

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.:

The FGS is well known and operates competently as a separate scheme. While we can see significant benefits from integration with other land support in theory, we would not want to see this lost to a change process that cannot be implemented smoothly due to a lack of resource in the agencies that would be involved.

We would support considering pathways to integration in the long term but given the extent of change in the wider land management picture, we think that this is a middling priority for now.

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.:

Grant applications should be accompanied by management plans which set out how the proposed project will integrate with existing land management activities. These should consider how any opportunities for climate change mitigation, nature restoration and community benefits will be realised.

Livestock

The FGS needs to take account of the potential for livestock grazing supported by agriculture funding to undermine woodland funding objectives – changes in deer management alone will not be sufficient to achieve many of the FGS' aims. FGS-supported projects should therefore be accompanied by a herbivore management plan, as described in our answer to Q16.

Riparian woodlands

Biodiversity, flood management and water quality would all receive a major boost in Scotland with increases in riparian woodland in farmed landscapes. Significantly increasing support for riparian woodland is one of the best value for money investments the FGS can make. We would like to see a grant for riparian woodland creation available to all arable and livestock farmers, with a yearly per hectare payment that fairly reflects losses in crop yield or grazing value from removing the land from productive use. The option should stipulate a minimum buffer width of 10m to deliver positive impacts for the natural environment.

Support for the better integration of trees and woodland in farm management through agroforestry is a priority for nature in farmed landscapes. This support should include access to a high quality farm advisory service to help farmers to plan moves into different forms of agro-forestry.

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 emergency is recognised in international agreements, including the COP26 Glasgow Climate Pact, as being directly associated with the chronic decline in nature. 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 while promoting carbon sequestration. The FGS can play a key role in enabling the management, expansion and creation of native and diverse productive woodlands that provide the most effective combinations of benefits for climate and nature. Well managed commercial forestry also has an important contribution to make, but there is less value for grant money spent in supporting what is already a profitable business model.

Specific grant measures that would help deliver this would include higher levels of funding for woodland expansion through natural regeneration, which is of course closely linked to herbivore management and to deer management in particular. There should also be more incentive to diversify new planted woodlands and to reduce the high proportions of sitka spruce in commercial plantations.

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.:

Yes, but...

Carbon finance is having a hugely distorting impact on the land market in Scotland and too many projects are benefitting from the triple injection of income from commercial timber, carbon finance and an unnecessary pump-priming FGS award. There is a risk that the mix of woodland types in Scotland becomes further imbalanced towards schemes that produce little benefit, or actual damage to nature and community interests.

While native and productive woodlands supporting small forestry-related businesses could deliver a significantly wider set of public benefits at scale by blending natural capital finance with FGS support, care should be taken to ensure that the FGS is focused on these kinds of projects only, as they do not have the benefit of commercial income to become established.

More research is required to enable clear assessment of natural capital gain through improvements in the management of existing woodlands. This may support the development of forestry grants or alternative streams of funding through private investment in natural capital.

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.:

Again, increasing the support for natural regeneration to make up a much greater proportion of the way we expand woodland cover and improve the condition of our existing woodland would offer significant advantages of the current planting-dominated approach. Natural regeneration is cheaper than planting, releases less soil carbon, increases woodland biodiversity, genetic resilience and natural adaptation to local soil conditions. Our answers to questions 15 and 16 deal with this matter in greater detail.

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?:

Of course. We need greater resilience to the increasing changes at play and plans for forests and woodlands should explicitly address these issues through more diverse species mixes and developing age structures. Silvicultural diversity would help with this and we would like to see much greater support for planning and implementing continuous cover forestry methods.

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.:

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.

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 more resilient and biodiversity-rich woodland.

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.

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 that has been compiled with the benefit of community participation. 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.

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.:

In line with the definition of community benefit proposed by the Land Commission, which puts communities at the centre of defining what benefits them, there is clear and strong need for the 'informal' community engagement stage of a new planting application, to be a formal requirement, properly evidenced.

It's widely acknowledged that 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.

Whilst paying attention to the need for 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, and anecdotal evidence suggests that Scottish Forestry is overriding community concerns in this area, citing the need to meet targets. The problem with cumulative impact could be easily addressed by including a check at pre-application stage.

A second area which causes distress to communities, but which could be turned into a community benefit, is that of access. 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.

Support using local development workers / facilitators / trusted intermediaries between companies and communities when developing planting applications. This would need financial support.

Consider including a community impact assessment, or community benefit assessment, in the pre-application stage of development.

Applicants could be asked to demonstrate how woodland expansion will fit with local place plans and community action plans to facilitate CB/CWB.

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.:

Forest Policy Group published a report which provides an evidence base on this question, in December 2022: 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 our 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. We hear too often that SF are perceived by the community to be at one with the forest agent, over-riding community concerns, or at best a 'faceless bureaucrat' or a lack of clear communication.

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 answer to this question is in the text of the question! Referring to the same study, Lawrence and Paterson (2022), we found repeated concerns across communities of place and interest that the forestry application process is out of line with the openness and transparency of the statutory planning process.

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 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. RPID already collects 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. In the same way as the Planning Decision is made.

We do currently see the annual publication of beneficiaries and regular FGS stats and it is critical that this is maintained. This and the points above should be part of a harmonised approach across all public funding for land management. RPID already collects much of the data needed for transparency through the land registration process, all that's needed is enhanced access.

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?:

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 proportion of this forestry model, 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?:

Encourage companies to work together to share and rotate apprentices.

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 may lend itself better to support from the enterprise sector, for instance 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 support should explicitly favour proposals that will provide the greatest benefits for climate change, nature and communities 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 supplement for natural colonisation which aims to expand from ancient woodland and greater support for creating riparian woodlands in farmed landscapes.

Invasive non-native species, especially *Rhododendron ponticum*, are significantly reducing biodiversity. The FGS needs to continue to support the control of INNS but adjust approach to fund long-term, landscape-scale approaches supported by competent strategic planning. The last two decades of FGS experience of this issue have proved that tackling INNS without these attributes in place is a waste of money.

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?:

Effective deer management needs to be competently planned. FGS applicants should therefore include a Herbivore Management Plan which deals with deer, but also any other herbivores in the landscape, including livestock. These plans should consider the practicalities of implementing deer and livestock management in order to deliver and maintain herbivore impact levels over the long term that will achieve the nature restoration goals set for each grant-supported project.

Plans need to describe how applicants will work with relevant neighbours to reduce deer numbers at landscape scale and be regularly reviewed so that they adapt to changing information on herbivore impact levels and distributions.

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.
- Where there is a clear section in the Herbivore Management Plan 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 that lifespan.

Small scale mixed land use?:

Financial support for smaller-scale collaboration between land managers so that deer populations can be managed in a coordinated manner. This should be supplemented with support for technology to inform more effective deer management, such as drone surveys and thermal imaging.

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

Please add your comments here.:

This response replaces the earlier version submitted on behalf of Forest Policy Group earlier today: ANON-VEPG-2GRD-1

About you

What is your name?

Name:

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What is your email address?

Email:

[Redacted]

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Organisation

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Organisation:

Forest Policy Group

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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?

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

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