

**LIS RESPONSE TO SCOTLAND'S FORESTRY STRATEGY 2019-2029
SUBMITTED TO SCOTTISH GOVERNMENT - 29.11.2018**

Q1. Do you agree with our long-term vision for forestry in Scotland?

Yes, LIS agree with the vision of having a Forestry Strategy, but we believe it needs to go further and state clearly how this will be achieved. It is generally a positive approach that recognises the shared objectives that is required for forest and woodland Strategy – human, economic and environmental. However, it has not fully set out what the public benefits really are and most importantly how these will be delivered. The Forestry Strategy is an opportunity as an overarching national Strategy to put into practice many of the Scottish Government's commitments and these should be expressed and linked to the new Strategy, including:

- **European Landscape Convention** – the UK is a signatory to the Council of Europe's European Landscape Convention, localised through the Scottish Landscape Charter, which promotes the protection, management and planning of landscapes
- **Land reform** – The Scottish Government's recent guidance on community engagement is an essential reference point for the Strategy as afforestation or deforestation would constitute a significant land use change under Scottish Government guidance.
- **The Land Use Strategy** – is only briefly mentioned and yet it is intended to be a comprehensive approach to delivering the best uses of our land
- **Scottish Biodiversity Strategy** – this includes a commitment to promote 'high nature value farming and forestry', which is absent from this draft of the forestry Strategy. High nature value farming and forestry is defined as extensive, rather than intensive production, and is sensitive to the need to meet other biodiversity objective.
- **Scottish Planning Policy** – more generally, the Strategy is weak on landscape issues, and makes no mention of how designated landscapes could be protected or enhanced through the Strategy.

The document states that the Scottish Government has already adopted the 1993 definition of 'sustainable forest management', as incorporated into the UK Forestry Standard and it's unclear what additional principles will be applied with the Strategy. The terms '**sustainable**' and '**natural capital**' need to be clearly defined.

The Strategy would do well to include a preamble to explicitly define woodland, forestry, natural woodland that appear in the document as well as acknowledge the importance of these less clearly obvious woodland types. – e.g. scrub woodland, montane scrub woodland, wet car matrix. 2.3 is the appropriate point for this

The benefits described at p12 mentions iconic landscapes, but this is only a small subset of the wider importance to landscape generally – whether iconic or quotidian: Woodlands and forests are vital components of the character of our landscape, providing pattern and structure, shelter, framing of views, texture, colour, seasonal effects.

Box 2 provides context for the Vision in that it sets out existing commitments, specifically relating to climate change and biodiversity. It may be better to provide this information as context for the Vision statement. This would clarify the linkage between this Strategy and, for example, Scotland's **existing**

commitment to the 2018-2032 Climate Change Plan to ensure they are taken forward into the new Strategy.

Bullet points need to also include:

- Sustained level of timber production for home and UK markets, to reduce the importation of timber.
- Expansion of native woodland cover.
- Forestry planning and design that responds to landscape character and avoids adverse impacts on cultural and historic landscapes.
- Increases the measured natural capital benefits of forestry in Scotland.

A Commitment to the principle of the 'right tree, in the right place for the right purpose' is welcome, as is the emphasis on integration with other land uses.

Q2. Does the Strategy identify the right objectives for forestry in Scotland over the next 10 years?

The three objectives - environmental, economic and social outcomes should be treated together and not separately. This is critical to achieving the multiple, broad ranging benefits that forests and woodlands can deliver as a totality.

Clarity is needed around the meaning of the word 'sustainable' in this context. Forestry's contribution to climate change mitigation should feature here as a key objective

There are several relevant UN Sustainable Development Goals (SDGs) that are missing and should form part of Figure 1 and the Strategy:

- **UN SDG 7** – Affordable and clean energy. Biomass energy production, especially in rural and remote locations, is part of forestry benefits and should be in the future Strategy.
- **UN SDG 12** – Responsible consumption and production. Promoting the greater use of home-grown forest products, from more varied hardwood and softwood species, through research and technological innovation, should be an objective in order to make better use of domestic forest products. There should be an objective to increase the quality of UK forest products so that it can displace imported timber products from less sustainable sources.
- **UN SDG 14** – Life below water. Forestry should contribute to improving aquatic environment as part of better catchment management, reducing flood peaks and reducing soil and nutrient losses to water.

Q3. Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives?

- **Item 4.7** – mono-culture of non-native species forming part of the forestry industry is not identified as a distinct issue. Reliance on a single species is a key vulnerability
- **Item 4.10** - should include recognition that forestry planning, planting and management needs to respond to the local landscape character in a positive and appropriate way, so that potential

adverse impacts identified in the SEA are avoided. Mono-culture of non-native species forming part of the forestry industry is not identified as a distinct issue. Design is important. In addition, the SEA states that forests and woodlands have the potential to enhance landscapes and the historic environment, but that there is also potential for conflict, and that developments will need to be well-planned designed and managed to resolve these conflicts. There is no reference in the strategy to the need to managing competing or conflicting land uses, or how this will be done.

- **Item 4.13** - should mention the positive effects of urban forestry on landscape character and visual quality; this is a tangible benefit separate to economic and health effects.

There is no real reference to the benefits and opportunities of other types of woodlands such as upland, montane scrub woodland (Refer to LIS response to Q1)

Q4. Do the ten priorities identified in table 2 capture the areas where action is most needed to deliver our objectives and vision?

The way the document is set out makes it difficult to link priorities to the aims of the Strategy in addressing key issues. I think this should be more clearly expressed. In addition, the wording of some of the Priorities lack clarity in areas of action.

The SEA also advises that “Woodland and forest design should also be used to avoid or manage changes to the recognised character of cultural and historic landscapes” but a commitment to good design does not appear in the strategy priorities.

Benefits of upland reforestation are not set out (Priority 1) There is no mention of different types of natural woodland such as montane scrub (see Q1 response) which can have different benefits.

The SEA also advises that “Woodland and forest design should also be used to avoid or manage changes to the recognised character of cultural and historic landscapes” but a commitment to good design does not appear in the strategy priorities.

Again, it is an important priority to ensure that woodland/forestry planning, planting and management is informed by local landscape character, meaning that sympathetic design is required if other objectives are to be met. The SEA notes this need.

Q5. Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

CSGN - very effective mechanism across central Scotland to improve lives, tackle social inequality, support economic growth, help meet the challenges of climate change and allow nature to flourish.

Treewise Glasgow (1993 – 2003) was a successful project achieving urban forestry on vacant and derelict land around Glasgow. It combined environmental, social and economic objectives to take derelict land and create new urban woodland as a positive setting for the adjacent challenged city areas.

Q6. For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

CSGN through NPP3 has a proven track record and the evidence is well documented. The Helix is a particularly good example as this involved cross collaboration of numerous organisations. The Forestry Strategy is an opportunity as an overarching national Strategy to put into practice many of the Scottish Government's commitments

Treewise worked because it had a project lead (Scottish Enterprise Glasgow) able to set up and coordinate funding from various sources; it had a delivery partner rooted in the locality (the Wise Group), a partnership approach with Forestry Commission WIAT funding, and project objectives that included habitat and visual quality, employment training and derelict land treatment.

Q7. Do you think the proposed progress indicators are the right ones?

In general, but others should be included (see Q8) It is also unclear as to how the Strategy, with proposed priorities for action, relates to existing commitments and associated monitoring regimes

Q8. Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

The indicators should also include:

- Measurement of progress on improving the quality and diversity of forest products to market. Not just the volume of wood fibre, which is a low-grade product compared to, for example, veneer wood or hardwood timber.
- Measurement of forest yield based on £/ha of economic output compared to £/ha of public funding input.
- Measure the areas of forestry by character and type (e.g. native broadleaved, mixed, exotic conifer, montane scrub, riparian...) or different dominant species, to give a measure of canopy diversity and resilience against species failure due to pest/disease/climate change. The measure of total area alone is uninformative towards answering wider goals than purely timber volume.
- Measure of habitat connectivity and size.
- Biodiversity in areas of montane scrub
- Measure the land use activities displaced by the creation of new woodland/forestry.

Q9. For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

- Understanding improvements to the quality and diversity of forest products to market
- Information on resilience against species failure due to pest/disease/climate change and not just timber volume.
- Indicators on habitat connectivity, patch size and heterogeneity would indicate resilience to climate breakdown.
- Quantify and assess the knock-on effects of forestry changes e.g. loss of cultivatable land (with agricultural yield class) loss of other habitats, reduction in vacant and derelict land.