

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.:

We agree that grant support for woodlands and forestry should continue as a discrete scheme in the overall package of land support for now, but that the scope to integrate it more fully with the rest of land support is considered over time. While there may be advantages to integrating forestry grants with other support for land management to address cross-cutting issues such as invasive non-native species, any such future integration should only proceed if there is confidence that the necessary processes will be in place and sufficiently resourced to be effective in practice.

A review of the Forestry Grant Scheme commissioned by the Scottish Environment LINK woodland group found that the current system works well, including the structure of Scottish Forestry and the regionalised conservancies. The review found that the Conservancy model can work well in that Conservancies have a high degree of autonomy. Day to-day decision making is devolved to a regional level, and this can make Conservancies responsive to regional and local needs. How well they respond depends on the internal dynamics of each Conservancy and anecdotal evidence suggests that some Conservancies are more responsive than others. For good administration of the future grant, we believe that there needs to be a balance between central Scottish Forestry and conservancy staff, with HQ staff making broad policy decisions that reflect government strategic land use policy and conservancy staff administering the FGS in the regions, using their knowledge of regional community and land-use needs, ensuring that their decisions are compatible with regional land use strategies.

We think the highest priority for the future grant scheme evolves to position forestry as a land use that can address the twin climate and nature crises. We propose that the points below are the best-value adjustments to make in order to position the Scottish forestry and woodland sector for the future. Our consultation response will provide further details in relation to these points which we want to see addressed in the short term and other recommendations to consider in the medium to long-term.

Diversify the species, age and structure of forests to increase their resilience

- Adapt the FGS to meet the new UKFS new suggested maximum for any single species at 65% and offer a 'resilience supplement' to those schemes that go below the 65%.
- New planting on open ground should ensure no loss of priority species or habitats through improved prior assessment, effective and transparent consultation, and adapting schemes to deliver connectivity with areas of high-nature value.

Increase support for management of existing woodland

- Landholdings with ancient woodlands, must demonstrate that these woodlands are in positive management for biodiversity before additional forest or woodland creation is supported through the FGS.

Support and facilitate sustainable deer management

- The FGS should drive a reduction in deer numbers and their impacts to levels that allow natural regeneration and colonisation, using the Woodland Herbivore Impact Assessment methodology for assessing whether browsing impacts have reached the necessary levels on the ground.
- Deer fencing should only be used as a last resort to enable habitat recovery. The savings made in fencing expenditure should be transferred to supporting the above deer population management, which should result in no net increase to the cost requirements of the FGS.

Increase support for natural colonisation and regeneration to achieve a significant proportion of our woodland expansion aims for the future. Stocking density expectations should be much lower for gradually establishing new native woodlands, primarily for conservation purposes.

- For natural colonisation, a stocking density return should be completed in the first 15 years after establishment.
- Offer a 'nature supplement' when natural colonisation is targeted at buffering Ancient Woodland (both Ancient Semi-Natural Woodland and Plantations on Ancient Woodland Sites that are being restored).

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.:

Woodland creation at the pace and scale that is needed to address the twin climate and nature crises comes with inherent risks for places that are already valuable for wildlife. Some of our most important non-woodland habitats have been damaged or destroyed by afforestation. This undoubtedly resulted in severe losses of biodiversity, particularly where non-native conifer have been planted at scale and on more diverse examples of open habitat. In recent times species-rich lowland grasslands and heathlands (high nature value farmland) have been particularly affected and historically, bogs and sand dunes have historically been affected. We therefore recommend that:

1. A habitat survey and report is submitted with all potential afforestation sites where semi-natural vegetation is present. A facility could be created for the FGS to cover applicants' costs for this.

As a guide, all in costs could average £4-£5 per ha for upland sites, and for smaller lowland sites, which take less than a day to survey be capped at £250. Written advice from a NatureScot, Scottish Forestry or SGRPID advisor, competent in habitat identification, could negate the need for contracted survey

on smaller sites, where such support was available.

2. FGS grant support is also made available for species surveys when required to inform sensitive forestry applications – e.g. breeding bird surveys.

3. FGS support for afforestation applications is made conditional on avoiding the net loss and/or damage of priority habitats and species, with any unavoidable losses of priority open habitat offset by native woodland habitat creation. This could be deployed anywhere in the applicant's landholding, as per the control of woodland removal policy requirement to afforest an equivalent area.

4. That a grant covering the actual cost of removing non-native planting to reverse habitat loss is made available for restoring native woodlands and open habitats in farmed landscapes (e.g. peatlands and sand dunes). The cost per ha should be calculated on the basis of the cost required to undertake the operation, felling and extracting the timber minus any income from timber. If the timber is not extractable, mulching or cross cutting the timber could be used. Such support must be used in tandem with grant to remove non-native tree regeneration in the years after the initial operation.

The Government's target of 18,000 ha of new woodland from 2024/25 will result in significant land use change, with significant economic and social impacts on the rural community. We acknowledge that to meet the recommendations of the Committee on Climate Change, a degree of land use change will be needed, but the LINK woodland group would not support the conversion of good agricultural land to afforestation. This is an area that needs careful management by the Scottish Government. However, we are very supportive of farmers being encouraged to diversify into tree planting, adopting agro-forestry approaches, hedgerow creation, introducing single trees to farmscapes and small woodland creation, through payment options that can be tailored to the farm, and that farmers are used to using.

Riparian woodlands have a very significant role to play in the future of nature in farming landscapes. Currently, FGS offers a 'Woodlands for Water' woodland creation option for landowners in priority areas to improve water quality and natural flood management. These riparian woodlands also offer significant benefits for biodiversity. The Agri-Environment Climate Fund (AECS), due to end in 2024, offers a grant of £495.62 per hectare per year for 'Water margins on Arable Fields'. Taking inspiration from AECS, FGS could build upon 'Woodlands for Water' by administering a grant for riparian woodland creation or regeneration available to all arable and livestock farmers, with a yearly per hectare payment that fairly reflects losses in crop yield or grazing value from the change in land use. The option should stipulate a minimum buffer width of 10m to deliver positive impacts for biodiversity and the water environment. We discuss this value of this proposal for securing the environmental benefits of beavers under Q15.

We recommend that payments for the integration of well-planned agroforestry on farms sit within Tiers 2 and 3 so that these can sit with other nature restoration and climate mitigation measures as part of farm support. This governance of the schemes can ensure they are designed for the farming community. Some options should sit within Tier 4 and the future tree planting grants - these should be for woodland creation over a certain threshold (this threshold can be determined in discussions with Scottish Forestry) on marginal land/areas set aside for biodiversity and woodland planting for timber production. We have set out recommendations to ensure that new tree planting does not damage important high biodiversity habitats in our wider response.

To ensure better complementarity between wooded and non-wooded land to tackle cross cutting issues such as rhododendron and other INNS, and deer management, there should be mechanisms within the future schemes that allow the management of these threats across land use boundaries.

Scottish Environment LINK is a strong advocate for better holistic landscape scale management. There is an obvious role for Regional Land Use Partnerships/Frameworks and local Nature Networks to help inform priorities. 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.

In addition, Scottish access rights and responsibilities are acknowledged as a public good and much valued by the public. All land managers have a statutory duty under the Land Reform (Scotland) Act 2003 to respect access rights. This should be recognised as one of the essential standards to be met by land managers in order to receive forestry grant support or agricultural funding, so it would be helpful if this is referenced in the grant funding requirements.

Livestock

There needs to be complementarity between woodland and agricultural funding options regarding livestock (and especially sheep) grazing. It is often the case that there is extensive stock grazing within native woodland remnants that occur on crofting common grazings. Support through FGS to control deer would not be effective in securing natural regeneration, because of livestock impacts. FGS objectives would therefore be undermined by agricultural subsidies. This anomaly and potential conflict needs to be addressed through a requirement to create and maintain a herbivore management plan for grant-supported projects, as described in our answer to Q16.

Finally, as discussed under Q7 below, there is a key role for good quality advice on farming and nature being available to farmers and crofters to ensure that the best value for money is obtained from grant-support woodland projects and that existing open land of high value for nature is not lost to tree planting.

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 closely related and intertwined. The support package for forests and woodlands can therefore best 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. Native woodlands and diverse productive woodlands provide the best blend of these benefits. While we acknowledge the potential of well managed commercial forestry to make an important contribution, there is less value for grant money spent in supporting what is already a profitable business model.

Some of our answers below make specific recommendations on how the FGS can address this twin challenge to respond to climate change and nature loss:

- Question 5 - making natural colonisation a more accessible option for woodland expansion by assessing the success of natural colonisation at 15 years rather than the current five years to increase confidence.

- Question 6 - offering a Resilience Supplement for commercial forestry proposals based on a more diverse species mix than required by UKFS.
- Question 15 - offer a nature supplement when natural colonisation is targeted at buffering ancient woodland.
- Question 15 - provide a sliding scale of support which makes the highest payments for proposals that will provide the greatest benefits for nature and biodiversity.
- Question 15 - support riparian woodland creation.
- Question 16 - transfer a significant portion of the FGS fencing budget into deer management under competent herbivore management plans.
- Question 16 - place deer fencing in a supporting role to deer management, with clear criteria for when fencing should be used as a management tool as we transition to lower deer populations.

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 there is a significant opportunity for FGS to combine private and governmental financing to promote more ecologically coherent woodlands, which we must not pass up. Currently, small-scale planting efforts do not have the size required for private finance to be practicable. To scale up projects, we need to use the already-established governmental frameworks provided by the Land Use Partnerships/Frameworks and opportunity mapping developed for Nature Networks that NPF4 mandates Planning Authorities to create. This would provide both the scale and the coordination required to meaningfully tackle the nature and climate emergencies. Include wording re agreed definitions of NBS standards - value of this in responding to the climate crisis.

We also 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 of these imperatives and which are not necessarily based on creating saleable timber assets. By focusing on projects that meet international guidelines such as Nature Based Solutions Initiative at COP 26 and the IUCN World Conservation Congress Hawaii 2016, the FGS would help to enable carbon sequestration through woodlands that also supports the restoration of nature. These guidelines stress the need to 'provide net biodiversity benefit' and following them through would allow the FGS help to create a better balance in the economic stimuli for native woodland and commercially viable forestry.

From our experience in policy planning, we have learned that developers and investors rarely adhere to "shoulds", such as: "Investment and management decisions "should" demonstrate consideration of positive and negative impacts across all four capitals." If new legislation is required, the Government must act quickly to enact it. As many have warned, we must take prompt action to prevent a possible "wild west" for new private finance schemes.

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.:

Our answers to questions 15 and 16 are also directly relevant here:

- Question 15 - offer a nature supplement when natural colonisation is targeted at buffering ancient woodland.
- Question 15 - provide a sliding scale of support which makes the highest payments for proposals that will provide the greatest benefits for nature and biodiversity.
- Question 15 - support riparian woodland creation.
- Question 16 - transfer a significant portion of the FGS fencing budget into deer management under competent herbivore management plans.
- Question 16 - place deer fencing in a supporting role to deer management, with clear criteria for when fencing should be used as a management tool as we transition to lower deer populations. expansion - target native woodland expansion at buffering ancient woodland, linking up native woodland fragments through natural colonisation where possible.

Better management

A review of the current grant structure shows that of the approximately £274m approved grant assistance since the start of the current FGS, £232m went to woodland creation and, especially, commercial afforestation. There is a clear need for both woodland expansion and management of existing woodland to meet Scottish government net-zero and biodiversity ambitions. However it is perverse that new woodland and commercial forestry can be created when our existing woodland, which is a vital carbon store and is key to underpinning biodiversity, is not being managed, even when the new woodland and existing woodland are in the same ownership. We need to first ensure that we restore and secure existing woodland. Many of our recognised ancient woodlands are in ongoing decline, including Scotland's rainforest, Caledonian Pinewood Inventory (CPI) sites, mountain woodlands, wood pasture and Plantations on Ancient Woodland Sites (PAWS) and these are of particular importance for climate and biodiversity.

The grant package can be designed so that alongside woodland expansion, woodland management is also secured where the woodland is on the same landholding. This can be identified through the land management plans proposed under the Land Reform Bill Consultation. Landholdings with ancient woodlands must demonstrate that these woodlands are in positive management before additional forest or woodland creation is supported through the FGS.

The main difference for native woodland management would be the reduction of deer impacts, and in parts of Scotland, such as Scotland's rainforest, eradicating *Rhododendron ponticum* by operating at landscape scale, tackling the whole population within a catchment to prevent re-invasion. We cover these in more detail in the answers to section 5.

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, trees affected by pests, diseases, and abiotic factors such as drought, windthrow and wildfire (all of which are being exacerbated by climate change), provide reduced public benefits. 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 (genetic variability, species, age, structure and silvicultural system) for better resilience. Existing woodlands should be managed to become more resilient over time.

Grant-supported projects should encourage and stimulate proposals that go above the basic UKFS requirements. We propose that a 'resilience supplement' is included within all options for woodland expansion and management. This should ensure that all grant-supported forestry has greater species diversity than the draft new UKFS suggestion of a maximum for any single species at 65%.

For example, this 'resilience supplement' could be offered for schemes that propose less than 50% of any single species in the mix, a maximum size or proportion of a single species block and a minimum number of species included overall.

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?:

We support all of these measures to reduce barriers to agricultural options, particularly the provision of advice through a well funded advisory service, with knowledge of the schemes and how to adapt these schemes to support trees on farms projects at all scales. As noted in our response to Q5 this advice should include clear guidance on avoiding tree planting on open habitats of high biodiversity value such as species-rich grasslands, including machair in crofted landscapes and peatlands to ensure that these important habitats are not lost.

In the case of agroforestry, resources should be developed to inform farmers on how such systems enable food production as opposed to "sacrificing" farmland to trees. In general, there needs to be support for integrated approaches rather than just planting patches of trees on farms. That is why the schemes should sit where they are most likely to be accessed by farmers: we recommend that silvo-arable and silvo-pastoral options, hedgerows, copses and buffer strips, including riparian buffer strips are options available through Tier 2 and Tier 3 agricultural payments. Small farm-scale woodland creation should sit within Tier 4 and be managed by Scottish Forestry. The area threshold to qualify for this support should be decided in discussion with farming and environmental interests. We recommend that this discussion considers the pros and cons of setting the minimum area for this support at different levels between, say, 0.25 and 2 hectares.

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.:

The FGS application process is onerous for small schemes. Most individuals are unable to apply without the help of a professional forestry agent. Preparing a proposal for a small scheme can require almost as much input as for a larger scheme, thus agent costs for small schemes are disproportionately high. The introduction of a modest 'planning grant' for small schemes (say 0.25-5ha) would help to overcome this barrier. Alternatively, for small schemes, individuals could be empowered to make their own applications. This could include a one form, one guidance-document application, a reduced burden of supporting evidence, and access to low-cost mapping as part of helping ensure that valuable open habitats are not lost to afforestation.

We also recommend that applying to the scheme is simplified, at least for farmers and crofters by ending the need to submit separate applications for woodland creation and woodland improvement options. In addition, planting mixed woodland involves more bureaucracy than planting monoculture. This needs to be addressed to promote biodiversity-rich woodland on farms.

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.:

The drivers for increasing woodlands in urban areas are a subset of the drivers for greenspace in general. We recommend that consideration is given to a fund focused on urban greenspace which integrates woodland creation and management alongside other, open forms of greenspace and which goes beyond the 'remit' of the FGS. This would include access to non-forestry budgets, and seek to integrate with sources of preventative spend for health and wellbeing. We suggest that this could create scope for blending such a fund with grant sources such as Lottery funding and even future forms of natural capital. As ever with urban spaces, capacity for meaningful community involvement is critical.

Woodlands close to where people live are often important places for the communities to enjoy leisure and recreation activities as well as being used as settings for educational activities, such as forest schools. All land managers have a statutory duty to respect access rights under s.3 of the Land Reform (Scotland) Act 2003, so we would expect a recognition of public access as an element of any plans for woodland creation or replanting projects. Access in woodlands in these areas should be referenced in a forestry grant application by the production of an accompanying access statement or map. This map could identify main routes and paths within the woodland, both formal and informal, as well as the location of other infrastructure, such as car parks,

signage, gates, etc. If any routes will be affected during forestry operations, this should also be considered, through zoning of the work and potential creation of alternative routes, possibly on a temporary basis, to facilitate safe access as far as possible. This access statement/map would ensure that public access is considered strategically and even enhanced where possible, perhaps by the development of trails suitable for all abilities to ensure that access is as inclusive as possible. The use of self-closing gates rather than stiles on main paths should be a requirement of the grant process.

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.:

As mentioned in Q9 above, LINK believes it would be beneficial if all forestry grant plans include a basic assessment of what public access already exists or will be affected, by production of an accompanying map of main tracks and routes, fences, gates, stiles. This would help forest managers to be aware of their legal obligations to respect public access.

Forests and woodlands which have multiple objectives (ie, woodlands already used for recreation and community activities, or where there is potential for that to happen) an access management plan which includes the above but also car parking spaces, signage, etc, could be provided for a more strategic overview of how communities can access and enjoy the woodlands.

Even in forests and woodlands where there is unlikely to be high levels of use by the public, a consideration of public access would identify key routes for passage. In this case, self-closing gates could be installed alongside any gates on the main tracks. Too often, forestry gates are locked for other reasons (eg, to prevent motorised vehicles entering the woodland, or to ensure deer do not get through gates which have been left open). However, this acts as a block on access for most people. Even if an adjacent stile is installed this will be a barrier for cyclists, horseriders, dogs and many walkers and therefore putting in a self-closing gate should be seen as standard practice. Grant-supported forest roads and tracks should conform to industry standards, including NatureScot's Guidance on Upland track Construction for lighter touch installations.

We also support the existing grant option for small scale harvesting and processing to enable the establishment of local firewood or sawmilling enterprises and would like to see support for niche products and services such as building a foraging or Forest Schools business.

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.:

Recent research (such as this report) has shown that community engagement in large commercial forestry schemes has been below standard in too many cases. This should be addressed in the FGS Review by:

- Requiring proposals to meet community engagement standards. This report to the LINK Woodland Group on the UKFS could provide a strong starting point for developing these standards;
- Information on schemes, including all supporting data should be readily accessible online, as per the planning system, via a user-friendly website;
- Grant assessments for woodland creation should take into account the cumulative impact of schemes according to clear, published criteria.

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 current system for grant assessment and award is opaque. It is difficult to access information on the detail of proposals and how they are assessed, which compares unfavourably with the development planning system.

We recommend considering the following:

- The criteria for assessing grant applications are published;
- Clear criteria for assessing the cumulative impact of schemes in an area are developed and published - this has become an urgent need in parts of the country where commercial forestry has expanded rapidly to profoundly change local landscapes;
- Information on forestry and woodland proposals is published in an accessible format and language on a user-friendly website, including full disclosure of data.

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?:

This has worked well and been essential for new enterprises where sound business planning is in place and the relevant skills are available. We would like to see more emphasis on land-based enterprise support where the business activity can demonstrate a sensitive approach to nature and create nature-positive habitat in productive woodlands.

Alternative silviculture models, particularly continuous cover forestry, can be applied 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. While access to training in these silvicultural techniques is an essential part of increasing the prevalence of this beneficial forestry model in Scotland, so is purchasing the equipment needed to process timber and craft saleable, high value products from the material. Maintaining, and looking to optimise or increase such support is key to efforts to move more of our forestry into this more sustainable and impactful approach.

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

Apprenticeships focused on Continuous Cover Forestry techniques and on adding value to timber and non-timber forest products through different forms of craftsmanship could all support this intention.

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.:

There may be value in demonstrating the range of green jobs available in forestry through outreach activity carried out in collaboration with other government organisations such as Scottish Enterprise and HIE.

In requiring grant-supported projects to clearly demonstrate that they will not damage existing open habitats, and that existing ancient woodlands on a property are in appropriate positive management, the FGS would be directly increasing the demand for training in ecological survey and implementing nature-positive forestry, silvicultural approaches such as CCF and woodland management for nature.

The necessity to manage deer for environmental and community benefits means there will be a demand for skills and capacity in deer management beyond what is currently available. This demand is likely to be sustained in time because as habitats recover, conditions for deer will improve and the need for sustained deer management will increase in order to maintain biodiversity gains.

There are four ways to increase deer culls: A) encourage and compel those already culling deer to cull more; B) widen access to deer stalking through training more people; C) opening access to land for more people to stalk; D) a combination of all of the above.

The FGS could facilitate the development of B) and C). It could attach conditions to grants that favour open access to land for trained stalkers to cull and sell the venison and it could also finance the training of new deer stalkers using savings made by prioritising natural regeneration and colonisation grants over more expensive planting and fencing options.

This financing would be part of the grant, with applicants being responsible for selecting training courses from a Scottish Forestry or NatureScot approved list.

The training program would consist of modules including the existing gamekeeping qualifications and courses provided by recreational hunting organisations as well as new topics such as ecology, carbon management, land use and community benefits.

Part of the training funding would aim to train new professional stalkers, while another part would be available for the local community to acquire training for recreational purposes. The community stalkers would then be able to assist or lead deer culls, therefore increasing capacity and democratising land management.

As a complement to increased stalking by an enlarged stalking community, the FGS could also help to build long term sustainability for hunting operations by increasing support for training in venison processing skills in small local facilities, including new deer larders. This can support shorter supply chains that end in local markets so that a greater share of national revenue from venison sales stays in local communities.

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.:

Based on the NWSS we know that herbivore damage, Rhododendron ponticum and other INNS are the biggest threats to the condition of native woodlands. Afforestation of important open habitats can drive further losses in biodiversity. We cover deer damage in the answer to question 16 below, and we will cover the issues of open habitats, rhododendron ponticum and grey squirrel in our answer to this question.

Increasing native woodland cover in Scotland to 7% by 2030 and 10% by 2045 would make a major contribution to addressing the twinned nature and climate emergencies. We therefore believe that grants for woodland creation should provide a sliding scale of support which makes the highest payments for proposals that will provide the greatest benefits for nature and biodiversity and which generate little or no financial income. This could operate in three parts:

1. Nature benefit/commercial value - with the highest payments for montane woodlands and decreasing through a sliding scale from high payments for native woodlands, through native and mixed woodlands that will provide blends of biodiversity, amenity and financial value, down to the lowest payments for non-native commercial woodland planted in suitable locations.
2. Establishment method - new native woodland established by natural colonisation should receive higher payments than planted woodlands.
3. Strategic location - offer a Nature Supplement for natural colonisation which aims to expand from ancient woodland and support for riparian woodland as outlined below.

Mountain Woodlands

Mountain woodlands, growing above the timber line up to the natural scrubline where grazing pressures permit, are of very high value for biodiversity, natural flood management and maintaining lower ground temperatures even as the climate changes. Restoring and expanding these woodlands is practically challenging and worth supporting through some specific measures in the FGS:

- Support for the higher costs of pre-project survey, specialist nursery propagation, planting and monitoring in high altitude locations.
- A more flexible and realistic (for the alpine conditions) minimum stocking density per ha.
- Increasing the % of native woody shrubs allowable in woodland and scrub at higher altitudes up to 100% for montane willow scrub.
- Decreasing the minimum block size to 0.05 ha, but also increasing the maximum area where this can be used as a stand-alone option.

Riparian buffer zones and securing the benefits of beavers

Beavers have been reintroduced to Scotland and “The Scottish Government will actively support the expansion of the beaver population”^[i]. With beavers actively engineering aspects of their environment there will be instances of conflict with other land-use interests, particularly arable agriculture, which has, in many cases, led to the lethal control of these animals.

[i] <https://www.gov.scot/news/protecting-scotlands-beaver-population/>

[ii] <https://www.gov.uk/guidance/beavers-how-to-manage-them-and-when-you-need-a-licence>

Invasive Non-Native Species

Rhododendron

Rhododendron ponticum is a particular issue on the west coast of Scotland, within Scotland's rainforest sites, but other areas are also affected.

Rhododendron ponticum suppresses lichens and bryophytes, as well as the native trees which support these in the rainforest zone. It can only be cleared effectively at population level through ensuring the cleared area can be defended after clearance to prevent reinvasion.

- Grants need to work at population level - this means that mechanisms need to be in place to deliver beyond woodland edge into non-woodland habitat in some cases and they need to encourage collaboration between landowners and communities and encourage strategic landscape scale management plans.
- Funding needs to be available for determining the spread of rhododendron in the area to be controlled.
- The future grant needs to recognise that Rhododendron ponticum eradication needs to be done in phases over long-term. Regular monitoring is essential to ensure that public money is well spent and the desired outcome is achieved so we propose that the grant mechanism includes a requirement to do a follow up survey at year three after the initial clearance. Based on this survey additional funding applications can be made for follow up treatment phases.
- Grants need to be supported by a strategy for Scotland, or at least the rainforest zone-scale with the following elements: direction on rhododendron management from Scottish government; built in legacy for projects to prevent re-invasion so commitment to long term management, monitoring and funding; a clear and robust process for the use of regulatory powers (SCOs and SCAs) by statutory agencies and statutory agencies beginning to exercise those powers. This can ensure that current public spending is better targeted and it achieves better outcomes.

Other INNS

Other INNS are increasing threats to native woodlands, not least in the rainforest zone, and open habitats such as blanket bogs and upland heathland including in particular non-native coniferous regeneration seeding outwards from commercial plantations. In instances where sitka spruce and other non-native conifers are becoming invasive, the current WIG option to clear such regeneration should continue with a more flexible grant for the removal of coniferous regeneration on both native woodland and open habitats of conservation interest. This should be available on any BAP priority habitat, be proportional to the actual costs of removal (which vary from £160/ha up to £900/ha) and include allowance for follow-up payments to deliver the necessary clearance of reseeded trees.

In addition, for both long-term resilience and cost saving purposes, preventative approaches should be taken in forest design through guidance and regulation. For example buffer zones can be specified to avoid seeding into native woodland, Scotland's Rainforest and other habitats. The buffer zones can be decided on a case by case basis and these may need to be up to 500m. Invasive Sitka spruce should ideally be removed whilst still young to minimise damage to native habitat.

Grey squirrels

It is not only invasive non-native plants that threaten Scotland's forests and woodlands. The invasive non-native grey squirrel critically damages young broadleaved trees through bark-stripping. In England, where grey squirrels exist in higher densities, bark-stripping costs the forestry sector £31 million annually. The grey squirrel is also driving the extinction of our iconic native red squirrel (*S. vulgaris*). To date, the grey squirrel control portion of FGS has been a crucial supporting component of the national grey squirrel control effort. The following are recommendations for updates to the current system:-

- The capacity to provide the ecological and technical expertise needed to support and advise FGS-funded grey squirrel control should be embedded within Scottish Forestry's operations.
- Efficacy of FGS trapping could be improved if estate representatives were required to undertake standardised training.
- The minimum trapping effort and the schedule of trapping required on an estate should be site specific and agreed upon during a preliminary site visit according to grey squirrel professional advice and reviewed on an ongoing basis.
- Estates should be required to follow the SSRS Standard Operating Procedures, or comparable standards, for trapping.
- Regular monitoring of estates' trapping success and adherence to professional recommendations of better practice should be a requirement for receiving FGS funding.
- Improvements should be made to the system for the submission and processing of landowner trapping returns. E.g. digitisation of the system
- Scottish Forestry should assess how FGS grey squirrel control funding can be allocated more optimally within the Scheme, with consideration to the expense associated with the technical support and professional input required for its effective delivery.

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?:

Better deer management across Scotland would result in reduced impacts on existing woodlands and would enable natural colonisation on a greater scale. Deer management is a priority area for Scottish Environment LINK because it would deliver for a range of nature recovery objectives in Scotland as well as for the policies set in the Climate Change Plan. These key areas are peatland restoration, forestry, native woodland management and expansion, delivered at landscape-scale. Supporting the protection and restoration of woodlands identified by the Native Woodland Survey of Scotland are important

priority aims for the FGS. Below we set out how we see the current funding package can evolve to stimulate woodland expansion and better outcomes across a wide range of woodland types, including native and productive woodlands.

All FGS applicants should submit a competent Herbivore Management Plan which outlines the known herbivore species, densities and issues across both the applicant's ground and neighbouring ground. Plans should consider the practicalities of implementing deer and livestock management to deliver and maintain herbivore impact levels over the long term that will achieve the nature restoration goals set for each grant-supported project. While deer and livestock densities can be useful data, herbivore impact levels are a key metric and should be assessed using methods approved by NatureScot, such as the Woodland Herbivore Impact Assessment method.

Competent Herbivore Management Plans should also include:

- Details of basic deer management infrastructure to support future culling operations such as access tracks to all corners, open deer glades or culling areas;
- A description of how applicants will work with relevant neighbours to reduce deer numbers at landscape scale;
- An awareness that deer densities of 0-5 deer/km² are likely to be necessary to allow woodland habitats to sustainably expand and support biodiversity;
- Consideration of how browsing pressure from livestock in the landscape will be addressed alongside deer pressure;
- A commitment to five yearly reviews in the light of Herbivore Impact Assessment and other data.
- Compliance with the Code of Sustainable Deer Management.

The point on working with relevant neighbours to deliver deer management is an important facet of ensuring that grant money for deer management is spent effectively. As the existing FGS scheme recognises in its criteria for supporting landscape-scale deer management, this requires to be more detailed than a Deer Management Group plan. We recommend that these criteria be reviewed with deer management, forestry and conservation organisations to best encourage effective working between different landholdings in a given landscape to achieve objectives for woodland condition and expansion through natural regeneration. Regional Land Use Partnerships and Nature Network plans may have an important role to play in setting such objectives. Grants for deer fencing should be used judiciously, in a supporting role to landscape-scale deer management. Payments for fencing to support woodland creation should remain available to play a supporting role as we transition to a landscape with significantly lower browsing pressure from deer. Fencing is not a sustainable solution to habitat restoration but can be an appropriate tool if applied judiciously. With this in mind, grant payments for deer fencing should only be available to support woodland creation or management in specific circumstances:

- Protecting small remnants of native woodland where priority for restoration is denoted by:
 - o designation as a SSSI or SAC;
 - o inclusion on the Caledonian Pinewood Inventory or the Ancient Woodland Inventory;
 - o native montane woodlands.
- Repairs to existing fences protecting any of the above categories of woodland should be funded where extending the lifespan of the fence has a realistic prospect of completing previous progress made towards woodland establishment.
- Fences to facilitate landscape-scale deer management, where the value of this is supported by a clear rationale and endorsed by NatureScot.
- We recommend that consideration is given to assessing the role that offset electric wires in front of stock fences could play in some situations and that this is eligible for grant support where suitable.

In the more limited circumstances where deer fencing is used, the accompanying Herbivore Management Plan should include a section describing how the fence will be monitored and maintained over its lifespan and a clear plan for how the biodiversity value of the new woodland will be maintained after the end of that lifespan.

Small scale mixed land use?:

- This will require support for smaller-scale collaboration between land managers so that deer populations, of all species, can be managed in a coordinated manner.
- Support for the use of technology to inform more effective deer management, such as drone surveys and thermal imaging, can provide a significant boost to both impact and coordination.
- Grant support for fencing and maintenance in important woodland schemes may be necessary in some lowland environments. This might apply for instance to proposals to improve the resilience of designated and ancient woodland sites through expansion.

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

Please add your comments here.:

Expansion of our trees and woodlands must be accompanied by appropriate protection of the historic environment

Woodland creation has the potential to impact on the historic environment, here meant in its broadest sense, including archaeological sites, cultural landscapes (for example, designed landscapes and old working landscapes), the structures and settings of historic buildings and ancient monuments, battlefield sites and other less tangible historic sites, and even bio-archaeology such as old culturally-modified trees and historic woodlands. There is more overlap between the cultural and natural heritage worlds than is commonly recognised. Greater dialogue and collaboration between the natural heritage, cultural heritage and forestry sectors should be encouraged in further developing and deploying best practice in protecting the Historic Environment and in ensuring that relevant protection measures and mitigation processes are sufficiently robust and are being followed. It should be remembered that only a minority of our historic features are designated and that many of the components of our Historic Environment have yet to be identified or recorded, so there will often be a need for new survey and other professional work in addressing potential impacts on the Historic Environment.

Our final comment is that it is critical that Scottish Forestry receives the investment it needs to be adequately staffed and resourced to administer the FGS, monitor its outputs, require compliance with conditions where needed to ensure value for money and learn from experience in producing good quality outcomes.

About you

What is your name?

Name:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Scottish Environment LINK Woodland Group,

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

Publish response with 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