

## **RESPONSE TO SCOTTISH WOODLAND EXPANSION ADVISORY GROUP**

This is a personal response from Roger Crofts.

### **I have the following general points.**

- 1. There should not be a forestry or woodland expansion strategy in isolation from other strategic land use issues.** The recognition by the Scottish Parliament of the need for a land use strategy in the Climate Change (Scotland) Act 2009, following the substantive case made by the Royal Society of Edinburgh in its Inquiry report on the Future of the Hills and Islands of Scotland, is a clear signal that expansion of particular forms of land use cannot be taken in isolation from other forms which are often competing for the same land resources in the same location and often with a different range of public benefits. The national Land Use Strategy (LUS) should form the basis for judging the use of land at national and regional levels. The working groups being set up under the Action plan recently published should be the operational basis for determining the future uses of the land, rather than separate exercises such as this one on woodland expansion.
- 2. The expansion of forestry to the potential detriment of other uses of the land resources has not been adequately justified as being in the public interest.** It is recognised that the expansion of commercial forestry can have some public benefits in terms of providing a supply of soft woods for the wood processing industry with benefits of security of supply, maintaining employment in downstream industries and ensuring a more favourable trade balance in timber. But, as the report produced by MLURI some years ago demonstrated, it is very difficult to find space for the proposed expansion without detriment to other land uses which also provide a range of public and market benefits. Determining strategies on individual land uses is outmoded now that we have statutory provision for a land use strategy. In addition, the result is highly likely to create conflicts with other existing and potential uses without determining those uses which are of the greatest cumulative public benefit.
- 3. Proposals for the roll out of the LUS through a series of case pilots/demonstrations is the appropriate way to progress the future use of land for forestry and other uses** The proposals by the Royal Society of Edinburgh and also by the Southern Ayrshire and Galloway Biosphere Reserve Partnership for demonstration/pilot projects could form the basis for demonstrating new methods for allocating preferred land use in the public interest and for resolving conflicts between different interests. At present, there is no one decision making or regulatory mechanism which can adjudicate between different demands for the use of land at any spatial scale. The Town and Country Planning system, the Electricity Acts, the various EC Environmental and Biodiversity Directives, the forestry felling and restocking regulations and the statutes on agriculture under

the CAP and the SRDP do not have any common ground, unlike the LUS, and therefore are not suitable mechanisms.

4. **Resolution of conflict can only be undertaken if clear criteria are established.** Despite the fact that the LUS provides some strategic elements which might be construed as criteria for decision making, there is no clearly articulated approach and the LUS and its producers continue to ignore the fact that there is already conflict and that this will continue and is most likely to increase due to the competing interests for land some of which are relatively new and some of which have new public policy justifications. The RSE report on The Future of the Hills and Islands identified the key factors and I commend this to the working group (some of whom were members of that Inquiry). It will also be necessary to take into account the National Ecosystem Assessment which is the most comprehensive evaluation of the range of services provided the environment.
  
5. **The assumption that the objective is now about woodland expansion should fundamentally change the mind set of this target.** The expansion target was determined prior to the debates on broader land use issues and the need for an integrated approach. It is of note that the term forestry expansion has been changed to woodland expansion. This points needs clarification. If, as any reasonable definition of woodland expansion implies, it is about the expansion of existing native and largely non-commercial woodlands, that should be supported. However, if it is merely a code for commercial forestry expansion then it should be rejected as failing to meet the wider public requirements of food security through livestock farming, herbivore grazing to benefit species and habitats and to maintain open landscapes, including maintaining the ranges of moorland birds, and to ensure that water management in the upper areas of catchments is improved to meet the terms of the EU Water Framework Directive. Woodland expansion should be viewed not as planting more non-native species to satisfy the needs of the wood processing sector but this much broader approach. This should embrace the following elements:
  - i. expansion of natural woodlands through planting and natural regeneration, focussing especially on natural and semi-natural woodlands. This will require incentives and new guidelines on best practice natural regeneration and the development of woodland habitat networks;
  - ii. recognising through economic benefit assessments the value of native hardwoods for a variety of uses, including energy generation and construction;
  - iii. the development of new commercial woodlands only where there are no conflicts with landscape, biodiversity, and climate change targets and specifically should avoid open habitats especially in the uplands in order to safeguard carbon rich soils, landscape, biodiversity and upland food production, and in lowland areas to safeguard prime agricultural land.

6. **There should be higher levels of stewardship of all forestry and woodlands at all stages in their life.** There are still too many examples of poor practice in the management, thinning, felling and restocking of commercial forests, as is all too evident from visiting for example the Borders and Dumfries & Galloway. Despite some exemplars, such as the Galloway Forest Park, clear felling coupes leave occasional trees with no habitat or aesthetic benefit, modern extraction machinery creates damage to soil structure and to ground flora, leads to loss of soil carbon and results in loss of soil into water courses damaging fish feeding and spawning areas and reducing overall water quality. All of these effects can be currently seen and have been documented for example by rivers trusts. Commercial forestry needs much improved management and regulation to lessen the effects on the landscape and biodiversity and on ecosystem services, especially water quality. Any assessment of expansion of woodlands, therefore, needs to provide ways of resolving the problems of current management of commercial forests through new guidelines and constraints on management operations which do not align with good environmental stewardship.

In response to the 3 specific questions I have the following comments:

- (a) **Where you see opportunities for woodland expansion that are not currently being taken up:** There are a number of opportunities. First, woodland expansion and restocking should go hand in hand with onshore wind turbines. The removal of trees for wind turbine development, as in the upper Clyde valley makes no sense, whereas the placement of wind turbines in the commercial forest on the Kintyre peninsula provides multiple public benefits. Second, more woodland on farms to provide shelter for stock and for arable fields, as well as along river and stream courses, should become a reality through new packages under a revised agri-environment programme. Third, stimulating regeneration of native tree species in the uplands where it has been restricted to narrow gullies and ledges arrested by excessive herbivore grazing would be beneficial. Turning the infamous Glenlochry case of 20 years ago on its head by more enlightened management and advice from statutory agencies would help enormously. Fourth, extension of native and semi-natural woodlands along river valleys and streams to link small isolated stands into woodland habitat networks would benefit landscape quality, meet habitat targets and improve the nutrient status of water with benefits for fauna.

**What do you think is stopping such woodland expansion?** A combination of factors including mono-cultural thinking and practices in the forestry management sector, the remaining barrier between farmers and the active use of trees to improve their husbandry, and the failure of the environmental bodies to deliver on ideas of habitat networks. All of this requires in change in the mindsets of those owning and managing land and from those providing formal advice. To this should be added more multi-purpose policy objectives and incentive schemes under the SRDP. The lack of spatial strategies at national and regional scales for the multi-purpose use of land also creates tensions and conflicts between different uses, compared for example with the

trailblazing indicative forestry strategies of the late 1980s and early 1990s which helped to bridge the divide between commercial forestry expansion and nature conservation. More sophisticated approaches to spatial strategies are required under the aegis of the Land Use Strategy to ensure that multiple public benefits are achieved in decisions on changes in land use.

**(b) Examples of where woodland expansion comes into conflict with other land management objectives.** We are particularly interested to hear where current regulatory and consultation mechanisms do not seem able to prevent such conflict.

The decision making systems for renewable energy, for settlement expansion and for forestry expansion are all separate and none of them is allowed to venture into examination of alternative uses of the land, including maintenance of the status quo. Although in some cases the land owner can make the decision without reference to others, this is relatively rare where change is sought. The Land Use Strategy deliberately fails to address this issue in as is stated by the Cabinet Secretary in his Forward to the recently published Action Plan that no new mechanisms are needed despite admitting that many respondents had stated the need for them. The Advisory Group should consider how the gap can be filled by bringing together existing instruments.

**(c) The way that conflicts between woodland expansion and other land management objectives could be better resolved in future.** We are looking for practical and constructive suggestions which respect the diversity of land uses in Scotland.

The first step has been taken with the development of the 10 principles of sustainable land use published in the Land Use Strategy submitted to the Scottish Parliament in March 2011. The second step should be the development of regional land use strategies as recommended for example by the Royal Society of Edinburgh in its response to the Scottish Government on the land use strategy consultation. A case study approach could be a way forward to test the method and develop outcomes in different parts of Scotland. The Galloway and Southern Ayrshire proposed Biosphere Reserve, the north east of Scotland and island area should give good coverage on the different conflicts and different geographical situations. Third, all policies directly and indirectly affecting land use should be reviewed with a view to revising those which are within the scope of the Scottish Parliament and Scottish Government to reduce conflict and to increase the range of public benefits from the use of the land.

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