

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?

Not sure

Please explain your answer in the text box.:

It is difficult to comment on this without knowing what levels of funding will be available. Forestry is currently funded through the Rural Development Budget but from 2025 it appears that support for forestry and other rural development measures will be delivered through the new Scottish Agriculture Bill. This would appear to undermine the correct definition of agriculture which is the cultivation of soils including raising livestock (not trees) and these core functions must remain the central focus of funding under the Agriculture Bill with additional support only where appropriate for integration of woodland and other land uses.

There is concern that by using the agriculture budget for multiple potentially conflicting land uses the vulnerability of agricultural businesses will increase, their ability to produce food will be compromised, and businesses may fail. For this reason large scale forestry development should be funded through private investment or a dedicated forestry development fund, not through agricultural funding.

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.:

Current woodland grant schemes are too prescriptive and the application process overly complex and this has resulted in low uptake of funding options by agricultural businesses.

There are some changes that would allow better complementarity between forestry and agriculture options including the introduction of individual farm-based climate and biodiversity action plans which could include the integration of woodland but should be based on guidelines rather than prescription, and which can be adapted to a range of land types, farm sizes and intended outcomes. This would encourage uptake by farmers and crofters.

The requirement to adhere to minimum areas and stocking densities for woodland should be removed with a more flexible approach introduced so that for example if the intention is to create a low-density planted habitat as favoured by black grouse then this should be encouraged.

Individual specimen native broad-leaved trees or groups of native broad-leaves and conifers could be supported as a landscape and biodiversity measure.

Many farmers - as part of their action plan - would be willing to incorporate small amenity plantations of seed-bearing trees such as hazel, oak, rowans, hawthorn, birch, holly and alder and this kind of nature enhancing scheme should be encouraged and supported.

In terms of larger scale commercial forestry, this should be limited to a percentage of rough pasture where livestock production is difficult and payment rates should be equivalent to agricultural support for the same grade of land.

In the case of whole farm change of land use from agriculture to large scale forestry, this should be funded through private investment or dedicated funding following consultation with local communities including the farming community, but funding should certainly not come from the Agriculture Budget.

## 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 key to resilience is diversity and biosecurity and current standards already recognise this. Diversity must be written in to any future support package on the basis that some species will better withstand extremes of weather as well as having inbuilt immunity to pests and diseases. Should one species fail due to disease or drought, others may prove to have greater resilience. It is right that current standards should be strengthened.

There is a case for better targeting of support for scientific research into tree disease. In the case of some diseases - for example ash dieback - it appears that some trees remain healthy while others are killed as a result of disease. It may be worth collecting seed from trees which remain healthy on the grounds that they appear to have natural immunity, and gathered seed may be grown to provide a more resilient stock.

4. Private investment through natural capital and carbon schemes can make a valuable contribution to climate change. Do you agree that the grant support mechanism should have more flexibility to maximise the opportunities to blend private and public finance to support woodland creation,

No

Please explain your answer in the text box.:

The value of natural capital and carbon offset potential of Scotland's finite land resource has attracted buyers and investors from far and wide. The market appears to be completely unregulated and I see this as a weakness in land use policy which should be urgently addressed. It's unclear to me how land purchased to offset the carbon emissions of major polluters elsewhere in the UK and abroad can also be claimed to be contributing to Scotland's carbon status. Current policy is in effect allowing the asset stripping of a valuable home-based resource. It is therefore my view that the attractive grants attached to planting purchased ground are not an appropriate use of public funds.

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.:

More flexible options, less prescription and a lighter touch from SF officers throughout the planning, application and claims process would encourage uptake of schemes.

The current funding package could be improved by inviting every farm and rural business to develop a supported climate and biodiversity action plan including integration of trees to encourage all rural businesses to make a contribution to climate mitigation and adaptation and nature enhancement appropriate to land type, farm size and intended outcomes.

The support of a one-to-one dedicated woodland officer to each farm business would stimulate woodland expansion of all types.

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?:

As already stated the key to improving resilience is ensuring species diversity and biosecurity, A commitment to adopting best practice to increase resilience against the impacts of climate change and pests and diseases should be written in to farm action plans, and a long-term commitment to management objectives must be demonstrated at the outset.

### 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, Support with cashflow, Information on how current land use could continue with trees integrated throughout

Are there others not listed above?:

It would better help to reduce barriers if there were a source of UNBIASED advice and a recognition that forestry is not the only land use contributing to achieving net zero and enhancing biodiversity.

The Scottish Government's determination to increase tree cover through woodland expansion - often at the expense of sustainable food production - is in itself a barrier which is discouraging farmers' and crofters' uptake of planting schemes.

The current heavy-handed approach used by woodland officers creates a barrier and does not incentivise farmers and crofters to include woodland in their farm businesses.

I would like to see a partnership approach where farmers, crofters and rural businesses work together with government agencies on an equal basis to deliver on shared goals for climate mitigation and adaptation, nature enhancement and sustainable food production.

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.:

In this high hill area (Eastern Dumfriesshire) there is a low survival rate of small woodland establishment particularly of native broad-leaved trees and this significantly increases the cost of establishing new woodland. Looking at the reasons for this it appears that dry springs and harsh winters have been contributory factors.

As stated previously support for the development of bespoke climate and biodiversity farm action plans with recognition of the challenges associated with introducing new woodland will increase uptake. Costs associated with environmentally friendly plant protection products should be supported. Also a partnership approach between government agencies and farmers and crofters working towards shared goals will deliver better results.

### 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 WIAT scheme already offers enhanced payments for this purpose and although I haven't had any direct experience of this scheme I would assume that given the generous grant support already available there shouldn't be a requirement for additional support.

It must also be taken into account that some communities have a strong connection to their open managed landscapes, environments and farming heritage and this must be respected. It very much seems that in many instances woodland expansion is forced onto communities as 'a good thing' without proper meaningful engagement.

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.:

I can already think of some successful initiatives where communities have taken on areas of neglected land within urban and semi-urban environments and created imaginative facilities for old and young such as quiet meditative areas, wooden and stone sculptures, wildlife feeding sites, mud kitchens, ponds and paths. Community orchards, allotments and plant nurseries can also build wealth and provide physical and mental well-being. Funding for these initiatives could come from a number of alternative sources including local authorities, lottery money, community led fund-raising and FGS options.

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.:

Through a more genuine and meaningful engagement process between communities and developers. It is an irony that the Scottish Government claims to champion community empowerment but then provides consultation processes where pressure is placed on communities (including farming communities) to support proposals for forestry development against their will. This kind of process only serves to undermine community involvement in forestry development and may build resentment and barriers.

An example of this is a proposal to plant a large hill farm close to Langholm with Sitka spruce and some native broad-leaved species. The community currently cherishes the open landscape where they walk and cycle and enjoy the wildlife and views associated with the extensively grazed environment. The community doesn't want to see this hill planted but the farm has recently been sold for forestry development. The community has found it necessary to launch a petition to emphasise its objection to the proposal.

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.:

Early, meaningful and open consultation and involvement of communities. Adopt a partnership approach rather than a dictatorial one. Most importantly, listen to communities and local land managers and embrace their aspirations and work round them to deliver shared objectives.

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?:

The forestry sector appears to have been well supported and I would question the need for further stimulation of rural businesses associated with the forestry sector through the use of public funding for capital costs. This targeted funding suggests that there is a greater political commitment to supporting a successful forestry sector rather than a farming sector where there is a pressing need for similar capital investment to ensure ongoing sustainable food production.

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

There is a skills shortage of machinery operatives in the forestry sector and this is going to become a major issue in the near future with the need to remove large areas of larch infected with Phytophthora as well as addressing normal rotation. There needs to be a recruitment drive to address this. Our rural colleges must rise to the challenge by developing training courses to encourage and bring on the next generation of skilled operatives and this may require intervention funding.

It is also difficult to source the low-skilled labour force required to plant steep inaccessible sites where mechanical means are impossible, and to undertake the ongoing management of establishing young woodland. There is no pool of low-skilled labour for this type of work and with unemployment at relatively low levels I don't see an easy solution beyond exploring the migrant labour force, retraining summer migrant workers or increasing the allocation of migrant workers to meet specific employment needs.

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.:

Processes and rules within the FGS have increased the red tape and expense to companies of providing training opportunities for new entrants to the sector. There are no shortcuts to gaining skills and building experience and it seems unlikely that rules will be eased in the current climate of heavy regulation.

Training officers will need to be employed and expensive machinery made available to meet training needs and demand. It follows that funding will need to be found either from within companies or from the public purse.

## 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.:

More care must be given to assess site suitability for forestry expansion. High nature value extensive grazing systems provide habitats that support a range of species including red-listed birds and plants. The current policy risks repeating the mistakes made in the 1980s when vast areas of peatland were blanket planted with commercial forestry resulting in significant loss of habitats. The Scottish Government appears to be blind to the further loss of important habitats if HNV farming systems are lost as a result of misguided forestry expansion policies.

Native woodlands do offer a range of habitats and have high nature value and it is right that this type of woodland is maintained and enhanced through grant funding. However it must be recognised that it can be extremely difficult and costly to establish new native woodlands and often a large percentage of young trees will die in the first few years. Where woodland is created on suitable sites environmentally friendly plant protection products must be encouraged and supported due to the high costs of these products. It must also be recognised that many farmers are already overstretched and commitment to managing high-maintenance young woodland is sometimes patchy. Against this backdrop the challenges associated with expanding native woodland must not be underestimated.

The environmental benefits of large scale commercial coniferous forestry are less evident. Commercial forestry is easier to establish and less costly but the claim that this type of large scale development increases biodiversity and delivers environmental benefits is flawed. Young trees can provide a food source for small mammals and birds but as the trees mature and light is blocked out, the forest floor becomes completely devoid of plant life. Further to this the focus of commercial forestry expansion tends to be on extensively grazed rough pasture which is already an important habitat and an effective carbon store. A broader approach must be adopted in future as no single land use can claim to realise more environmental benefits than the one it's replacing.

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?:

I see no easy way of effectively managing deer populations through forestry grant support mechanisms. The ideal would be to protect young trees with an environmentally friendly plant protection scheme.

Most browsers can be managed with tree protection products such as mesh guards, voleguards, tree tubes, spirals or fenced enclosures. However deer can pose a more significant threat to young trees, particularly to regeneration. Deer fencing is not environmentally friendly nor is it entirely reliable and it follows that deer will remain a challenge unless strictly controlled through culling and it must be questioned how ethical this practice is.

Small scale mixed land use?:

The same problems, the same limited solutions.

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

Please add your comments here.:

Through this consultation the Scottish Government has demonstrated its failure to recognise the flaws in its woodland expansion policy. No single land use can be treated in isolation and an increase in commercial afforestation will have many lasting and irreversible implications for our nations ability to feed its people and to protect some of its most endangered species. We are at risk of repeating many of the mistakes made in the 1970s/80s when trees were planted inappropriately with little thought given to the negative impact on landscapes and biodiversity, extensively grazed habitats, location, access and suitability of sites. The preambles in most sections make broad and sweeping assumptions that lack proper scientific evidence and lead respondents to answer the questions in a particular way.

I recommend that the Scottish Government takes a big step back to assess all the implications of its woodland expansion policy before encouraging farmers and crofters to make irreversible decisions on how they care for their land.

### About you

What is your name?

Name:

[Redacted]

What is your email address?

Email:

[Redacted]

Are you responding as an individual or an organisation?

Individual

What is your organisation?

Organisation:

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