

Submitted to Future Grant Support for Forestry
Submitted on 2023-05-17 14:40:42

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.:

In some regions the current framework that the FGS operates within is not sufficient to support positive decision making with respect to afforestation. Neither UKFS or Local Authority Local Development Plans (+ supplementary guidance) have demonstrated effective safeguarding against highly concentrated cumulative afforestation in areas that already have high levels of predominantly single species commercial forestry. Statutory and other consultees often have little or no capacity to comment or contribute to new woodland creation proposals or Long-Term Management Plan consultations.

This can have a negative impact on communities, habitats including waterways, and the reputation of forestry in general. It's also creating a resilience time bomb, not least for net zero targets and for securing future supply of homegrown timber. Far from being judged on what happened in the 70s and 80s, the industry and regulator is very much being judged on what's happening now.

The FGS review can address this by introducing safeguards such as cumulative impact assessments, a cap on predominantly single species schemes per catchment (work needs to be done to define the best method for deciding catchment, but this shouldn't delay implementation – interim catchments from woodland strategies could be used in the meantime). An emergency brake should be applied to areas that have already exceeded 50% woodland cover, with a second menu of options applied to further expansion. This second menu could use a progressive approach with new development dictated by the composition of the existing cover.

Open land and broadleaf elements in conifer schemes should be subject to long term management, and natural colonisation allowed as opposed to planting where possible.

We suggest the following improvements to the scheme:

- the scheme should ensure forestry is a land use that can address the twin climate and nature crises,
- diversify the species, age and structure of forests to increase their resilience,
- adapt the FGS to exceed new UKFS guidelines with suggested maximum for any single species at 50%,
- new planting should ensure no loss of priority species or habitats through improved prior assessment,
- effective and transparent consultation,
- adapting schemes to deliver connectivity with areas of high-nature value,
- introduce meaningful cumulative assessments,
- ensure designated open land and broadleaves have appropriate connectivity on a catchment scale,
- increase support for management of existing woodland,
- support deer management, driving funds towards this as opposed to fencing where possible.

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.:

We are supportive of farmers being encouraged to diversify into tree planting, adopting agro-forestry approaches, hedgerow creation, and small woodland creation, through payment options that can be tailored to the farm.

Linking opportunity mapping from Local Nature Network's (which is being developed by Nature Scot and partners) should be used to help inform agriculture and forestry support.

Scottish access rights and responsibilities are acknowledged as a public good and much valued by the public. This should be recognised as one of the essential standards to be met by land managers to receive forestry grant support or agricultural funding, so it would be helpful if this is referenced in the

grant funding requirements. New woodland creation has the potential to enhance our access networks and it must be mandatory in the grant scheme that any new gates or fences have pedestrian by-passes, which should never be locked. Rigorous monitoring and compliance should be enforced, with a one-strike policy followed by meaningful penalties for managers/owners that knowingly flout access rights.

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.:

The climate and nature emergencies are intertwined. The support package for forests and woodlands can contribute to tackling the climate emergency by prioritising woodland expansion and management which will benefit nature, improve climate adaptation in resilient landscapes, as well as promote carbon sequestration.

Other measures concerning how the FGS can contribute to addressing the twin crisis include more support for riparian planting, making natural colonisation grant options more accessible by extending the window for measuring success to 15 years as opposed to the current 5 years, introducing a resilience supplement for schemes that go 'above and beyond' the UKFS recommendations for species diversity, use levers to encourage natural colonisation buffers around existing ancient woodland including for PAWs restoration, target some fencing money towards deer control.

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.:

We believe that the grant scheme can play an important role in ensuring that supported projects address the twin climate and nature emergencies together. The scheme should help to stimulate the projects which will deliver for both imperatives. By focusing on enabling carbon sequestration in woodlands that also support nature, the FGS help to create a better balance in the economic stimuli for native woodland and commercially viable forestry.

As a backdrop to the FGS changes the government should put The Interim Principles for Responsible Investment in Natural Capital and Land Rights and Responsibilities on a statutory footing. This would assist in achieving a Just Transition by actively involving communities in the major changes required in land use to meet our climate and environmental commitments.

Given how ambiguous the UKFS is towards engagement and participation it's essential that the FGS and other regulatory levers plug the gap in Scotland. We must take prompt action to address what's currently perceived in some areas as a 'Gold Rush' or the 'Second Clearances'.

There are overlaps with question 10 here, please also refer to the answers there.

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.:

Woodland expansion and ongoing management can be significantly and cost-effectively increased through natural colonisation and regeneration. The success of natural colonisation could be assessed at 15 years instead of 5. Landowners should be able to demonstrate that their existing woodlands are well-managed before receiving grant funding for new developments.

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?

Yes

How can the grant scheme support this?:

Yes. To ensure long term climate mitigation, biodiversity habitat, domestic timber supply, flood alleviation and health and wellbeing, woodland creation and commercial afforestation must build in greater diversity (species, age, structure and management) for better resilience. Existing woodlands should be managed to become more resilient over time.

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, Knowing where to get reliable advice, Clearer guidance on grant options, Flexibility within options, Intervention level, Support with cashflow, Information on how current land use could continue with trees integrated throughout

Are there others not listed above?:

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.:

Make the FGS more accessible for small schemes, either by including a planning grant or simplify the process to empower individuals to make their own applications.

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.:

It makes sense to take a blended approach to increase accessible and sustainably managed woodlands in urban and peri-urban areas, integrating woodland grants with other funding streams such as those for health and wellbeing projects and active travel where possible.

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.:

The 'informal' community engagement stage of a new planting application or long-term management plan review, should be a formal requirement, properly evidenced.

Collaborative early planning – a more proactive approach to involving communities in the design phase of applications – would help to deliver more community benefit.

Toolkits and guidance including examples of agreements and case studies would be useful to all stakeholders.

With respect to community benefit and wealth, the current situation in parts of Scotland experiencing rapid afforestation with Conifer is contributing to community disbenefit and this needs to be addressed. Cumulative impact of multiple new planting applications is the single greatest contributor to negative impact on communities.

Stakeholders are at odds on how they interpret and represent 'access', and clear guidelines on how to improve access for communities, while avoiding loss of existing access particularly to favourite local areas, would go a long way to addressing concerns and improving relations. Locked gates with no pedestrian access are common place, and even where there is a pedestrian workaround it often isn't accessible to wheelchair users and people on horseback.

Support creating posts for local development workers / facilitators that can negotiate between companies and communities when developing planting applications, without prejudicing community council 'planning' responses. This would need financial support.

Introduce community benefit and/or community impact assessments

Managers/owners should be asked to demonstrate how woodland expansion and long-term management will fit with local place plans and community action plans to facilitate community wealth building and community benefit

9. The most direct route to community wealth through new woodland creation, is to support afforestation of community land. Proactive work by public bodies to support communities to make planting applications on land that they own, lease or have shared rights in, e.g. through a joint venture. A portion of the FGS funds could be reserved for this, and access to it promoted through for example the Community Woodlands Association

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.:

A 2022 report commissioned by Forest Policy Group provides an evidence base on this question:

Lawrence, A. and M. Paterson (2022). Communities' experiences of new forest planting applications in Scotland. Available at: http://www.forestpolicygroup.org/wp-content/uploads/2022/11/community_experiences_new_forestry.pdf: 39.

Many of the answers to Question 11 overlap with the answers to Question 10, because if communities are more genuinely involved in the development of forestry proposals they will derive more benefit (and less disbenefit) from the resulting planting.

Recommendations in the FPG report include:

- Prepare and agree guidance for communities and agents. The resulting document should be the same for all stakeholders, rather than separate guidance for agents and communities which plays into divisive 'them and us' perceptions. Include community representatives in designing this guidance, to ensure it is workable, and to create a sense of inclusion. Ensure the guidelines establish a clear context by explaining policy, regulation and decision-making processes, who the relevant players are, the different roles of Scottish Forestry and Forestry and Land Scotland, and the difference between the

regulatory body Scottish Forestry and commercial companies. They should also encourage dialogue and discussion about what people do want to happen on a case by case basis as well as through wider national initiatives. Include guidelines on an inclusive and friendly approach to identifying community representatives. They should address the role of communities of interest (e.g. place-based Friends groups, local wildlife groups) in addition to the role of community councils. They should ensure that engagement is seen as an on-going relationship not a one off hurdle to be endured.

- Incorporate the community engagement guidelines into the Forestry Grant Scheme as mandatory requirements and back them up with regulatory enforcement – not as part of a tick-box scoring exercise.
- Support these changes through training for communities, forestry agents and woodland officers which incorporates understanding of policy, methods and case studies.
- Explicitly refer to the Interim Principles for Responsible Investment in Natural Capital, the Land Rights and Responsibilities Statement, Just Transition principles, Community Engagement in Decisions Relating to Land and the Community Empowerment Act. Currently much commercial practice is not aligned with the voluntary Community Engagement guidelines. Incorporating these additional responsibilities should also help agents overcome landowner reticence to engage.
- Review permitted management objectives under the Forestry Grant Scheme to ensure all woodland creation meets the Scottish Government ambitions for a just transition. New planting applications must equally consider economic, environmental and societal objectives, and the community wealth building agenda.
- Consider making community councils and / or local land use forums statutory consultees for new planting applications.
- When evaluating delivery of grant-aided planting, include community perspectives in the evaluation.
- Reinforce the neutral position of Scottish Forestry. To many people they do not appear to be neutral, partially due to planting targets and partially due to a perception that they are 'on the side' of the industry.

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 transparency is needed in three areas:

1. Access to data: communities complain that they are sent a single map with no guidance on interpretation, and are often denied access to ecological and other data that would help them to respond; other developers do provide good access and help with interpretation, or even use community-gathered data / citizen science in developing their plans. A requirement to make all relevant planning data available to all consultees (statutory and otherwise) will help level the playing field.
2. Ability to access and read consultation responses from other stakeholders – the current lack of access is frequently reported as a frustration and feeds a belief in 'secrecy' of decision making.
3. Justification of decision made, referring to the consultation inputs, stakeholder concerns and how they have been addressed.

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?

Yes

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

Diverse management models such as continuous cover forestry, can be supported to create more opportunities for smaller businesses using low volumes of timber to create higher value products with a greater prospect of retaining revenue in local economies. Capital grants for equipment and training are key to supporting this approach.

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

Encourage companies to work together to share and rotate apprentices – working together would also be useful in maximising access potential across multiple sites, which is relevant to Qs 10 and 11.

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.:

Encourage apprenticeships, forest school training, encourage companies and organizations to help fund local development worker positions to help increase community capacity.

Work with a range of partners e.g. community development trusts (and other groups), enterprise sector, education providers and landscape partnerships etc. to support apprenticeships being placed in existing work places by funding the host organisation's capacity, as well as the apprentice's living wage.

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.:

Grant options that are responsive to cumulative assessments are a vital tool in addressing biodiversity loss. Evidence points to afforestation on sites with red list birds and rare species – individual schemes balance a trade-off between carbon sequestration and timber supply and these losses – but they aren't counted cumulatively.

Increase native woodland cover with a particular focus on natural colonisation (higher payments for natural colonisation over planted woodlands).

Increase support for riparian woodlands – adjust grants and guidance to reflect pro-active riparian woodland expansion and re-stock as opposed to avoiding negative impacts on water and watercourses.

Incentivise ancient woodland expansion through natural colonisation.

Incentivise deer management and invasive species control

Incentivise thinning

Phase out plastic tree guards in favour of biodegradable options

Support for mountain woodlands

Encourage natural pest and disease solutions as opposed to increased chemical use.

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?:

Ideally, we should transition away from fencing as default, to only fencing in specific circumstances as better deer management is implemented across Scotland. This results in a positive impact on the carbon footprint of woodland creation and reduces negative impacts on habitats and access.

Small scale mixed land use?:

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

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Organisation

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Communities for Diverse Forestry

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