



EIR Ref: 2018/040

18<sup>th</sup> January 2019

#### **REQUEST UNDER ENVIRONMENTAL INFORMATION (SCOTLAND) REGULATIONS 2004**

We refer to your request for information, received by email on 9<sup>th</sup> December 2018. The information you have requested is environmental information, as defined in Regulation 2 of the Environmental Information (Scotland) Regulations 2004 (EIRs). The Park Authority has an obligation to deal with your request under the EIRs and an option to also deal with your request under the Freedom of Information (Scotland) Act 2002 (FOISA), unless the public interest lies in dealing with your request solely under the EIRs. We consider that the public interest in dealing with your request solely under the EIRs outweighs the public interest in also dealing with your request under FOISA, on the basis that the public interest is not served by duplicating consideration of your request under both regimes. We have therefore applied the exemption in section 39(2) of FOISA and dealt with your request under the EIRs alone.

Your specific request and the response from the National Park Authority are provided below.

**“Its unclear from your CEO report if the LLTNPA formally responded to the Forestry Strategy or not. If so, please provide a copy of the LLTNPA response along with any written submissions the LLTNPA may have made to FCS before or as a result of participating in the workshops that preceded the production of the draft document.”**

The Park Authority submitted comments directly to Forestry Commission Scotland (FCS) in response to their consultation on the draft Forest Strategy. A copy of the comments is attached.

The Park Authority did not send any other submissions to FCS before or as a result of participating in the workshops that preceded the production of the draft document. Accordingly we have to advise under Regulation 10(4)(a) of the EIRs that this information is not held.

Yours sincerely

Governance & Legal Team  
Loch Lomond & The Trossachs National Park Authority

LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

National Park Headquarters, Carrochan, Carrochan Road, Balloch, G83 8EG Long: 4°34'24"W Lat: 56°00'12"N  
t: 01389 722600 f: 01389 722633 e: [info@lochlomond-trossachs.org](mailto:info@lochlomond-trossachs.org) w: [lochlomond-trossachs.org](http://lochlomond-trossachs.org)

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## Review Procedure

If you are dissatisfied with this decision, or the way in which the Authority has dealt with your request, you are entitled to require the Authority to review its decision. Please note that in order for a review to take place you are required to:

- Send your request for review in writing, setting out in full the reasons why you are requesting a review.
- Submit your review request within 40 working days of either the date on which you received a response from the Authority or the date by which you should have received a response under the terms of the Freedom of Information (Scotland) Act 2002, whichever is the later.
- address your review request to:

Governance & Legal Team  
Loch Lomond & The Trossachs National Park Authority  
National Park Headquarters  
Carrochan  
Carrochan Road  
Balloch  
G83 8EG  
E-mail: [info@lochlomond-trossachs.org](mailto:info@lochlomond-trossachs.org)

The review will be handled by staff who were not involved in the original decision. You will receive notice of the result of your review within 20 working days.

If you are not satisfied with the response to your request for review, you can contact the Scottish Information Commissioner, the independent body which oversees the Freedom of Information (Scotland) Act 2002, at:

Scottish Information Commissioner  
Kinburn Castle  
Doubledykes Road  
St Andrews  
Fife  
KY16 9DS  
Tel: 01334 464610  
Website: [www.itspublicknowledge.info](http://www.itspublicknowledge.info)  
E-mail: [enquiries@itspublicknowledge.info](mailto:enquiries@itspublicknowledge.info)

Online appeal portal: [www.itspublicknowledge.info/Appeal](http://www.itspublicknowledge.info/Appeal)

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## **National Park Authority response to Forest Strategy**

In accordance with the recent request from Morag Williamson, I am replying to the consultation on Scotland's Forestry Strategy 2019 – 2029 directly to you. This reply, on behalf of Loch Lomond & The Trossachs National Park Authority, has been prepared at officer level.

We welcome the production of the new Strategy, recognising the important role it plays in the devolution of forestry in line with the Forestry and Land Management (Scotland) Act 2018.

We particularly welcome the holistic scope of the objectives of the strategy and its positioning across the breadth of the National Outcomes. This makes it conceptually easy to relate to our National Park Partnership Plan 2018-2023. We are currently preparing a Trees and Woodlands Strategy for Loch Lomond & The Trossachs National Park, in close collaboration with FCS staff. We are aiming to get approval from the National Park Board in March 2019 to issue it for public consultation in April & May 2019. We see our Trees and Woodlands Strategy as a key tool for helping to implement our National Park Partnership Plan (NPPP) - which includes a target of 2,000 ha of woodland expansion by 2023, Scottish Biodiversity Strategy and Scotland's Forestry Strategy. In relation to the latter it will add a focus that relates to the Outcomes in our NPPP and a spatial element in relation to woodland management and creation opportunities in the National Park.

In response to the questions in the current consultation, our comments are as follows.

Question 1. We agree with the long-term vision for forestry in Scotland. As noted above, it integrates well with our NPPP.

Question 2. Yes, the strategy identifies the right objectives. They are necessarily written at a high level. This will require translation into more localised and sector-specific objectives and actions. Our Trees and Woodlands Strategy will play a part in this.

Question 3. Generally we are content with the assessment. There are three specific points we want to highlight that are pertinent to delivery:

Section 4.2 We welcome the recognition in the strategy that the role of forestry has to be considered in relation to other land uses. We are very aware that woodland creation is often seen as an alternative to farming due to a combination of many factors including land tenure, grant incentives and rules, auditing requirements and established ways of thinking. This leads to barriers to engaging farmers in woodland establishment. Practical steps to make farming and forestry more integrated would be very beneficial.

Section 4.7 This highlights a very real area of concern. We are very conscious of the current and predicted impacts of current pathogens on the future of woodlands and forests in the National Park. We would encourage further efforts, including use of grant approvals, for retaining a diversity of species being used for productive forestry. At present, Sitka spruce remains generally the most productive and popular species for producing a timber crop in the National Park and there are obvious risks to long term sustainability and supply if problem pathogens for Sitka were to arrive here in coming decades.

Section 4.8 This highlights sustainable deer management and we agree that this is essential. In practice, achieving sustainable habitat outcomes very often requires consideration of the combined browsing pressure of deer and other large herbivores including sheep and in several locations feral goats, and consideration of the interactions between them. Very often reductions in hill flocks are followed in due course by increases in deer numbers and an

increase in deer movements. We would welcome further focus on a more holistic consideration of this. For example, we have noted that Deer Management Groups can provide a forum where discussions on these matters can happen.

Question 4. No comments.

Question 5. We are aware of an inaccurate perception in parts of the forestry sector that our National Park is a 'problem' area for woodland creation, despite many new areas of woodland being created since the Park was established. We are developing our Trees and Woodlands Strategy and the promotion of it in ways that we hope will address this. Given the statutory purposes of National Parks in Scotland, woodland schemes here do need to deliver multiple benefits. We think that targeted funding incentives would be useful here, such as uplift for native woodlands and well-designed and well-sited mixed woodlands that deliver landscape, biodiversity and social benefits.

Question 6. No comments.

Regards

Alan Bell

**Alan Bell, CEnv, MCIEEM**  
**Landscape and Ecology Manager**  
**Loch Lomond & The Trossachs National Park**