

Response to the 2nd Consultation on the Scottish Forestry Strategy 2006

Instructions for filling the form out electronically:

Where a yes/no or multiple choice question is asked on this form:

- Decide on your response
- Click on the box relevant to your response – the cursor will appear
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Personal details table:

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Once you have finished the form, save it and then send it attached to an email to us at: fcscotland@forestry.gsi.gov.uk. Please return it no later than **Monday 29th May**, and earlier if at all possible.

If filling out the form by hand:

Print out the form, complete it and send it to: Forestry Commission Scotland, 231 Corstorphine Road, Edinburgh EH12 7AT. Please return it no later than **Monday 29th May**, and earlier if at all possible.

Respondent Information

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The Scottish Council for National Parks [SCNP] was formed originally in 1943 and operated until 1967, when it was stood down as a result of the setting up of the Countryside Commission for Scotland [CCS]. It was reconstituted in 1990 following the publication of the CCS's report on the 'Mountain Areas of Scotland' for Government, which recommended the creation of National Parks in Scotland. The SCNP's primary aim is to promote the protection, enhancement and enjoyment of nationally outstanding areas that are National Parks, or are appropriate to be designated as such, or are of sufficient merit to warrant special protection. This is manifest in our support for good stewardship of the country's best environmental assets and encouragement of sustainable methods of development, particularly within areas of national park potential. The SCNP is a recognized Scottish Charity.

The SCNP is glad to have the opportunity to comment on the Forestry Commission's important consultation paper about the draft Scottish Forestry Strategy 2006.

1. Are you responding: (please place a cross in one box only)

a) as an individual please go to Q2a/b and then Q4

b) on behalf of a group/organisation

please go to Q3 and then Q4

Individuals

2a Do you agree to your response being made available to the public? (at Forestry Commission Scotland, 231 Corstorphine Road and their website)

YES (go to 2b below)

NO, not at all (*We will treat your response as confidential*)

2b Where confidentiality is not requested, we will make your response available to the public on the following basis (please cross **one** of the following boxes)

YES, make my response, name and address all available

YES, make my response available, but not my name or address

YES, make my response and name available but not my address

On behalf of Groups or Organisations

3. **The name and address of your organisation will be made available to the public** (at Forestry Commission Scotland, 231 Corstorphine Road and their website). **Are you also content for your response to be made available?**

YES

NO (*We will treat your response as confidential*)

Sharing Responses/Future Engagement

4. **Are you content for Forestry Commission Scotland, or others in the Scottish Executive to contact you again in the future about your consultation response?**

YES

NO

Please note that Forestry Commission Scotland is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 and would, therefore, have to consider any request made to it under the Act or the Regulations for information relating to responses made to this document.

Questions

1. Draft Scottish Forestry Strategy

We would like to know what you think about the draft Strategy. We don't want to miss anything, so please help us by giving your comments under two headings:

a) General comments

1. SCNP is impressed by the holistic approach taken by the Strategy, by its comprehensive detail and by its commitment to seeking a reasonable balance between the various elements of the Strategy.
2. We note the considerable emphasis placed upon partnership working and the involvement of communities. Most community organisations are staffed by volunteers, many of whom are retired people of increasing longevity – a widespread concern is that their capabilities are being swamped by the volume of consultations emanating from government, government agencies and local authorities. For community bodies to be effective in the delivery of good

outcomes, we believe they require more support either in the form of funds to acquire professional assistance or in the provision of seconded staff from appropriate organisations. Hence, we welcome partnership working in principle, but we are aware that this approach can be very time consuming and can produce uncertain results.

3. The previous point leads us to question whether the forestry sector has sufficient resources to deliver all the actions within the time scales proposed in the draft strategy. There might be a heavy burden upon Forestry Commission Scotland [FCS] to plug any developing shortfalls?
4. We support the principle of an integrated approach to issues and ‘joined up thinking’ that is manifest in the strategy. But there appear to be about 100 headline actions proposed that will require underpinning by further detailed procedures and we wonder how these will be prioritised within resources available [presumably scarce]. Is there a danger that the inclusion of some of the other Scottish Executive objectives may distract attention from key priorities for the forestry sector?
5. How will any conflicts between the strategy’s actions be resolved in practice? We would commend the general use of the ‘Sandford Principle’.
6. We have a particular interest in the protection and enhancement of landscape quality, especially in National Parks, NSAs and other important scenic areas. We would like to see more emphasis given to the use of proven forest landscape design techniques and to sustained training of forestry staff in these skills.

b) **Detailed comments** (please tell us the **page** and **paragraph** number{s} each comment refers to)

e.g. Page 12 Para 1.4.5
More emphasis should be given to

As many issues are repeated in ‘*What needs to be done*’ in each Key Theme, SCNP has focussed its response on these sections of the draft strategy.

Key Theme 1: Climate Change

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 30 Para 2.4.5 3rd bullet *Mitigation*

FCS should lead by example [if it doesn’t already do so] in the use of bio-fuels for all its powered equipment and vehicles

Page 31 Para 2.4.5 6th bullet *Mitigation*

FCS and its associated agencies should use their liaisons with kit builders about the use of ‘timber product specifications’ to encourage the development of a range of

vernacular design options that would enable kit houses [one of the key ingredient for affordable housing] to fit better into their rural or woodland settings. Architecture+Design Scotland could be a useful ally for such a project.

The draft Scotland's National Transport Strategy seeks innovation in measures to promote new technologies to mitigate effects of climate change. Perhaps FCS might explore opportunities for the greater use of timber products in vehicle construction to reduce the use of energy intensive metals – vide the Morgan Motor Company, Worcestershire that still uses ash bodywork frames. Laminated timber technology might increase the scope for using wood in vehicle construction.

Key Theme 2: Business Development

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 32 Para 2.5.2 8th, 10th bullets *Woodlands can accommodate new business premises, affordable housing etc*

The conversion of woodland, especially in sensitive areas like National Parks, NSAs etc, to industrial and housing uses needs very careful consideration and must be guided by local development plan policies. In general, we believe it would be prudent to be guided by a presumption of *no development* in woodland located in sensitive areas.

There may also be conflicts with the proposals for soil protection [Page 40 Para 2.9.4]

Page 33 Para 2.5.3 9th bullet *Support research and training to improve the understanding and delivery of visitor needs*

Much of the work undertaken by psychologist Professor Terence Lee for FC in the 1980s should still be relevant to this proposal. Also later landscape preference work.

Page 33 Para 2.5.3 10th bullet *Woodland owners capture of tourism revenues etc*

This would be helpful if a suitable mechanism could be devised and the resulting revenues equitably distributed to woodland owners. Perhaps an appropriate surcharge levied by tourism facilities, which depend on wooded landscapes for their ambience, activities and marketing, may be worth considering?

Key Theme 3: Community Development

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 34 Para 2.6.1 3rd bullet *Shift forestry's culture from doing things 'for' to 'with' communities*

As this could be difficult for the private sector, presumably most of the onus for this action will fall upon FCS?

Page 35 Para 2.6.3 2nd bullet *Community participation in forestry etc*

Please see our general comment 2).

Page 35 Para 2.6.3 7th bullet *Affordable housing etc*

Please see our response to Page 32 Para 2.5.2 8th, 10th bullets. Can conditions of sale be imposed that would facilitate the creation of well designed developments in both landscape and architectural terms e.g. a development brief [produced in conjunction

with the local planning authority] that respects the woodland setting and its biodiversity as well as the vernacular architecture of the area? This might be easier to achieve with FCS than the private sector, hence the balance of provision of sites for affordable housing as between FCS and the private sector needs to be carefully assessed? [NB: there are also social effects to consider e.g. is a 'monoculture' of affordable housing desirable for good community relationships?]

Key Theme 4: Learning and Skills

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 15 Para 1.4.22 *Integrating forestry skills with agricultural work etc*

We believe that this is an important idea that could facilitate year round stable employment. Many of the skills of forestry workers are interchangeable with agricultural work with the exception of general tractor driving and stock husbandry. However, the converse may not be true for agricultural workers, where perhaps the main training inputs should be focussed?

Page 37 Para 2.7.5 8th bullet *Continuing Professional Development[CPD]*

It is important that forestry staff [FCS and private sector] acquire and retain a good understanding of the principles and techniques of forest landscape design. This is needed for those staff who do not possess computer aided design software and will also enable those that do to exercise a critical assessment of computer generated forest designs.

Page 37 Para 2.7.9 *Other Indicators*

From SCNP's perspective, it would be useful to have an indicator that reflected CPD achievements and work based learning in the elements of the forestry strategy, especially those of landscape, biodiversity and access

Key Theme 5: Access and Inclusion

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 38 Para 2.8.3 6th bullet *Inclusive access etc*

The development of an 'off road' wheel chair, based on bicycle/tricycle principles with gearing, could greatly increase safe access to forest tracks for wheel chair users [Page 21 Para 1.4.60].

Page 39 Para 2.8.3 8th bullet *Core path networks*

We welcome the provision of additional financial incentives to improve opportunities for recreation and access provision across land ownership boundaries [Page 21 Para 1.4.59]. This should facilitate the development of core path networks and the extension of long distance walking routes initiated by the former Countryside Commission for Scotland.

Page 39 Para 2.8.3 10th bullet *Encourage use of woodlands for living heritage etc*

The heritage of introduced species by the Scottish plant collectors should not be overlooked e.g. David Douglas et al. There are many magnificent stands of original introductions that are worthy of display and interpretation.

Page 39 Para 2.8.7 *Targets etc*

The longer term target of ‘*three quarters of the population living within 500 metres of accessible woodland greater than 2 ha....*’ seems over ambitious given the uncertainties of delivery with partnership working and possible limited resources.

Key Theme 6: Environmental Protection

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 40 Para 2.9.6 *Landscape*

The implications for forestry of the UK’s recent signing of the European Landscape Convention do not appear to have been addressed.

Page 41 Para 2.9.7 1st bullet *Waste*

How does the forestry technique of ‘cut to waste’ on uneconomic sites conform with the Executive’s National Waste Plan?

Page 42 Para 2.9.12 3rd bullet *Other indicators*

We welcome the indicator for promoting the extension of forest design plans and forest plans in National Parks etc. By this means we hope that the overall quality of woodlands in these sensitive areas will be enhanced, along with their accessibility for recreation.

Key Theme 7: Biodiversity

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 43 Para 2.10.3 3/5 bullets *Landscape and Ecosystems/deer management*

Where deer fences have to be used, their alignments to reflect landforms rather than geometric boundaries, should reduce their visual impacts.

Page 44 Para 2.10.3 4/5 bullets *Knowledge/planning authorities*

There should be a ‘presumption of no development’ not only in woodlands of high biodiversity value, but also in those of high visual, recreation and quality of life values.

Page 44 Para 2.10.5 4th bullet *Open-ground habitat restoration*

What restorative treatment is proposed for those types of peat that cannot re-absorb water after drying out due to forestry ploughing and drainage operations?

Restorative techniques to open ground conditions e.g. elimination of ploughing, draining and road scars and recreation of open ground vegetation would require to be comprehensive, especially in sensitive areas. They are also likely to be very expensive.

Key Theme 8: Timber

In general, we support the analysis and proposals in this theme, but offer the following specific comments.

Page 45 Para 2.11.2 5th bullet/Page 46 Para 2.11.3 4th bullet *Uneconomic forestry sites*

It is not clear what a ‘radical reappraisal’ of the objectives for uneconomic sites entails [Para 2.11.3]? A longstanding FC objective was to support communities in areas of fragile economic viability by the creation of new woodlands and their

subsequent management. As the present strategy still seeks to support communities, is there a non sequitur in apparently now seeking to withdraw forestry from difficult areas?

What does ‘conventional replanting for timber production is likely to be uneconomic’ mean [Para 2.11.2]? Does it imply not replanting at all? If so, then the restorative techniques to open ground conditions e.g. elimination of ploughing, draining and road scars would require to be comprehensive, especially in sensitive areas. They are also likely to be very expensive.

Moreover, ‘cutting to waste’ [if this is a technique proposed] is very unsightly and should not be acceptable within National Parks, NSAs etc; it also would appear not to conform with the Executive’s National Waste Plan.

Delivery: the National Forest Estate

Page 48 Para 3.5.4 8th bullet *Timber production*

Prima facie it would appear more viable for the private forest sector to focus on the more productive sites than FCS. There would appear to be a dilemma between FCS support for communities, especially in fragile areas and the need also for FCS to obtain significant revenues from timber production on productive sites. The strategy does not make clear how this difficulty is to be resolved? [See also our comments at Page 46 Para 2.11.3 4th bullet]

Delivery: Grants and external funding

Page 50 Para 3.6.6

In principle, we welcome the concept of Land Management Contracts [LMCs] providing an integrated, single gateway to land management funding. However, we are not clear whether the revision of the Scottish Forestry Grant Scheme [SFGS] means its demise and full integration within LMCs? If this is the case and LMCs are administered by SEERAD, we have some concerns about whether SEERAD staff have the competencies to assess the requirements of the UK Forestry Standards that are demanded by the SFGS.

Page 50 Paras 3.6.9 – 3.6.12

Raising funds from sources other than specific grants for forestry and land management purposes is complex, very time consuming and competitive. There is no certainty of a successful outcome for community bodies/partners engaged in this process. Hence, it is important to recognise that effective delivery outcomes by community bodies are likely to be slow and uncertain; in turn these will reflect upon the various targets set. [This reflects our varied experience in working within community bodies and is not intended to be critical of their efforts.]

2. Environmental Report

We would like to know what you think about the Environmental Report on the draft Scottish Forestry Strategy. We don't want to miss anything, so please help us by giving your comments under two headings:

a) General comments

1. It is reassuring that the SEA consultants found that the Strategy ‘will have a largely positive impact.’
2. Based on the ‘Non Technical Summary’, our only caveat is that there appear to be no risk assessments of the Strategy’s capacity to deliver some of the targets e.g. negative scenarios [uncertain delivery by partners/community bodies; limited resources etc] as well as positive scenarios.

b) Detailed comments (please tell us the **page** and **paragraph** number{s} each comment refers to)

e.g. Page 16 Para 3.3.1.1
More/less emphasis should be given to the role of

SCNP has no detailed comments.

Duncan Campbell
On behalf of SCNP
29 May 2006