinning only and they stop at YC 34 despite many crops growing at up to YC 40.

Similarly how wide is the evidence base for Forest Gales? The research base for this also needs to be updated to allow for higher yield classes, different ground preparation techniques and predicted climate change. After storm Arwen I saw little correlation between Forest Gales predictions and the actual damage that occurred.

This all makes meaningful planning much harder.

3 - Integrating Woodlands on Farms and Crofts

7. Which of the following measures would help reduce the barriers for crofters and farmers wanting to include woodland as part of their farming business? Please select all that apply.

Better integration of support for woodland creation with farm support mechanisms, Flexibility within options

Are there others not listed above?:

Apart from the two boxes ticked none of the other options listed are very relevant. There is no shortage of advice, cash flow support, information and guidance. e.g. from SAC, Woodland Trust, agents and other organisations. Also there is the Agroforestry Handbook.

I worked as a farm woodlands adviser for thirty years and none of these were problems. The only consistent problem was the relatively poor support for smaller schemes.

There is sometimes (ill-informed) hostility from agricultural interests and SF does little or nothing to challenge this. It is left to Confor and agents.

Better integration is essential but in over thirty years I have seen absolutely no interest in integration from RPID. In fact they almost treat SF with contempt.

EFAs should be extended to cover a greater range and scale of woodland types. Limiting this to Small Farm Woodlands, which have to have a conifer content, is ridiculous. Up to 25 ha of any native woodland type should be allowed.

AGROFORESTRY

The current agro-forestry option is not fit for purpose. Eligibility requirements and scope are far too restrictive and I have always had the impression that SF have little desire to support this option.

It should have:-

- more flexibility on stocking densities
- allow a greater range of species, e.g. fruit trees, woody shrubs
- allow a greater range of regimes - for example free range chickens under fruit trees is not allowed.
- considerably higher payments for the cost of shelters
- grant support for fencing and gates. This is essential for pastoral systems where grazing needs to be controllable.

Agroforestry is also about shelter for shade and against wind. This is not recognised or allowed and the emphasis on productive broadleaves, (for quality timber???) is naive.

Rather than being prescriptive, applicants should be allowed to design the scheme that meets their objectives. This can then be discussed on its merits with the woodland officer and support agreed.

8. Establishing small woodlands can have higher costs. What specific mechanisms would better support small scale woodlands and woodland ownership?

Please explain your answer in the text box.:

Very many people enquire about small schemes and are rapidly put off by the high net cost and don't proceed. This gives afforestation a bad press. These people are very unlikely to come back at some future time to investigate larger schemes. There are so many smaller areas, <5ha or so, that could usefully and beneficially be planted that fail to proceed. The current rules work against these areas and their high unit costs in so many ways.

These issues can be addressed by some combination of the following (which may repeat points I have made elsewhere).

- Higher planting and maintenance grants across the board for smaller woods, say less than 20ha.
- A lump sum Planning and Preparation grant.
- Make the options less prescriptive - the Small Farm Woodlands option is far too complex. and it is difficult to see what this seeks to achieve.
- Allow ploughing for ground preparation without the penalty of a lower grant rate. On most lowland sites the soil carbon content is low so the method adopted for ground preparation does not really affect the carbon balance. Ploughing is one form of ground preparation that farmers can readily do themselves. This gives them some involvement in the scheme and avoids the costs of bringing in a contractor with a moulder or a greater reliance on herbicides.
- Raise the threshold area for the public register.
- Reduce rabbit net specification to 19 gauge. Substantially cheaper, £2.90 against £3.25 per meter typical contractor charge, including labour – I suspect quite a few people are using this anyways on the basis that this is unlikely to be picked up during inspections. Although this does not directly benefit the farmer it will save SF a few pounds in grant costs each year.
- Some recompense for those who are not VAT registered.
- These barriers are also relevant to felling and restocking. Restocking costs can be very high; weevil and deer damage can be hard to overcome. For many small woods the proceeds from the sale of timber fall far short of the restocking costs.

4 - Forests Delivering for People and Communities

9. How can forestry grants better support an increase in easily accessible, sustainably managed woodlands in urban and peri-urban areas?

Please explain your answer in the text box.:

No comment

10. How can grant support for forestry better enable rural communities to realise greater benefits from woodland to support community wealth building?

Please explain your answer in the text box.:

No comment

11. How can the forest regulatory and grant processes evolve to provide greater opportunities for communities to be involved in the development of forestry proposals?

Please explain your answer in the text box.:

Far more attention needs to be paid to public consultation. Reports have been published on this recently. I tried to comment on one high profile native woodland scheme recently and the quality of information provided by the agent was abysmal. Although the 'consultation' was well publicised with press releases and signs at entry points there was only a single, poor map on the weblink and no other information whatsoever.

The public register is useless. It provides no information whatsoever other than a boundary map for schemes. It is really quite hostile to a lay-person.

This is a long-standing problem.

12. How can the forestry regulatory and grant processes evolve to ensure that there is greater transparency about proposals and the decisions that have been made on them?

Please explain your answer in the text box.:

More dialogue with consultees at all stages, by SF staff and agents/applicants. More evidence to be provided with applications - the issues log is too simplistic.

13. Forestry grants have been used to stimulate rural forestry businesses by providing support with capital costs. Do you agree that this has been an effective measure to stimulate rural business?

Not sure

a. How could this approach be used to support further forestry businesses?:

It would help to have more information on the scale and nature of support provided to date to inform comment.

My experience is limited. On one occasion the woodland officer/SF seemed to gold plate the requirements, e.g. insisting on features that exceeded the legal requirements.

It would be helpful if the scope of work covered by grant could be extended. For example I have done work with a small local sawmill. Grant aid only covers the basic equipment purchase. It does not extend to the new buildings also required. It is almost impossible to apply to other organisations such as HIE for grant for the buildings at the same time. All the funding ultimately comes from the same source so there should be more integration.

b. How could this approach be used to support further skills development?:

No comment.

14. How could the FGS processes and rules be developed to encourage more companies and organisations to provide training positions within the forestry sector?

Please explain your answer in the text box.:

No comment

5 - Forests Delivering for Biodiversity and the Environment

15. The primary purpose of FGS is to encourage forestry expansion and sustainable forest management, of which a key benefit is the realisation of environmental benefits. How can future grant support better help to address biodiversity loss in Scotland including the regeneration and expansion of native woodlands?

Please explain your answer in the text box.:

Currently natural regeneration seems to be discouraged by the low capital payment. For smaller schemes the costs of the management plan, the separate FGS contract application; need for a deer management plan but low payment rates, are all a disincentive.

16. Herbivore browsing and damage can have a significant impact on biodiversity loss and restrict regeneration. How could forestry grant support mechanisms evolve to ensure effective management of deer populations at:

Landscape scale?:

They can't. There needs to be a strong (political) will at national level to solve the problems of deer overpopulation. I see little sign that this really exists, despite endless consultations.

What proportion of FGS grants is spent on deer fencing?

Small scale mixed land use?:

I can't think that there is an easy answer to this problem. Roe deer are out of control in many lowland areas and the situation will only get worse as the amount of woodland cover increases. Red deer are also out of control. This is a national (political) problem.

There is no deer management or control on many properties and on many others the emphasis is on sport - not on crop protection. Even landowners with a significant forestry holding are often very complacent. I have had some very hard conversations with some clients about how urgently they need to change their approach to this, even then often they don't do anything about it.

I think the only solutions are

- 1 greater emphasis on protection when applying for grants. ?ask for more details of the protection measures.
- 2 more intensive inspections of schemes that are at risk from deer damage - especially restock sites where there is less likely to be deer fencing, and stronger enforcement where control is inadequate.
- 3 higher restocking grants with a contribution towards fencing costs and lower density requirements for broadleaves to make tubing less of a financial burden.

Also how about some strong support for reintroducing Lynx??

If you wish to make any other relevant comments, please do so in the text box below.

Please add your comments here.:

1 Please give serious consideration to the use of Challenge Funds. The Grampian Challenge Fund of the late 90s showed how effective these could be. It achieved double the original planting target area and the system of sealed bids for the challenge funding allowed for quality and budgetary control and good value for money as it established the true opportunity cost. A fixed payment challenge fund is less effective. It was effective in another way too. Nobody realised how productive these woodlands would be. YC in excess of 30 is common and I have woods of YC 36 or possibly higher. (I can't be sure as Yield Tables do not extend beyond YC34 - see earlier comments).

These woods could make significant impact in reducing the anticipated decline in timber harvesting in 10/15 years time.

2 Please introduce a new capital grant for 60cm easywraps or similar with a bamboo cane (these are not eligible for the 60cm tree shelter grant which requires a wooden stake, which should be scrapped as there are few circumstances where these should be used.) However they are rather more expensive than 20 cm voleguards and provide distinct benefits over the latter. Use of easywraps or similar is common on (grassy) sites inside a deer fence, especially if broadleaves are only a small proportion of the scheme where they can be easily overlooked during maintenance. It is often more effective to use these than to fit rabbit netting on the fences.

3 Be more willing to support (experienced) agents where (inexperienced) WOs are being un-necessarily zealous/ pernicky and generally complicating things!

4 The rules of any scheme may have some unintended consequences that serve as a barrier to uptake. Essential that SF act proactively to respond to these where identified. Also SF should actively seek to break down other barriers to woodland creation. These have been identified and discussed many times over the years but there seems to be a reluctance to tackle them as they are seen as too difficult or political. These include tenancy legislation; conflicting rules in other grant schemes and the BPS regime; lack of support from other government agencies, in particular where they are landowners or landlords; consultees who seek to obstruct rather than find solutions; lack of resources within SF to support large numbers of smaller schemes.....

5 Contracts & Bureaucracy

Stop re-issuing contracts every time a LPID changes. No need for this as the land can still be identified. Only amend the contract where the changes are significant or would seriously complicate records for IACS. The online system keeps a record of historical LPDs.

6 Modify software so the system can generate a partially prepopulated claim form. This will reduce all the errors in the applicant completing a claim form in manuscript and the office staff then having to, presumably, re-enter and check the data manually.

7 Do away with endless contract variations for minor changes to completed work, e.g. not using vole guards.

8. Speed up the process - it is still un-necessarily slow. For example I have had to wait five months for an approval for a straightforward and un-controversial two hectare native woodland. No changes were needed after submission - just painfully slow bureaucracy.

9. I will mention Challenge Funds again. The Grampian Challenge Fund was brilliant - it worked!!

About you

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Name:

[Redacted]

What is your email address?

Email:

[Redacted]

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Individual

What is your organisation?

Organisation:

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