

Submitted to Future Grant Support for Forestry  
Submitted on 2023-05-16 17:22:20

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.:

There are two questions here – should the Forestry Grant Scheme (FGS) be improved and developed, and should it remain discrete. Forestry works on a different scale of both land and timelines than agriculture, and has different constraint and opportunities, particularly in public use and expectations. Keeping forestry separate from agriculture will allow greater flexibility and specificity for forestry funding and projects. Currently claim deadlines are tied into agricultural timings. These currently lie in the middle of the main planting season, meaning projects cannot make use of the full season or otherwise have to delay or vary claims last minute, which has cashflow ramifications and can mean FGS funds unspent at the end of the year. The claim deadlines for FGS should be improved to fit with annual forestry cycles rather than being forced to align with agriculture.

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

No

Please explain your answer in the text box.:

Should be kept completely separate, to reduce complexity and allow scheme to properly fit the needs of the forestry industry. Agroforestry type options will ultimately lead to both bad forestry and bad farming.

## 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.:

Most diverse species are avoided due to uncertainties in suitability, yield and future value, in addition to universally higher establishment and early maintenance costs. Promote research and testing of alternative species through Forest Research. Through FGS, potentially target rate support for diverse species and mixtures to support higher establishment costs. Commit support to diverse productive woodlands in addition to native. Conifers are best suited to deliver carbon sequestration early on, to meet 2045 target. The scheme must be made more accessible to customers with defined timescales to give confidence to applicant and agents. Pest resilience and practices should be incentivised through the grant scheme. Suitable planting rates for species mixtures should be offered to make diverse but productive woodland creation viable.

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,

No

Please explain your answer in the text box.:

- Increases complexity, administration requirements and eligibility issues. SF is already under pressure with current FGS workloads.
- Reduced clarity of FGS availability / eligibility at early concept stages would hamper and discourage projects.
- WCC already handles additionality from private finance side.
- Grant eligibility should be kept as clear and simple as possible, to allow landowners to make informed decisions at early stages

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.:

- Increase species flexibility within options.
- Consider removing options and just using different rates for different species types. Rely on UKFS to control species proportions.

- Scrap the creation models and give better rates to diverse species to make them attractive; this will allow the correct species to be planting in the correct site rather than relying on a generalised model. E.g. Capital items for initial planting of different species / species groups rather than a single capital item for initial planting. Rely on UKFS to control species proportions.
- Target rates to support alternative conifers.
- Target rate for native woodlands in suitable sites (e.g. NBL within "x"m of riparian zones)
- Speed up processing of applications and approval times, to aid landowners cashflow planning.
- Rates for standard cost items need to be updated to current costs
- Increase rates for capital items such as fencing, protection and maintenance, especially for diverse conifers.
- Consider actual costs for fencing, or increase capital rates with inflation.
- Consider native SP as an honorary broadleaf to support its use as a native species. Expand pinewood zone, or use as a target area rather than eligibility area.
- Fast-track applications submitted by Chartered Foresters
- Funding must be given for specialist surveys – this is a huge barrier for many schemes

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?

No

How can the grant scheme support this?:

Support greater areas of Open Ground / forest road areas to increase accessibility for management, particularly for diverse conifers with higher maintenance requirements.

Target rates for mixtures or alternative species, to make these commercially attractive options.

Some sites (e.g. upland / peaty forests) have very limited species choice (restocking on deep peat guidance) and management flexibility (wet soils / high exposure). Their ability to increase diversity is limited. Ensure any diversity / resilience requirements are reasonable and proportional considering the site characteristics.

Ultimately the site should dictate what is possible, which is in line with UKFS. Grant must not dictate silvicultural practice.

Grant support for biodegradable tubes or alternative methods is the only way to incentivise and reduce the use of plastic within the industry.

### 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.

Are there others not listed above?:

No comment

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.:

- Small grant applications are generally just as onerous as larger scale ones.
- Simplify grant application and supporting information requirements for small projects.
- Fast-track process for small / simple applications.
- Reduce 3rd party survey requirements for schemes under a certain area.
- Maximise flexibility and simplicity of the scheme.
- For low value schemes – allow the Woodland Officer / Operation Manager to approve scheme without the need for the clearing round.

### 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.:

CSGN and WIAT works.

Wider visibility and advertisement to FGS and benefits to pertinent landowners.

Expand CSGN type scheme or target rates to all urban fringes, not just the central belt.

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.:

Grant support / target rates for projects with new / improved public footpaths.

Provide education for community groups on forest management.

Educate community groups and the wider public so that they have a better understanding of forestry. This will improve engagement with forestry professionals.

Support community groups in engaging forestry professionals for advice - e.g. community only grant to engage forestry professionals, particularly for preparing woodland creation proposals.

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.:

Clarify and standardise consultation requirements, depth and timescales, to ensure community responses are received at an appropriate stage.  
Ensure SF and applicant are clear and in agreement of consultation scale and methods at early stage.  
Formalise customer charter with milestone deadlines and timescales for application process. Enforce these deadlines on SF side.  
Community engagement can be highly variable. Sometimes communities are simply not interested and chasing for engagement is futile. Sometimes community comments are unreasonable or unfeasible. Ensure SF will not unreasonably delay projects in these situations.  
Scottish Forestry need to support forestry in the face of opposition, we do not feel that this has been the case in the recent past.  
Have SF provide clear justification for requests, based on published guidance.  
Clearly separate regulation and grant. The public do not need greater opportunities to comment on commercial only operations.  
Formalised Deadlines must be imposed and followed by Scottish Forestry. If no-one comments then Scottish Forestry cannot require a response before considering application. Scottish Forestry must also decide if comments are viable and justify why.

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.:

The Issues log is currently unwieldy. Different Woodland Officers use it differently from project to project. It overlaps with both the scoping report and constraints and opportunities analysis. Refine issues log to make it more streamlined and readable for non-foresters and reduce repetition of information presented elsewhere.  
Clarify requirements, expectations and deadlines of consultation for both applicants and stakeholders.  
Prevent projects being held up by needing to wait for or chase responses from stakeholders.- Formalise customer charter with milestone deadlines and timescales for application process. Enforce these deadlines on SF side. Have SF provide clear justification for requests, based on published guidance.  
Publish clearing round dates, set timescales for requesting for information and deadlines for meeting clearing rounds.  
Justification of Scottish Forestry decisions and comments. Standardisation across all conservancies as standards vary widely between regions.  
The personal opinion of SF staff, particularly those in high positions must not be allowed to be used as policy or scheme requirements without proper justification.

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?:

Streamline process and clarify eligibility criteria. Increase and simplify grant availability for specific operations (e.g. road / path construction, thinning, infrastructure).  
Encourage productive management rather than conversion to NBL.  
FGS is about trees, businesses stimulation should be addressed under a different mechanism.

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

Institute of Chartered Foresters Earned Recognition scheme. Provide incentive for foresters to achieve and maintain chartered status.

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.:

This is not appropriate for FGS – same reasons as Q13

## 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.:

Clarify who is responsible for deer in Scotland: SF or NatureScot.  
Support fencing for creation and restocking / ongoing management.  
Grant to support non forestry conversion. Wetland, peat, edge effect.  
Need grants for ponds and wetland.

Increase NBL species percentages within conifer options (or remove options). Would reduce complexity of requiring multiple options in a project and encourage larger and more functional NBL areas within conifer options.

Target rates for NBL in suitable sites, e.g. riparian zones.

Increase support for marginal native woodlands, such as treeline woods, where density and yield class would be lower.

Fast track / reduce supporting info requirements for target native projects.

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?:

Capital item to support biodegradable tubes and vole guards. Increased fencing rates, and allow fencing of external open ground to promote habitat and forest regeneration.

Simplified grant for deer counts on landscape scale, to support detailed deer management planning. Current grants are complicated, with different rules and options for woodland areas and open hill. Have a single integrated deer management grant process.

Make responsible authority and management requirements clear (Nature Scot or Scottish Forestry?)

Small scale mixed land use?

Small scale mixed land use?:

Capital item to support biodegradable tubes and vole guards.

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

Please add your comments here.:

Improve processing times and have clear milestones

Stop prioritising woodland creation over LTFP / WIG which is causing the detriment of existing woodlands

Publish and follow own guidance. Stop adhering to guidance that is not yet published. There have been historic instances of SF enforcing guidance that has not yet been published.

Do not add additionally to grant applications.

Index linked capital grants that are reviewed annually.

National panel voting – including private sector.

Process LTFP / Management Plans within a reasonable timescale – current system causes forfeit of annual grants (Squirrels) or event restocking grant when management plan expires during the contract period and SF take too long to review and approve the replacement.

SF needs to learn the difference between being a regulator and manager. Stop trying to make and impose management decisions on silviculture, or personal opinions. If an application meets the requirements then it should be taken forward, not amended to satisfy the will of SF.

## About you

What is your name?

Name:

[Redacted]

What is your email address?

Email:

[Redacted]

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Highfield Forestry Limited

Scottish Forestry would like your permission to publish your response. Please indicate your publishing preference:

Publish response only (without name)

We may share your response internally with other Scottish Forestry policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Forestry to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent