

**Trees and Woodland Strategy 2019-2039** 

**Consultation report** 

September 2019

### **Summary**

There were 21 written responses submitted during the public consultation period. The responses were from a range of organisations and individuals. The comments are generally constructive and in the greater part recognise the contribution of trees and woodland to the National Park and reflect the overall aspirations set out in the strategy. However, a number of responders did not believe that the strategy gave sufficient consideration or details regarding topics such as productive forestry, biodiversity issues and wildness. There were also a significant number of comments regarding the vision which led to it being revised. Some responses related to the National Park Authority's role as a planning authority which were not relevant to this consultation. The Trees and Woodland Strategy has been revised and edited as a result of the consultation and the revised final version will be presented to the National Park Board.

#### Introduction

The National Park Authority Board approved the consultation version of the Trees and Woodland Strategy on 18<sup>th</sup> March 2019. The consultation draft had been written by officers in discussion with Scottish Forestry as well as engagement with a range of other stakeholders. A public consultation ran from 8<sup>th</sup> May to 10<sup>th</sup> June 2019; there also were two events held during the consultation period which were attended by 20 individuals, mainly land managers and forest managers/agents.

#### Responses

There were 21 written responses submitted during the public consultation, mainly from organisations, with two community councils and a number of individuals also providing responses. See Appendix 1 for full responses, Appendix 2 for the full consultation questions and Appendix 3 for the consultation version of strategy.

## Question 1 - This question referred to the Vision section found on page 13 in the strategy document.

Sixteen responders agreed with the vision with 15 wished to change the vision (providing suggested changes). These changes suggested greater prominence was given to topics such as wildness, creation of upper tree lines as well as a number of other single issues. The greatest number of comments was related to the vision failing to fully recognize of the economic role of woodland and forests.

## Question 2 - This question referred to the Objectives section found on pages 15-18 in the strategy document.

15 responders agreed with the vision with 15 wished to change the objectives.

21 responders provided further comments such as broadening the range of species from 'National Park flagship species' to 'National priority species', increasing the focus on productive forestry and associated carbon sequestration providing more ambitious woodland creation targets and creation of a native woodland creation target.

# Question 3 - This question referred to the Existing Woodlands section found on page 21 in the strategy document.

13 responders agreed with the Existing Woodland section with 13 wished to change the section.

17 responders provided further comments which generally called for the strategy to strengthen issues such as:

- Sustainable herbivore impacts in native woodland
- Additional details about PAWS
- The landscape-scale implementation of woodland management
- The financial impact of proposals
- Going beyond UKFS and UKWAS in relation to landscape-scale management and forestry standards

There was also criticism that the document is in the form of guidance rather than a plan.

## Question 4 - This question referred to the Woodland Creation section found on pages 22-25 in the strategy document.

14 responders agreed with the Woodland Creation section with 16 wished to change the section.

19 responders provided further comments which included concerns that the strategy does not give equal importance to productive conifer as to native woodland, wish for landscape scale herbivore control to remove the need for deer fencing, concern that improved woodland habitat network would lead to increase predation, support for the Landscape Capacity Study, concern that the level of landscape capacity acceptable for woodland creation is too low, concern about the loss of agricultural land, lack of specific plans to implement the strategy.

# Question 5 - This question referred to the Habitat Enhancements section found on pages 27-34 in the strategy document.

16 responders agreed with the Habitat Enhancements section with 15 wished to change the section.

18 responders provided further comments which included support for small-scale tree planting on agricultural holdings and a landscape-scale approach. However it was noted that no specific plans or target areas are identified. It was suggested that montane woodland expansion should be by natural regeneration and highlighted that Atlantic woodland comprises a range of climax species (not just oak). Concerns raised included lack of emphasis on Caledonian pine woods, that the current grant structure is not suitable, and lack of assessment of the financial cost of the proposed measures.

### Question 6 - This question referred to the Landscape Integration section found on pages 35-37 in the strategy document.

17 responders agreed with the Landscape Integration section with 9 wished to change the section.

12 responders provided further comments which included support for the Landscape Capacity Study and its use by both land managers and communities. There were some calls for more emphasis on landscape-scale restoration and some disagreement with the support for increased productive conifer where this woodland type already exists.

## Question 7 - This question refers to the Integrating Woodland section found on pages 40-43 in the strategy document.

12 responders agreed with the Integrating Woodland section with 14 wished to change the section.

16 responders provided further comments which included concerns that woodland creation is too restrictive e.g. in relation to deep peat, that deer are considered in a section referring to land use and that there is a lack of detail regarding cull targets for deer and goats. Suggestions were made to reduce reliance on deer fencing in favour of landscape-scale herbivore control, to consider the impact of small-scale tree planting on wading birds, to include National Scenic Areas and Wild Lands in designated sites and to include the role of oak coppicing and timber production in income generation for farms. There were also calls for a greater focus on agroforestry and the integration of woodland into existing agricultural holdings.

; more rapid reduced reliance of deer fence in favour of landscape scale herbivore control, impact on small scale planting on wading birds, inclusion of National Scenic Areas and Wild lands in designated sites, concern that woodland creation is too restrictive e.g. in relation to deep peat, role for oak coppicing, role of timber production in income generation for farms, concern that deer are considered in a section referring to "land use", lack of details regarding cull target for deer and goats, greater focus of agro forestry and integration of woodland into existing agricultural holdings.

### Question 8 - This question refers to the Economic Development section found on pages 44-46 in the strategy document.

14 responders agreed with the Economic Development section and 14 wished to change the objectives.

16 responders provided further comments which included a welcome recognition of the landscape impact of forestry infrastructure and suggestions that there should be an assessment of the economic importance of forestry and the impact of the proposed guidance on this economy. It was also noted that the benefits of recreational access of forest roads are not fully recognised. Changing forestry practice was suggested to create more local employment and there are opportunities to increase forestry skills in farmers. It was noted that restructuring of the first rotation of forests will reduce productive capacity while delivering increased multiple benefits .

## Question 9 - This question referred to the Woodlands and People section found on page 47 in the strategy document.

16 responders agreed with the Woodlands and People section and 11 wished to change the objectives.

14 responses provided further comments which included; disagreement with the use of the term 'responsible access', concern about the impact of antisocial behaviour on land

managers, support for access in woodlands due to its positive impact on wellbeing and the use of woodlands to provide alternative access routes to prevent conflict with livestock.

#### Question 10 - Are there any other comments you wish to make on the strategy?

11 responders provided other comments. These comments included; lack of monitoring for all objectives, recognising that the document is well written and laid out, concern that commercial productive forests are not considered a significant asset, highlighting a lack of specific targets and plans and suggestions that there should be significantly different forestry practices in the National Park.

#### How the responses were taken into account

There were constructive responses, which have led to minor edits in the document. However, there were also requests for changes, often conflicting, these were considered against the statutory aims of the park, the current guidance for woodland strategies and statutory powers of the National Park Authority (NPA). Some edits and additional information have been included in the revised strategy such as stating the statutory aims to address, were possible, these comments.

Some comments while not relevant to this consultation were considered relevant to other aspects of the NPA's work, such as community engagement and recreational access so have been highlighted to the relevant teams.

Many comments wished more specific geographic focus areas or specific targets for action to be detailed. While these comments led to a map depicting the areas important for key woodland habitat, it was considered that any further details would be better included in Wild Park or other streams of NPA work.

The strategy has been revised following the analysis of the responses received during the public consultation along with other developments since the draft was produced.

This revised strategy will be presented to the National Park Board for consideration in due course.

Appendix 1 – Full Consultation responses

Appendix 2 - Full consultation questions

See <u>link</u> for consultation version of strategy and associated appendices.