



Loch Lomond & The Trossachs National Park
Trees & Woodlands Consultation 2019
Submitted Comments

- Arrochar Tarbet & Ardlui Community Council
- Confederation of Forest Industries
- Forestry & Land Scotland
- John Muir Trust
- Loch Lomond Fisheries Trust
- Mountaineering Scotland
- National Farmers Union Scotland
- RSPB Scotland
- Saving Scotland's Red Squirrels
- Scottish Campaign for National Parks
- Scottish Land & Estates
- Scottish Natural Heritage
- Trossachs Community Council
- Tilhill
- Woodland Trust Scotland
- Individual 1
- Individual 2
- Individual 3
- Individual 4
- Individual 5
- Individual 6

All responses received from individuals have been edited to remove any information that would make individuals identifiable.

Organisation	Arrochar, Tarbet & Ardlui Community Council
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	No
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	With increased habitat connectivity, there will be an increase in predator behaviour i.e. Pine Martin, Otter, Fox, Badger etc. Predation on flocks of hens, ornamental fowl, caged birds, ornamental fish, rabbits etc. will increase with 100% fatality in some cases. Will there be a protection programme proposal offered to help individuals who will be under threat of continual attack from all predators?
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Again, greater movement of predators will devastate an already hard pressed song bird population,, small rodent, and Brown Trout. What protection proposals are being considered in defence of these species.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Landscape capacity in the main is described as medium to high. Does this mean full capacity is nearly in sight? Productive capacity is significantly lower, how will this be achieved. More Conifers! How open will the Nat. Park be in encouraging manufacturing/processing locations within the Park area
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Once new woodlands are established, how will the Park reconcile recreational activity with regard to planning applications in or near said woodlands?
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Comments</i>	How will the uses of timber products especially wood pellets required for heating systems be viewed against the Scottish Governments carbon emissions. What proposals are in place to protect aged species of trees. Will non native species be considered for specific/ special requirements.

Organisation	Confederation of Forest Industries
Do you agree with the vision?	No
Is there anything you would change about the vision?	Yes
	<p>There is a lack of acknowledgement of the balance of benefits we require from forests and the choices to be made to deliver these. It is unlikely that a 'native woodland habitat network' will deliver 'locally sourced timber' or 'carbon sequestration' at levels which are 'sustainable benefits from nature'. Nearby settlements like Glasgow and Stirling are already carbon emitters, and heavily reliant on timber harvested from overseas forests, and carbon-intensive materials such as concrete and plastic. For the surrounding countryside to reduce the timber producing and carbon-sequestering capacity of their forests would be a step back in sustainability. Although harvested timber appears to be carbon 'removed', if it is high-quality timber being turned into buildings in the region, it will store carbon for many decades into the future and, more significantly, displace the carbon emissions associated with alternative materials.</p> <p>The vision would be improved by changing 'a strengthened native woodland habitat network' to 'a strengthened mixed woodland resource'.</p>
Do you agree with the objectives and rationale?	No
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	<p>The balance between productive and biodiversity woodland given on p.5 (22.5% productive conifer, 7.5% native) is likely to substantially overstate the productive resource. At the very least, 5% of the productive resource will have been converted to native woodland under UK Forestry Standard, increasing the native woodland cover to 8.6%, and a minimum of 25% of the productive resource converted to alternative species and open space to create biodiversity habitat. This means the maximum conifer cover of the park is 17%, with at least 8.6% native woodland, and the remaining 4.4% of forest area a mixture of species such as Larch, Norway spruce and Douglas fir, and open space. Other considerations, such as requirements to remove conifers from deep peat and around watercourses mean that the productive resource is likely to have been reduced further. This can be easily seen by comparing the map on p.5 with satellite photographs of the conifer cover in the park.</p> <p>Failing to replace this lost productive resource, by concentrating planting on native woodland, incurs the risk of reducing carbon, timber and employment benefits; and threatening its long-term management such as protection from herbivores, disease and fire, creation of paths and bike trails, drain reprofiling, or red squirrel conservation projects, which are all funded from the proceeds of timber sales.</p> <p>The objectives and rationale should aim for net gain in both native woodland and high-quality timber production, based on a more thorough assessment of the forest resource, its forecast productive potential, and restocking levels following harvest. The Strategy should make clear what the ownership profile of the forest resource is, in particular the split between public and private ownership; provide a vision for how it expects this to change in future either through new woodland creation or asset transfers; and clarify the Objectives based on this information. In particular, there are frequent references to 'land</p>

Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	The objectives in this section are admirable but costly; and are unlikely to be delivered unless they are part of a financially sustainable forest resource. This section should include a costing to demonstrate the current and projected income from timber sales from the forest resource, and the resulting budget which can be expected to be available for reinvestment in managing herbivores and invasive species, restoring PAWS, improving infrastructure such as roads, and benefiting flagship species. Management techniques for productive conifer should be suitable for the site: for example LISS may not be suitable for the climate and soils across much of the park. Management of the resource should take into account developing resilience to future climate change impacts, including higher risk of wind damage (especially for conifers) and wildfire (especially for native woodland).
Do you agree with the targeting woodland creation section?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	There is little in the Productive Woodland Creation section which would not be delivered as a matter of course under the UK Forestry Standard. Any different requirements should be clear in how they add value to the woodlands, and not merely create further levels of complexity in an already-complex woodland creation process. An interesting proposal would be to facilitate the creation of high-quality productive woodland by exploring a fast-track approvals scheme for independently-certified woodlands. Woodlands are not usually certified to FSC or PEFC standard until they are due to be harvested, as there is no benefit to the owner in having them certified earlier. If certification at the point of creation provided owners with a quicker and therefore cheaper process, it could become a cost-effective way to ensure diverse and sustainable forests.
Do you agree with the strategy guidance on habitat enhancement?	No
Is there anything you would change about this guidance?	Yes
	The guidance should include a business plan linked to the costing exercise above, to ensure that income from timber sales across the woodland resource are adequate to deliver the enhancement envisaged, with proposals to encourage the private investment in productive woodland, and in due course the reinvestment in the woodland resource required.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	Yes. The Landscape Toolkit has received a very positive response from forest managers for its potential to deliver realistic and creative designs. It would be useful to see some case studies of its use in practice over coming years.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The strategy should include the integration of timber production into whole-farm business plans. In the context of the likelihood of reduced agricultural subsidies, an element of timber production could be vital in ensuring farm businesses, with their associated landscape and production values, remain viable.

Do you agree with the strategy guidance on social and rural economic development?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The guidance should be based on an assessment of the economic importance of the forestry resource, including timber, jobs, and ecosystem services, and a forecast of how the proposed guidance would change it.
Do you agree with the strategy guidance on woodlands and people?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	This section should include realistic proposals on how the park will ensure that public access to woodlands remains responsible, in an area with very high visitor numbers. Landowners should not have to bear the cost of impacts such as littering and fly-tipping, irresponsible fires, unauthorised huts or bike trails, or disrupted forest management work, as a result of facilitating greater access to woodlands. Measures provided by the park might include signage, penalties and enforcement for irresponsible behaviour, and infrastructure to encourage responsible behaviour such as litter bins, camping and picnic sites, and bike routes.
Additional Comments	http://www.confor.org.uk/media/247443/confor-response-to-lltnp-trees-and-woodland-strategy-june-2019.pdf

Organisation	Forestry & Land Scotland
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
<i>Additional Text</i>	I believe the contribution made by the productive conifer forests to the economy of Scotland should be highlighted as part of the vision. While native woodland can provide locally sourced timber as described, Scotland's wood processing industry benefits from the significant softwood resource produced within the National Park.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	No
<i>Additional Text</i>	These objectives are very much in line with FLS' approach to land management planning. many of which are already part of our established process. FLS have a further strategic objective of making forests and woodlands more resilient, to take account of damage by wind, fire, flooding, landslips etc.
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	There is a map showing "native woodland creation opportunities", but no corresponding map showing conifer forest creation opportunities. There is reference to the "Landscape Capacity Study" to view these opportunities, however this isn't as accessible as the map for native woodland. Perhaps a note explaining the difference in treatment may be useful. The second bullet point under "Productive Conifers" might be expanded to include "or can be improved to accommodate timber haulage".
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	Again, much of what is described in this section is already incorporated into FLS land management plans, and so is supported. Some woodland types (e.g. montane woodland) are significantly more difficult (and expensive) to establish. The benefits of these woodland types are recognised, however the challenges involved may discourage the inclusion of these woodland types in management plans without significant incentives.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No

	<p>FLS land management plans already have landscape as a key issue and forms part of the brief for the plan. The guidance will further help forest planners recognise the landscape issues, and create plans which take these issues into account.</p> <p>However, the practicalities of forest management will also have to be considered to ensure that plans being submitted for approval are deliverable, both in the short term as well as the long term.</p>
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	<p>FLS land management plans are designed to fully comply with the peatland guidance. Deer management is a key issue in all plans, particularly where broadleaves or “soft” conifers are proposed for planting or restocking. Infrastructure for deer management (particularly access and extraction routes) should be incorporated into the plan and considered for approval as part of the same submission.</p> <p>The negative aspects of deer fencing (visual impact, access issues, and cost of construction) are recognised, however in many circumstances such fencing is unavoidable to ensure successful establishment of a range of tree species. More tree planting within agricultural holdings, as described, is supported. Woodland creation and management can positively impact on flood risk and slope stability, and should be recognised as part of the response to climate change.</p>
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	<p>It should be recognised that in order to continue to achieve multiple benefits from existing forests through restructuring, the productive area will inevitably reduce. This can be offset by more productive conifer forests, and by designing existing forests to be more productive (using improved planting stock, more productive species (particularly broadleaves), planting productive conifers on optimal planting sites)</p> <p>Haulage – it may be worth noting that the agreements referred to between timber transport groups and Councils are voluntary agreements. I fully support the engagement with local stakeholders. I would suggest that the presence of forests and woodlands within the National Park are part of the reason most people visit the Park, and so make a positive economic contribution to the area through their existence.</p>
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	<p>Agree that woodlands and forests are ideal places for people to maintain healthy bodies and minds.</p>

Additional Comments	<p>The strategy will provide useful guidance for land managers during the production of forest plans. The strategy is well written, describes clearly the issues and the aspirations of the National Park.</p> <p>However there will be challenges in the implementation of the guidance, not least the resources required to both deliver the plan in the short term and maintain the plan in the medium to long term.</p> <p>In the private sector, there may well be tensions between the business model that an individual owner might seek to progress and some aspects of the guidance that may require discussion and negotiation.</p>
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Organisation	John Muir Trust
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
	Wildness is an important part of the National Parks natural capital. The vision would benefit from recognition of the importance of woodland in the wild qualities of the landscape.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	<p>Objective 1 There is currently no target for the proportion of woodland creation that is non-native conifer compared to native woodland. There needs to be such a target to ensure a majority proportion of new woodland delivers the widest possible benefits of biodiversity and landscape enhancement. New native woodland has the added benefit of avoiding some of the indirect negative impacts of productive forestry such as significant road building to facilitate extraction vehicles which will impact landscape quality in addition to the block-like visual impact.</p> <p>Objective 2 There should be an explicit preference stated for herbivore management avoiding fences where at all possible as they detract from the wildness experience of the landscape due to the fences themselves, but also the resultant harder landscape edges. Where capacity for new woodland is limited, especially where the location is an important dispersal route for woodland-dependent species, consideration should be made of conversion of non-native plantation to native woodland. The priority locations are likely to be PAWS but other plantations should be considered.</p> <p>Objective 3 The Trust welcomes the recognition of the importance of SLQs, particularly where this is related to wildness, but we consider this level of importance needs to be applied across the National Park. The Landscape Toolkit does not sufficiently make clear that valuable wildness is not confined to Wild Land Areas.</p> <p>Objective 4 The Trust recognises the importance of the potential economic benefits of productive forests, but we would like to see a commitment to growing the economic case for native hardwoods to further incentivise the planting of a diverse range of productive forests.</p> <p>Objective 5 The Trust welcomes the support for landscape scale co-operation.</p> <p>Objective 6 The Trust welcomes community involvement in woodland.</p> <p>Objective 7 The Trust welcomes support for the enjoyment and provision of educational opportunities within woodlands.</p>
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>The Trust agrees that two of the top priorities in native woodland are herbivore management and invasive species control. We support the presumption in favour of herbivore control rather than fencing due to improved landscape outcomes and naturalness of the resulting structure. Additionally, we welcome prioritisation of PAWS for restoration. We also support the commitment to take into account landscape visual impacts on planting and felling, but consider the Strategy needs to go beyond UKFS and UKWAS to take a landscape approach. This would mean ensuring that adjacent areas of felling do not exceed a maximum hectareage irrespective of different ownerships.</p> <p>Productive conifer forests should be managed for control of pests and diseases as a priority, especially where this may impact on the resilience of native woodland, an example being the potential for spread of Dothistroma from non-native lodgepole to native Scots pine.</p>
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>The Trust supports expansion of native woodland, as previously stated with a strong guidance towards herbivore control rather than fences. Where possible within that expansion, preference should be given for contributing to the Atlantic Woodland Alliance Strategy.</p> <p>We welcome directing new productive forestry to where existing extraction roads already exist. Forest roads, especially approach routes across open ground, have a significant impact on landscape with long distance visibility especially when built to standard timber extraction dimensions and structure.</p>

Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>The Trust especially welcomes the encouragement for montane woodland as a largely missing landscape element along with a natural treeline. This should be a specific target for development as it would benefit biodiversity and landscape.</p> <p>All Atlantic woodland sub types should be a priority, only oak is listed.</p> <p>We consider restructuring of productive conifer forests a priority. In the National Park, especially if poorly designed, this forest type has the potential for a significant negative impact against the backdrop of the outstanding landscape of lochs and more natural native woodland.</p>
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>We welcome the recognition of that the, “overview qualities include ‘wild and rugged highlands’.” The Trust considers this a highly important feature of the National Park that should be conserved wherever it is found, and not just in the named SLQ areas.</p> <p>Ensuring enhancement of the landscape character, particularly the more natural and wilder features, should be a priority in future woodland and tree focussed decisions and additionally need to consider cumulative impacts of productive conifer planting.</p>
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>The Trust considers that the transition from reliance on fencing to herbivore control is more urgent than indicated by the aim as in the medium to long term. We consider this should be the aim in the short term as restructuring, restocking, new planting plans arise.</p>
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>We welcome the recognition of the significant potential impacts of forestry road construction on wildness, and suggest that locations requiring minimal new infrastructure should be favoured for any productive forest creation.</p>
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>Woodlands have a greater capacity for visitors without impact on the experience of wildness than open habitats. We welcome encouragement for responsible access to enhance wellbeing, but also suggest that woodland educational opportunities be implemented.</p>
Additional Comments	n/a

Organisation	Loch Lomond Fisheries Trust
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	No
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	No
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
Additional Comments	n/a

Organisation	Mountaineering Scotland
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
	<p>a) Do you agree with the vision? There is little to disagree with the vision statement. The headline statement is rather bland – it could be made into something more inspiring.</p> <p>b) Is there anything you would change about the vision? There is nothing in the vision to indicate the desire to develop natural treelines up hillsides in parts of the Park. It may be implicit in the description, but a statement of intent to allow, in places, natural woodland development to its natural extent would be visionary.</p>
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the seven objectives and rationale? The seven objectives cover a wide range of woodland and woodland management aspects. There is nothing that we would disagree with. The recognition of herbivore impacts is an essential point to emphasise. We welcome the attention given to the landscape and wild qualities of land through the Landscape Toolkit. We agree with the promotion of active recreational pursuits in woodlands and the cross-referencing with other recreation strategies.</p> <p>b) Are there any changes you would make to the objectives and rationale? Objective 3 Protecting and Enhancing the Landscape: We think that woodland design parameters should include potential harvesting impacts and forest infrastructure like roads, as well as planting design.</p> <p>Objective 7 Encourage and Promote Public Access for Recreation and Improving People's Quality of Life: We agree with the objective, but think that more could be made of both public and private forestry/woodlands' contribution to promoting access, beyond new tracks for woodland management. They tend to be wide, surfaced haulage roads following contours. More narrow paths are more appealing and can aid passage through woodland up and down the hill following the desire lines of recreational users.</p>
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the Management of Existing Woodlands section? In general, yes.</p> <p>b) Is there anything you would change about this section? Improvements in woodland condition are more than just stand diversity. The policy may benefit from a statement that woodlands are an ecosystem, not just a collection of trees – the plant and fungi component is essential for diversity. This would explain the desire to focus on Designated Sites and Ancient Woodland.</p> <p>Management of herbivores to sustainable levels requires more definition of what sustainable means. Deer control is effective across a range, not site specific.</p> <p>Productive conifer forests – A National Park should have higher standards of land management than other parts of the country. A strong steer could be given by stating that large clear-fell coups are a thing of the past. 'Careful planning and construction of forest roads and other infrastructure' could be helpfully linked to the Parks Special Landscape Qualities, that is, appropriate to the locale. Standard design specifications may not be appropriate and flexibility of design is required.</p>
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the Targeting Woodland Creation section? Yes, and we think that opportunities mapping may be helpful to place the right tree in the right place. The statement to encourage more wind-firm coupes will help reduce the need for large-scale felling and should improve the appearance of the landscape.</p> <p>b) Is there anything you would change about this section? We agree with the statement that fencelines can adversely impact on landscape and recreational access. We would like to see an intent to manage herbivores that reduces the need for fencing and allow for more natural woodland regeneration, leading to natural treelines developing in a few identified places.</p>
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the strategy guidance on habitat enhancement? Yes. Montane woodland and natural treelines would be a major benefit for landscape and wildlife. Climate Change and tree health – agree with the need to raise public awareness of biosecurity and fire-risk in woodlands</p> <p>b) Is there anything you would change about this strategy guidance? Some emphasis on natural regeneration of existing stands of montane woodland being preferable to planting, with planting being an option where no seed source exists. Herbivore control is essential and best done without fencing, for landscape and access reasons.</p> <p>Restructuring of Productive Conifer: more emphasis on the desirability for soft upper edges for landscape and wildlife reasons.</p>

Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the strategy guidance on landscape integration and special landscape qualities? We strongly endorse the statement - Sensitive design of the transition between forest and open areas can be achieved using varied planting densities, species diversity and open ground. These design principles can also be applied adjacent to recognised recreational routes, both formal and informal, to create a varied experience for users.</p> <p>b) Is there anything you would change about this strategy guidance? Make more mention in the chapter of wild land qualities as an important feature of the landscape experience. The Landscape Capacity Study recognises them.</p>
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the strategy guidance on landscape integrating woodland and other land use? In general, yes. We welcome the recognition of importance of open ground habitats and peatlands in the uplands, as well as the challenges faced by deer management and the rationale to reduce deer fencing.</p> <p>b) Is there anything you would change about this strategy guidance? There is an omission of National Scenic Areas in the Designated Sites section. It may relate to the Special Landscape Qualities, but NSAs have a legal status that should be recognised. Related to this is the need for inclusion of Wild Land Areas 6, 7, and 10. These are not designated sites as such but are recognised as of National Importance in Scottish Planning Policy (paragraphs 200 & 215) and the National Planning Framework 3 (paragraph 4.4). We believe it would be helpful to define what sustainable management of wild deer actually means. We agree with the need for control over their wild range but also there is a need for a more natural herbivore/predator balance in the hills for natural regeneration without fencing. Deer are part of the wild herbivore balance, but voles and hares play a part too. More natural predators are needed to manage them. This may be controversial, but is part of restoring a natural balance.</p>
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the strategy guidance on social and rural economic development? In general, yes</p> <p>b) Is there anything you would change about this strategy guidance? Forest Roads and Tracks – we welcome the agreement on process, but query what road specifications would be for individual areas. Forestry standard of 3m width may be acceptable for extraction, but is visually intrusive, especially if constructed during the planting phase. We think that this is not acceptable for a National Park. Planting an area can have a narrower track specification, and extraction routes may be restored down again. Higher standards must be applied in a National Park than to the rest of the country.</p>
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>a) Do you agree with the strategy guidance on woodlands and people? Yes, it is important that people and recreational access are part of woodland management</p> <p>b) Is there anything you would change about this strategy guidance? Yes. We suggest changing the section heading from 'Responsible Access' to 'Access Rights and Responsibilities'. This makes it clearer what is meant, and reflects the wording and intent of legislation and guidance in the Scottish Outdoor Access Code. On the content of signage, signs need to be of minimum area required as well as duration. We support the statement on adequate gate provision for access takers – not just for formally recognised paths, but also for popular informal routes from roadside to hill tops.</p>
Additional Comments	n/a

Organisation	National Farmers Union Scotland
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
<i>Additional Text</i>	NFU Scotland would suggest that there also needs to be some reference made to the economic benefits that sustainable woodland management and forestry can deliver.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	<p>NFU Scotland would like to emphasise that whilst we support the objective of increasing woodland cover this must be done in such a way that it safe guards and enhances the productive agricultural capacity within the park. Productive land is a limited resource and any loss to new planting must be very carefully considered. NFU Scotland would prefer to see a more integrated approach to incorporating hedges, trees and woodlands on to farms, which can give a win-win for both sectors. NFU Scotland in principle is opposed to whole farms being converted to woodland, with the complete loss of agricultural productivity. We would like to see much greater use being made of agroforestry systems, that can deliver woodland expansion and a benefit to the farm/estate unit. This can include individual trees and hedges, grazed woodland, shelter belts, strategic new planting as well as more traditional agroforestry silvo-pastoral systems.</p> <p>In relation to public access NFU Scotland would like to see opportunities identified where access through woodlands and forests can be used/encouraged to divert people from undertaking access that brings users in conflict with agricultural operations and livestock. All access use should be responsible and follow the Scottish Outdoor Access Code, and in particular the newest guidance in relation to dogs and livestock.</p>
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>NFU Scotland would like to see greater support to farmers and land owners in relation to management of small scale existing woodlands in particular. This should include access to better guidance and advice covering a whole range of forestry operations e.g. thinning, small scale harvesting, use for firewood/biomass, timber marketing, control of invasive species, conservation grazing etc. NFU Scotland would welcome the ability of farmers and land owners to access a 'Shared Forester' as suggested by the Argyll Small Woods Cooperative project.</p>
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>As in Q2 above NFU Scotland would like to emphasise that whilst we support the objective of increasing woodland cover this must be done in such a way that it safe guards and enhances the productive agricultural capacity within the park. We welcome the use of the term 'sensitive woodland expansion'. Productive land is a limited resource and any loss to new planting must be very carefully considered. NFU Scotland would prefer to see a more integrated approach to incorporating hedges, trees and woodlands on to farms, which can give a win-win for both sectors. NFU Scotland in principle is opposed to whole farms being converted to woodland, with the complete loss of agricultural productivity. We would like to see much greater use being made of agroforestry systems, that can deliver woodland expansion and a benefit to the farm/estate unit. This can include individual trees and hedges, grazed woodland, shelter belts, strategic new planting as well as more traditional agroforestry silvo-pastoral systems. Whilst, we would agree with the concern over loss of open ground in relation to priority habitats and species, NFU Scotland would have similar concerns where any significant loss would lead to the loss of hefted sheep flocks and where it could lead to the loss of critical mass and undermine the viability of agricultural activity in the area. The recommendations made in 2012 of the Woodland Expansion Advisory Group should still be relevant today. The opportunity to have a higher grant premium to support the small scale planting on farms, to make it economically more attractive, should be supported.</p>

Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
	Again recognition that farmers/land owners can be part of the answer when looking at habitat enhancement and with the required support and advice they can deliver on a number of the objectives. The National Park Tree Planting Grant Scheme is a useful way of encouraging farmers and land owners to look at some strategic small scale planting and NFUS would like to see this continued and promoted to farmers.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	NFU Scotland welcomes the inclusion of a specific section on integration with Agricultural Land Management. As mentioned in Q4 above NFU Scotland would like to see a more integrated approach to incorporating hedges, trees and woodlands on to farms, which can give a win-win for both sectors, whilst safeguarding the productivity of the better agricultural land. NFU Scotland in principle is opposed to whole farms being converted to woodland, with the complete loss of agricultural productivity. We would like to see much greater use being made of agroforestry systems, that can deliver woodland expansion and a benefit to the farm/estate unit. This can include individual trees and hedges, grazed woodland, shelter belts, strategic new planting as well as more traditional agroforestry silvo-pastoral systems. More accessible advice to farmers and land owners on how they can integrate woodland cover on to their farms would be welcome – again this could be fulfilled by a Shared Forester.
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	It would be useful to highlight where there are opportunities for farmers to develop their skills as foresters, so that we can get better integration between farmers and woodland management; similar to the Norwegian model. Access to affordable courses that could be undertaken to enhance their skills and understating of woodland management – similar to some of the courses that the Argyll Small Woods Cooperative have been offering. Also recognition that there are transferable skills that farmers have that could be used within the forestry sector.
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	As stated in Q2 NFU Scotland would like to see opportunities identified where access through woodlands and forests can be used/encouraged to divert people from undertaking access that brings users in conflict with agricultural operations and livestock. All access use should be responsible and follow the Scottish Outdoor Access Code, and in particular the newest guidance in relation to dogs and livestock. When encouraging responsible access into woodland areas it is important to consider how people get to these areas and if they have to go through agricultural land what impact will this have i.e. how can access be best managed to avoid conflict with other land uses? Important to emphasise, and to raise awareness, that the countryside is a working environment and many people need to be able to earn their living from that environment; and access users need to respect and understand that.
Additional Comments	n/a

Organisation	RSPB
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
<i>Additional Text</i>	We strongly support the recognition that native woodland habitats will be expanded and strengthened because of the existing large discrepancy in the proportion of native broadleaves to productive conifers found in the NP. Suggest adding text in red to vision: Careful woodland management and creation will minimise the potential risks of the spread of plant disease, invasive species, impacts on other important habitats and species and wildfires while having sustainable populations of wild and domestic herbivores.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	We are extremely disappointed that none of the seven strategic objectives mention biodiversity or priority species and habitats. Page 7 Themes to deliver strategy – The strategy includes guidance on expanding woodland habitat networks, riparian and montane woodland and priority woodland habitats to increase diversity and protect flagship species. The importance of tackling invasive non-native species is also documented, as well as the restructuring of productive conifer forests (including PAWS restorations), climate change and tree health. Flagship species should be changed to priority species as this term is used for only a few species identified in the NPPP. There are many more species that must be considered. Objective 1 Increasing Woodland Cover - The Trees and Woodland Strategy will promote woodland creation that provides multiple benefits for the National Park, especially where it delivers on the conservation objectives outlined in this document. Support Objective 1. We welcome the identification of native woodland as a priority here due to the huge disparity in the proportion of native to productive conifer in a NP. Objective 2 'The key constraints are unsustainable herbivore impacts (both domestic and non-domestic), invasive species, woodlands with limited species diversity and age structure, and limited woodland grant management options'. We would add that limited funding available for woodland management is also an issue and by inserting the word grant clarifies what we think is meant by limited woodland management options. Implementing Objective 2 Improving Woodland Condition and Diversifying Woodland Management - The Trees and Woodland Strategy will identify issues and solutions to enhance woodland management, with a focus on priority woodland habitats and flagship species found within the National Park (as defined in the National Park Partnership Plan 2018 – 2023). The Strategy will encourage increased woodland diversity in species and age structure to deliver more resilient woodlands. There are many more priority species that this strategy should deliver for, than just the few flagship species identified in the NPPP. It would be dangerous to only focus on these species to the possible detriment of others.
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No

Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<p><i>Additional Text</i></p>	<p>Targeting Woodland Creation 'As part of the due diligence process for any proposals, such factors such as deep peat, designated features, landscape character, cultural heritage, priority species and habitats or other wildlife constraints must be assessed on a site-by-site basis. Early engagement with relevant stakeholders is key to identify the opportunities and issues with a specific site'. 'The National Park hosts a wide range of open habitats important for the wildlife they support, the jobs they provide and the wider ecosystem services they deliver. These include farmland providing habitat for wading birds; peatlands; moorlands and species-rich grasslands hosting a broad diversity of fungi, plants and animals. If carried out sensitively, new woodland creation will compliment and not conflict with these other important land uses' Welcome inclusion of both these statements.</p> <p>Native woodland While native woodland generally has a lower impact on the landscape, care is still required when designing the planting boundaries and fence lines to ensure they are sympathetic to the landform, animal movements, existing woodlands and recreational access routes. This statement should include 'animal movements' to encompass deer movements and black grouse flightlines, even badgers and otters where rabbit netting is used along the bottom of fences. Appendix 1 Spatial analysis for native woodland creation opportunity Preferred area results (middle paragraph), 'However this analysis does not take into account any constraints other than ones detailed in the WEAG, for example; important habitats, species or other land use priorities. Therefore, any woodland creation opportunities "supported" by these maps would still need further assessment including more detailed surveys to ensure these features are taken into account'. This paragraph should perhaps be highlighted to show that there are other constraints that haven't been considered eg golden eagle territories outwith the Glen Etive and Glen Fyne SPA or deep peat as ideally the SNH Carbon & Peatland Map should have been used to inform the map.</p> <p>Productive Woodland This section states that 'Proposals that combine native woodland creation with diverse conifer and/or productive native or non-native broadleaves would be encouraged where significant multiple objectives of the strategy are delivered in a landscape suitable location'. We would suggest changing 'in a landscape suitable location' to 'and if identified as an appropriate location once all potential constraints assessed'. Welcome the inclusion of bullet point 'The loss of open ground would not have a significant negative impact on priority habitat and species'. Welcome inclusion of the statement – 'The introduction of non-native seed sources into upland open habitats, riparian zones, adjacent native woodland or designated sites must be considered and detail of management to prevent establishment of non-native trees in these sensitive areas should accompany any woodland creation proposal'.</p>
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
	<p>Montane woodland Agree with how important it is but my understanding is that there is no grant from FS for the creation of this. This would be legitimate request in any uplift negotiations being undertaken for the National Park.</p> <p>Priority Woodland Habitats and Flagship Species Atlantic Oak woodland should be just Atlantic Woodland because it encompasses birch, hazel, ash and even pine woodlands. As this woodland type is so important and special as described in The state of Scotland's rainforest report published by Woodland Trust, April 2019 https://www.woodlandtrust.org.uk/mediafile/100825110/state-of-scotlands-rainforests.pdf?cb=5fa301d991f34f46a5ca752aa757f62f , this strategy rightfully claims it to be a high priority for the National Park. However, there is no uplift in grant to establish new Atlantic woodland or help maintain the existing woodlands, which are suffering from over grazing, INNS, disease, climate change and been planted up with exotic conifers as listed in the Executive Summary of this report. Indeed there should be an uplift for all native woodland creation and enhancement because it has been identified as a High Priority for the NP.</p> <p>Pearl Bordered Fritillary should be lower case – pearl bordered fritillary. Black Grouse – 'Black grouse are a priority UK Biodiversity Action Plan species, and on the red list of Birds of Conservation Concern due to significant declines in between the last two national surveys (1995 and 2005)'. Suggest changing slightly to simplify message 'due to significant declines over the past 25 years in parts of the UK'. Black grouse are widely distributed across the National Park although at low numbers. – suggest this is changed to '...although at low numbers, with some areas being critically low'. 'the Great Trossachs National Nature Reserve' should read 'The Great Trossachs Forest National Nature Reserve'. Other Notable Species – We welcome the inclusion of this section.</p>

Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>Designated Sites Appendix 3 Loch Lomond SPA – with reference to Capercaillie – it was agreed in (I think) 2013 by SNH, NPA and RSPB that the population on the Loch Lomond islands was functionally extinct. Therefore, we would suggest the potential effects and mitigation requirements for proposals are extreme. However, should the fortunes of capercaillie in Scotland improve and their range expands south and west wards in the future then at that point these would be reasonable requests, but until that time these mitigation requirements would appear excessive and would not be required.</p> <p>Glen Etive and Glen Fyne SPA – this sentence is not clear in what it is asking– ‘All access routes must not pass within 1km of any nest site between February and August’.</p> <p>Open Ground Habitats Welcome the inclusion of this section</p> <p>Peatland Welcome the inclusion of this statement – ‘Where productive conifer on deep peat is being restructured, consideration of peatland restoration or creation of bog woodland would be encouraged in line with current guidance’. However, we suggest that this statement is strengthened to include where hydrologically and ecologically possible restoration to peatland should be the primary aim, where this is not possible then wet woodland creation should be encouraged.</p> <p>Wild Deer Effective herbivore control can improve the condition of native woodland, aid the establishment of diverse conifer restocks and help mitigate the risk of vehicle collisions with deer. Suggest changing this sentence slightly to encompass woodland creation and restocking more broadly, such as ‘improve the condition of native woodland, aid the establishment of new woodland and restocking and...’</p> <p>Agricultural Land Management We recognise the role woodland can play in agricultural settings, for example providing shelter belts. However, it must highlighted in this section that even small scale planting could be detrimental to breeding waders in particular on the Strath floors. For example, in Glen Fruin, small blocks of woodland were planted on the valley floor for gamebird management and as a result has contributed to the demise of breeding waders in this glen. These key areas could be identified in the National Park and classed as sensitive, eg Glen Dochart.</p>
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>Consultation and Stakeholder Engagement ‘It would be expected that Community Councils, Deer Management Groups and the Fisheries Trust are included where relevant’. Relevant NGO’s should be added to these examples, as much local knowledge can be held by these groups.</p>
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Comments</i>	n/a

Organisation	Saving Scotland's Red Squirrels
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
<i>Additional Text</i>	I am fully in support of the vision, particularly for the range of woodland species to be diversified and broadened, however take really needs to be taken in the species placement so that it does not create more favourable routes for mammalian invasive non-native species. i.e. Grey squirrels.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	No
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No
<i>Additional Text</i>	It may need to be highlighted at some point that controlling invasive species is not just plants. Appreciate the inclusion of red squirrels as indicator species for productive conifer forests.
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	No
<i>Additional Text</i>	With productive broadleaves care also needs to be taken in choosing locations so they do not encourage mammalian invasive non-native species into new areas.
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	As with woodland habitat networks, riparian woodland networks need to take into consideration their potential as routes for invasive non-native species.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Comments</i>	n/a

Organisation	Scottish Campaign for National Parks
Do you agree with the vision?	Mostly
Is there anything you would change about the vision?	Yes
	<p>SCNP welcomes the aspirational character of the draft Vision and especially its ambition to create “a strengthened native woodland habitat network across the National Park at all scales”. As it stands, however, the Vision is very much a “motherhood and apple pie” statement, which fails to recognise and engage with the realities of current woodland cover within the Park and with the challenges that arise from the discrepancy between the condition and management of many of its existing forests and the standards and ideals that are appropriate in a National Park.</p> <p>This shortcoming is evident, for example, in the failure to acknowledge explicitly in the Vision the extent of current conifer afforestation in the Park and to set out a goal for the future evolution of these ‘commercial forests’. This is not just a matter of considering the scope for replacing alien species with trees native to the area but also – and quite possibly far more extensively - of creating forest environments that approximate much more closely to natural woodland ecosystems, irrespective of the precise tree types involved. These latter are much more likely to offer the diverse range of “wider benefits” rightly sought in the Vision, including many (such as landscape, amenity and recreational ones) that it does not specifically mention but which are fundamental to National Park purposes. From this standpoint the modest guidelines set out in the UK Forestry Standard (UKFS) and cited in Section 4 of the Strategy are a bare minimum, inadequate to the proper ambitions of a National Park. Such aspirations in relation to forestry and woodlands should also extend more widely, both to trees more generally (for example to hedgerow trees in the Park’s farmed landscapes and trees of amenity value in settlements) and to overall land use. At a time when for a host of reasons Scotland faces the prospect of far-reaching changes on land use, National Parks should be setting the standard for high quality, better integrated management of both land and water. They should be blazing the trail in involving all sectors and interests in discussions about potential scenarios, with a view to identifying and pursuing the most widely beneficial outcome, and helping individuals and organisations on the ground to find innovative solutions to what are often complex problems.</p>
Do you agree with the objectives and rationale?	Mostly
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	<p>The overall approach is framed against a number of government programmes and targets rather than national park purposes. The content covered is much the same but it underplays, for instance the importance of, and economic benefits arising from, the public’s enjoyment and understanding of the National Park’s special qualities.</p> <p>All development in National Parks should be a showcase for high quality and sympathetic land uses, management practices and developments. The current ‘forest’ portfolio falls well below expected standards across much of the National Park. SCNP recognises there is an aspiration in this strategy to improve what is currently there. It remains to be seen whether the new structure of forestry in Scotland will ensure that even the clear if modest additional requirements for forests in national parks set out in the UKFS are delivered.</p> <p>SCNP supports the aspiration for more native woodland within the National Park where that meets the conservation objectives. New native woodland expansion, other than that around communities, should be limited to those areas identified as having medium-high or high capacity in the Landscape Capacity Study (21 of the 31 landscape sub zones) which provides ample scope to achieve the additional 2,000 hectares of woodland expansion identified in the strategy. We would like to see clear targets for how much of existing conifer plantations should be converted to native woodland on re-planting and priority areas identified for this. More specifically, we would like to see ambitious conversion targets set for areas where there is very little native woodland at present. For example, Cowal is at present predominantly covered with conifer forest which creates a hole in the native woodland network: the Strategy should be setting out plans to link the Atlantic Oakwoods further West with those of Lochlomondside.</p> <p>SCNP is not supportive of further productive conifer planting within the National Park unless there is high landscape capacity for this type of planting, it exceeds UKFS requirements for national parks and where clear multi-purpose benefits accrue. We would like to see any new conifer planting offset by further native woodland creation, over and above that already agreed in Forest Plans.</p> <p>SCNP is supportive of improving the condition of existing woodlands and diversifying woodland management. For this to happen, there will need to be a radical change in the way forests are currently managed. We would like to see the Strategy set out how this will be achieved</p> <p>SCNP is supportive of protecting and enhancing the landscape and of the principles of good design set out in Objective 3. There is however very little in the Strategy about how the</p>

	<p>adverse impacts of forestry plantations in the National Park at present will be addressed. SCNP is supportive of the principles of focussing on generating economic benefits for the local economy through the processing and use of wood resources close to source as set out in Objective 4. Again, for this to happen, there will need to be a radical change in the way forests are currently managed. We would like to see the Strategy set out how this will be achieved</p> <p>SCNP is supportive of an integrated approach to land management, including forestry as set out in Objective 5. We believe the implication is that the National Park will need to develop an all encompassing Regional Land Use Framework, hopefully as a contribution to a nationwide effort to translate the principles embodied in the national Land Use Strategy into practical guidance that can inform both individuals' decision-making and the targeting of future public advice and financial incentives.</p> <p>SCNP is supportive of greater community engagement in the planning, management and ownership of woodlands within the National Park as set in Objective 6. This needs to include not just local communities, which in many parts of the National Park are tiny, but also communities of interest. SCNP is supportive of the potential of well-designed woodland and forests to support recreation and enhance health and well-being. SCNP feels that the economic benefits of recreation to the local economy should be strengthened in Objective 7. SCNP supports the educational benefits of woodlands and particularly the role that woodlands and forests in national parks can play in demonstrating best practice in woodland and forest management to a national and international audience.</p>
Do you agree with the management of existing woodland sections?	Partially
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>SCNP is supportive of the improved management of existing woodlands. The problem with the Strategy at present, however, is after setting out the Vision its written in the form of Guidance rather than a plan setting out how the vision will be achieved.</p> <p>SCNP feels there is greater scope to improve existing productive conifer plantations by including, as part of extending economic opportunities, the benefits accruing from enhanced recreation provision and improved health and well-being which accrues from increased outdoor activity.</p>
Do you agree with the targeting woodland creation section?	Partially
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	<p>SCNP is supportive of the principles for the targeting of native woodland creation as set out in the strategy. What needs to be added to this are clear proposals for the conversion of existing conifer plantations to native woodland building on the information already contained within existing forest plans. SCNP is supportive of the principles for the targeting of productive broadleaf creation as set out in the strategy but again would like to see plans for the conversion of existing conifer plantations.</p> <p>SCNP is not supportive of the creation of productive conifer plantation with the landscape capability bar set so low at medium. In the description of medium landscape capability it identifies that at this level the landscape is 'quite vulnerable'. SCNP believes it is not acceptable to plant productive conifer plantation, with all the implications of scale, infrastructure and intensity that goes with that label, on vulnerable landscapes when the targets for additional woodland creation can easily be met through other means. On the 29th May 2019 the Cabinet Secretary for Rural Affairs, in the context of land for new entrant farmers, went on record as saying:</p> <p>"The availability of land remains one of the primary barriers to attracting new entrants to farming and I am clear that overcoming these challenges is vital for the future sustainability of the industry.</p> <p>"We have to plant trees in the right place and we need to respect and protect farmland for mixed livestock production.</p> <p>"We have a very, very large landmass in Scotland. There's plenty of room, plenty of land to achieve successful forestry and farming. That's really what we aim to do."</p> <p>SCNP notes that it is hard to disagree with the Cabinet Secretary's observation that Scotland has enough land to accommodate a wide range of different uses and activities. With due care, many of these can co-exist over the same area, with the fundamental challenge always being to identify and find ways of delivering the mix of uses that optimises the benefit to society as a whole. National Parks should be at the forefront of this quest and should exemplify the best in forest and woodland practice and in the integration of forestry with other land and water uses</p>

Do you agree with the strategy guidance on habitat enhancement?	Mostly
Is there anything you would change about this guidance?	Yes
	<p>SCNP is generally supportive of the guidance suggested in the strategy for habitat enhancement. Its guidance, however, and not a plan for how habitats will be enhanced and therefore depends on the co-operation of landowners to do the right thing. The history of forest management since the creation of the National Park does not inspire confidence that this will happen except in very limited areas without a clear plan</p> <p>SCNP feels greater emphasis should be given to the restructuring of existing productive conifer woodland which is largely of poor design quality. It is much less of an asset to the National Park than it should be. Very little of it is truly multi-purpose and as a consequence much of its value is delivered to the wider Scottish economy rather than the local economy. Much of the suitable land for productive forestry within the Park area (and quite a bit on unsuitable land) is already planted and improvements to these areas will have a disproportionate effect on the overall quality of woodland within the Park.</p> <p>SCNP feels the wildlife tourism benefits of habitat enhancement as set out in the strategy could be strengthened.</p> <p>While there is reference to natural regeneration being the preferred method of woodland expansion around areas of native forest (e.g. Glen Falloch pinewoods), the strategy includes no provision for how this will be achieved. Historically, the native pinewood in the Park has failed to regenerate due to overgrazing and is only recovering now due to it being fenced. We would like to see the Strategy making specific commitments and proposals for how these native pinewoods will be expanded through natural regeneration. We would also like to see a commitment being made to identify other areas for natural regeneration – e.g the western flanks of Ben Lomond and surrounding hills, above the existing native woodlands, could be an obvious place to start.</p>
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Partially
Is there anything you would change about this guidance?	Yes
	<p>SCNP recognises there are some benefits in the use of landscape zones and sub zones to maintain character within sub zones and heterogeneity between them.</p> <p>SCNP notes the limitations of the current toolkit including those recognised in the strategy. The toolkit must include views from the higher tops and more distant vistas if it is to produce a balanced view of landscape capability.</p> <p>SCNP feels the principle of the toolkit is helpful but that the specific details of the toolkit should be tested more thoroughly with local communities and visitors to the area if it is to be truly useful in helping to gain agreement on the creation of new woodland.</p> <p>SCNP has concerns that the toolkit appears to take the presence of existing productive conifer woodland as a green light to plant more alongside or to join up current forestry blocks. The remodelling of existing forestry blocks to meet UKFS guidelines may well result in these blocks themselves becoming more fragmented and therefore a presumption of expansion and joining up may be based on a false premise.</p> <p>SCNP notes the challenges that productive conifer forest faces in meeting the description of the role of woodlands in the landscape as set out in the narrative to the section “ Woodlands define the lower and mid glen slopes and distinguish them from the open uplands. They enclose settlements and clothe loch shores and islands. They are important visually, bringing a tapestry of texture and colour that changes throughout the year.” The understandable response to tree disease, with the reduction of species available for planting, makes the achievement of this vision through productive conifer forests almost impossible.</p>

Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Mostly
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>Once again, this Section sets out guidance, rather than presenting a plan designed to achieve the Vision set out in the Strategy.</p> <p>SCNP is supportive of the recognition of other designations within the park area and the need to avoid negative impact on them</p> <p>SCNP is supportive of the intention to restore as far as possible the damage done by insensitive planting in the past but would like to see more specific proposals for remedying this.</p> <p>SCNP is particularly supportive of reducing the impact of deer fencing and its removal once it is no longer essential for the establishment of the young trees. But for this to happen, there must be proper plans in place to reduce deer numbers.</p> <p>SCNP is supportive of the principles of lower intensity woodland with grazing of the understorey at ecologically sustainable levels.</p> <p>SCNP welcomes the recognition that the presumed soil and water benefits accruing from woodland creation only occur through careful planning and ongoing management. A poorly designed woodland, forest road, or felling operation could increase rather than decrease the risks to water quality and flooding. SCNP notes that humans have a history of getting decisions about where to plant trees badly wrong; this reinforces the argument that the National Park should identify a number of areas for natural regeneration and letting natural processes determine what happens.</p>
Do you agree with the strategy guidance on social and rural economic development?	Mostly
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>SCNP does not feel that the purpose of trees and woodland in a National Park should be to support a processing industry located across Scotland and Northern England. SCNP feels much greater emphasis should be given to ongoing management of woodland that supports viable year-round employment within the local economy. The current approach, harshly summarised by some as a cycle of plant, fence, forget and fell, encourages large scale blocks of woodland, an itinerant work force, excessive travel and haulage and much of the real value being delivered elsewhere.</p> <p>SCNP strongly supports initiatives which promote the many and varied roles associated with woodlands (and indeed agriculture more widely) and the huge range of skill sets and opportunities for year round fulfilling employment that this can produce.</p> <p>SCNP feels much can be learned from mainland Europe where woodland management generally and foresters specifically are held in much higher esteem.</p> <p>SCNP feels that the blocks of conifers isolated from easy extraction are prime candidates for naturalistic management rather than forced extraction. They serve as a useful reminder of the huge amount of foresight needed to be get the planning of productive conifer forest right when you are planting a crop which is unlikely to be harvested in your working life.</p> <p>SCNP welcomes greater community engagement and community ownership of woodland. Engagement needs to be ongoing and is made easier if woodland management is a year round activity within an locality and not a stop start process that few can remember the earlier stages of.</p>
Do you agree with the strategy guidance on woodlands and people?	Partially
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>SCNP welcomes the recognition that one of the primary purposes of National Parks (recreation and enjoyment) is compatible with high quality woodland at many scales.</p> <p>SCNP feels the role that well designed woodland can play in increasing the carrying capacity of the landscape for recreation is not emphasised enough. But we would like to point out that realising this potential requires investment in new recreational infrastructure, for example, huts, campsites, mountain bike trails, and footpaths. The strategy as it stands contains no indication as to where such infrastructure is needed. SCNP feels that once the economic benefits of health and well-being arising from a cultural shift to a an outdoor culture (which National Parks are well suited to lead on) have been properly taken on board, the economic value of woodlands and the definition of 'productive' will look very different from the current value of timber-based assessment. As an example of what is needed, a proper recreational plan for Cowal could see a lot new recreational infrastructure within restructured forests and help form the basis of economic regeneration across the peninsula.</p>

<p>Additional Comments</p>	<p>The Scottish Campaign for National Parks (SCNP) is dedicated to the cause of existing and future national parks in Scotland and is the only national voluntary sector body for this purpose.</p> <p>The SCNP works with Scottish Environment LINK, the umbrella organisation for most environmental bodies in Scotland and has particularly close working links the Association for the Protection of Rural Scotland (APRS), Ramblers Scotland, Friends of Loch Lomond and the Trossachs and the Cairngorms Campaign.</p> <p>SCNP's aims include:</p> <ul style="list-style-type: none"> • To protect the established National Parks • To increase awareness of the parks and their importance to communities across Scotland and further afield • To protect outstanding areas that are appropriate for designation as National Parks or are of sufficient merit to warrant special protection • To lead and strengthen the National Park movement in Scotland <p>To achieve these aims we:</p> <ul style="list-style-type: none"> • Seek to influence government and government departments by responding to policy consultations • Meet with the existing Parks, SNH and the Minister for the Environment on a regular basis to discuss matters of mutual interest • Challenge bad practice • Work with others to bring the widest possible experience to bear on National Park issues. <p>Introduction</p> <p>SCNP welcomes the consultation exercise and the supporting materials which we believe are a positive start towards the development of an evidence based forest strategy . To be truly effective as a strategy, however, we believe that it needs not only to set out a broad goal and some guidance to be observed in pursuing it but to map out much more clearly a route for getting from where we are now to that desired destination.</p> <p>SCNP does not feel that a mandatory binary agree/disagree assessment is appropriate for complex questions.</p> <p>If SCNP is forced to make a binary choice we would feel it necessary to say that we do not agree with any of the headline questions which is a more negative response than we feel reflects our overall view.</p> <p>SCNP responses are applicable to all national parks (and potential national parks) in Scotland though with specific LL&TNP references for this consultation.</p> <p>SCNP feels the term 'productive' as used in the report is too narrow and is predicated on a view of how Scottish forests are currently managed. Many of the forests in the Lake District national park, for example, generate far more income from tourism than trees despite remaining productive in pure forestry terms. Little consideration is given to the possibility of testing the concept of continuous tree cover forestry which has sustained benefits for water quality, flood prevention, carbon storage and a lower peak but much extended harvesting period which lends itself much more to retain this economic value in the local economy.</p> <p>SCNP feels strongly that National Parks are uniquely placed to develop and implement a fully integrated land use strategy with appropriate incentives, checks and balances which cross traditional departmental boundaries. The draft Forest Strategy does point to the links with other forms of land-use (e.g the impact that red deer have on trees) but does not then set out what will be done to reconcile the conflicts between existing land-uses</p>
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Organisation	Scottish Land and Estates
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
	We welcome the parks focus on native woodland habitat in its vision for the trees, woodland and forests of LLTNP. We would, however, encourage the park to make greater reference to commercial forestry beyond the reference to "locally sourced timber". It must be recognised that commercial forestry has shaped the park and is an integral part of the landscape which attracts so many visitors. Commercial forestry, which can include native species, offers employment opportunities and contributes to the local economy. 75% of all LLTNP woodland are productive conifers which supports the forest management and timber processing industry within and outside the park. Commercial forestry also delivers recreation and tourism opportunities.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	We agree with the objectives and rationale but would like some clarification. We are happy with the rationale and the references to both productive and amenity woodland.
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No
<i>Additional Text</i>	SLE agree that the management of existing woodland has a key role in delivering the objectives of the parks strategy. We support the ambition to create and maintain resilient woodlands and forests. Infrastructure remains a key issue in delivering productive planting and will be a barrier to achieving planting targets both nationally and within the park.
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	No
<i>Additional Text</i>	The Landscape Capacity Study is a welcome resource in helping land managers identify opportunities for woodland creation. SLE welcome the information on key points that would be favourable in a productive conifer proposal. We would encourage this information to be more widely available. The use of mapping to show areas where native woodland creation would be preferred, has potential or limited capacity is exactly what land managers need to help them create a woodland proposal that is most likely to succeed. We welcome the clear effort of the park to communicate its targets and priorities for woodland creation of all types and would encourage greater transparency and openness around decision making to encourage land managers to explore woodland creation. For the park to achieve its planting targets for woodland creation it will need to work with land managers to support and guide them in their planting proposals. Increased awareness of targets and priorities will help guide landowners and should result in better targeted proposals.
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	SLE is very supportive of the parks plans for habitat enhancement. Encouraging habitat expansion and wildlife corridors through woodland creation and management is something we also encourage as part of the WES initiative. WES aims to promote the best habitat and wildlife management practices. The use of a landscape scale approach is also something we support. We welcome the landscape scale approach detailed throughout the draft strategy but would like to see more detail on how land manager cooperation will be encouraged and facilitated.

Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	As said in previous answer SLE welcome the landscape capacity study and agree that the special landscape qualities of LLTNP should be considered in all future plans for woodland management and expansion. The landscape toolkit is another valuable resource in improving the suitability of proposals. We would agree that the landscape capacity study should in no way remove the requirement for site specific assessments for woodland proposals. However, we would also encourage the park to be upfront with its targets and priorities by providing as much detailed information as possible to land managers. Greater openness and communication will generate more suitable proposals for planting with a higher chance of success.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	SLE agree with the strategy guidance. We welcome the commitment to not plant on deep peat and the use of recommended guidance when considering the restructuring of existing conifers on deep peat. We agree that better quality lower agricultural land should be maintained and support the use of targeted riparian planting to encourage improved soil and water management. SLE also support the use of livestock introduction within established native woodland to improve woodland condition and expand available grazing.
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	SLE agree there is a need to ensure land managers within the park are able to access qualified and competent contractors to deliver forestry management. This requirement also extends to the skills and knowledge of planning and woodland officers. Support must be available to ensure all the people involved in drafting, approving and managing a proposal have the appropriate skills and knowledge to make correct decisions. We also support the use of knowledge exchange and peer to peer learning to help increase skill levels. It is right to encourage greater support for local timber supply and biomass production. As mentioned in a previous answer we support the early consideration of forestry infrastructure and would encourage increased cooperation when planning woodland creation. We welcome support for community-based, small scale tree planting. We agree that consultations in relation to forestry proposals is established practice and as a valuable tool when building relationships. It is however important manage the expectations of those being consulted. We encourage the use of landscape scale proposals so fully agree with the use of stakeholder engagement forums and land use partnerships.
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	We agree with the guidance on woodlands and people, We would encourage the park to consider the education opportunity that improved access can provide. It is important that visitors to woodlands understand what responsible access means and land managers should also communicate, possibly by way of sympathetically placed information boards, what the woodland or forest is delivering for the public and natural environment.
Additional Comments	n/a

Organisation	SNH
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	There is a recognition of the CRtB and ATR but it would be good to include mention of the potential of the Park to assist communities in the process. It is discussed further in the strategy but it would be good to make reference in this section also.
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	It would be good to describe generally what level of 'management of herbivore impacts to sustainable levels' would be in practice... for natural woodlands including natural regen with a diverse ground flora and scrub layer and in the case of productive conifer forests it should be at the top of this section as this would assist in meeting the additional objectives in this section.
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	It would be good to include a layer of existing native woodland on the map on page 23 for context for the potential new native woodland sites.
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Montane woodland and montane scrub enhancement could focus on protected areas where this is a notified feature or qualifying interest. Appendix 3 discounts this on some of these sites but there is potential to improve this habitat without impacting on others, NVC's will provide information on where this would be possible. the management of herbivores is critical for this habitat, fencing large exclosures that would enable successful montane woodland and scrub enhancement would have significant negative impacts on the landscape and visual amenity of the park. Other notable species should include FWPM. With respect to INNS we acknowledge the Park Authority's efforts in this work stream and significant efforts made with us and other partners to eradicate INNS on a landscape scale.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Comments</i>	We are supportive of the strategy and emphasise early engagement with ourselves is key if woodland creation/existing woodland management would impact on any protected area or species.

Organisation	Tilhill
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
<i>Additional Text</i>	Yes but....The strategies focus appears to be on intangible benefits of Woodlands and Forests rather than the tangible contribution, role, opportunities and challenges sustainable management of all woodland, including productive forests, economically & environmentally can bring. Productive conifers make up the largest proportion of the Park's woodland cover and the multiple benefits that they provide environmentally, economically and socially is not being given due consideration or recognition in the Strategy.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	Yes but.... A primary objective must be carbon sequestration within the National Parks area. Leading from that must be the promotion of sustainable productive conifer forests (with open ground and broadleaved components) which have an important role in combating climate change, allowing high Carbon sequestration, and creating a utilisable, renewable resource. Sustainable commercial forestry is one of the few profitable land uses and creates massive supply-chain economic benefits. It is already present in the National Park and the benefits it brings visually and for public access is much appreciated by the general public - albeit there needs to be education regarding the benefits arising from harvesting and restocking. The overarching objective should be the right tree in the right place for the right reason, and there should be no prejudice as to whether a tree is native/non native/conifer or broadleaved.
Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	Whilst Native and Productive Conifer Forests can be managed in different ways there should be an acknowledgement that they are often part of the same management unit and that often the native woodland component of a productive conifer forest benefits from the economically sustainable management of the crop trees - deer control/invasive species control and improved access for example. Specifically within the productive woodlands the legitimacy of clearfell and restock should be acknowledged. Low Impact Silvicultural Systems have a limited role within the National Park given the climate and soils. It is proposed that a gap analysis is required plus an impact assessment to fully understand the implications and impact of introducing such policies, however collaboration with practitioners will identify where LISS is appropriate and where commercial forestry is acceptable, or not.
Do you agree with the targeting woodland creation section?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	I am not sure why the National Park cannot embrace sustainable commercial conifer forestry with equal importance to native woodland creation, given that productive forests have been such an important feature in the park area since before its inception. A National Park can surely be (and should be) an exemplar of land management (environmental/economic and social) and not limit itself to become less diverse and less economically sustainable than it is currently. Woodland creation should focus on the right tree in the right place for the right reason, and there should be no prejudice as to whether a tree is native/non native/conifer or broadleaved.
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The statement on habitat networks spreading non-native invasive species is questionable? Creation of woodland native or productive is not likely to spread most non-native invasive species. However, it should be acknowledged that suitable conifer woodland can be used to create a barrier to spread of some invasive species. For example the importance of the well managed productive conifer forests (with their associated broadleaved components) in Argyll and in the National Park, which are not favoured by and appear to provide a barrier to, Grey Squirrels help to protect and provide habitat for red squirrels.

Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Excellent tool kit and is realistic about potential for woodland creation. Although having a guide map for areas that favour productive conifer woodland creation may also be beneficial although it might tend to be too prescriptive. The tool kit should allow for discretion and creativity in developing bespoke design solutions rather than be too prescriptive.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	There is a real risk of limiting beneficial and balanced woodland creation by being over prescriptive and having too many constraints and barriers. For example protecting significant areas of deep peat is important both for biodiversity and carbon balance. Protecting smaller pockets of deep peat, even when linked in a matrix can make woodland creation unviable, even if on balance woodland creation could provide more carbon sequestration, diversity, economic and social benefits than are provided by the small areas of deep peat. There needs to be better unbiased analysis and guidance of the overall costs and benefits of woodland creation to better inform achieving all the benefits that can come from all sorts of woodland creation. Also the integration suggested could limit opportunities which are driven by future social or environmental changes (such as a reduction in farm subsidies or the impacts of climate change). The future does not have to be the past.
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Yes but....Current productive, plantation conifer forestry does significantly contribute to the rural economy although there is always room for improvement - both in recognising what benefits it already brings to the National Park area but also what more it can do. Has it's contribution been assessed, including Ecosystem Services? Have the intended changes arising from implementing this strategy been compared? It is not evident in the Strategy. Also, the value of forestry is in the supply chain, and value is added outside the Park - thus is there a disconnect between the reality and the perceived value of the timber industry? Ecosystem Services & Natural Capital accounting would allow meaningful comparisons between different land uses and the impact of possible changes. Forest roads and tracks and timber haulage appear to be seen as an unfortunate impact rather than what they generally are - and asset/opportunity. There are poor examples to learn from, but generally forest access to productive woodlands have created a network of walking, cycling, horse-riding opportunities which would otherwise never have been there. Where unavoidable, the use of fragile public roads for commercial timber haulage can also help to justify their improvement for all road users. all access infrastructure should be planned and integrated to benefit integrated land use and recreation - help to create assets not problems.
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The emphasis in this section appears to be on the right to take access but the Landowners rights should also be recognised. Land Reform allows for responsible public access to be taken and for responsible land management to be practiced, including consultation and discussion with stakeholders. This does not that landowners have to provide open access everywhere at all times for all forms of access users even when there is no significant demands. The Landowners legitimate interests for security, privacy and their and the publics safety should not be overridden by a minority of vociferous access takers. A better balance needs to be struck between informing stakeholders, consulting with them, engaging at a deeper level versus empowering them - a transparent process needs to be developed to set out expectations and guidance for both parties - see https://landcommission.gov.scot/lrrs/communityengagement/

Additional Comments	Although the strategy references why "forests" are not part of the title, it comes across that productive, commercial forests are not considered a significant asset to the Park and that the intended direction of travel within the Park is to maximise the intangible benefits of trees and woodlands as opposed to acknowledging the varied (environmental, economic and social benefits that all forests and woodlands have provided historically and can be expanded on in the future. It is a missed opportunity to gain consensus with the forest industry - who need to actively and positively engage with the strategy if it is to be delivered. In effect, the strategy needs to be more realistic about commercial productive forestry, it's drivers and constraints/opportunities and recognise that they will continue to play an important role in the Park and should not be diminished or ignored - as it appears to be in this document. A Natural Capital analysis of land use in the Park is surely overdue and would support rational policy changes and land use change decisions.
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Organisation	Trossachs Community Council
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	To include the native Scots pine in this document as it is at risk of extinction due to "renaturalising" with only deciduous trees.
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	think of the Scots pine in this document.
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	consider the scots pine in this plan
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Balance the development of second homes & tourist accommodation with the woodland. Take into account the villages in the Park and the effect of too much holiday accommodation on these, that is draining the lifeblood from them.
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Consider the needs of small villages and the people who live and work in the Park with the drive to increase tourist numbers. Too much tourist accommodation is causing villages to become unviable as populations. Too many cars on the narrow roads is not being taken into account with the drive to increase tourist numbers.
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Maintain a balance with maximising outdoor recreation with the people who live in the Park and struggle to get around due to clogged roads.
<i>Additional Comments</i>	Please consider the people who live and work in the Park as their needs are being ignored in the drive to get more tourists into the area, without consideration of the infrastructure and the negative impact of this influx.

Organisation	Woodland Trust
Do you agree with the vision?	No
Is there anything you would change about the vision?	Yes
<i>Additional Text</i>	<p>There is much within the draft vision we would agree with. However, it needs to be far more ambitious with regard to increasing native woodland cover within the Park and reducing the threats to native woodland, particularly over grazing and invasive non-native species (INNS). The vision can include wording such as: native woodland cover will have increased significantly, herbivores and INNS will have been managed to sustainable levels with visible benefits for nature. We would suggest adding the word 'protection' to the sentence: 'Careful woodland management and creation...' as a way for the vision to address some of the threats but also opportunities for trees and woodland in the Park.</p>
Do you agree with the objectives and rationale?	No
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	<p>While already included as part of some objectives below, we would like to see a specific objective around reducing the threats to existing and new native woodland, particularly from overgrazing and INNS. The sections on Implementing Objectives should be more specific and contain actions which can be taken to achieve the objectives.</p> <p>Increasing woodland cover: the overall target is set at 2,000ha, which should be revised in light of the declared climate emergency in Scotland. The recent Committee on Climate Change (CCC) UK report on net-zero greenhouse gas emissions recommends that Scotland sets a target to reach net zero greenhouse gas emissions by 2045, five years ahead of the rest of the UK due to Scotland's land use capacity, particularly around afforestation which can become a significant carbon sink. In line with the advice from the CCC, the Scottish Government has raised the targets in the current Climate Change Bill and it is expected that changes will be made to the Climate Change Plan which will see updated, more ambitious targets around afforestation. To address the climate emergency as well as the alarming biodiversity decline (http://www.scotlink.org/wp/files/documents/Scotlands_Nature_Red_Alert.pdf and https://www.ipbes.net/sites/default/files/downloads/spm_unedited_advance_for_posting_htn.pdf) action must be taken immediately by all of us to see afforestation, including tree planting and natural regeneration at a far greater scale than before in the UK. With this Strategy the National Park Authority has the opportunity to set ambitious afforestation targets. The Woodland Trust would like to see the 2,000 ha target increased significantly, and with a large percentage of that target to be native woodland creation. Within a National Park, which is a national asset and should be an exemplar of ecological best practice there should be a commitment for, by far, the majority of the woodland creation to be native. A specific native woodland creation target should be set in the final strategy to ensure consistency with the messaging that native woodland creation is a priority in the Park. Native woodland will help deliver the objectives of the National Park and as it is also lower in cover at the moment it should be explicitly prioritized, particularly as it can help in both the climate change and biodiversity crisis which are interlinked.</p> <p>Improving woodland condition and diversifying management: The rationale recognizes key constraints such as herbivore impact, INNS, woodland with limited species diversity and limited woodland management. In the section on implementing this objective it should be explicitly stated how the objective will be implemented through addressing the key constraints identified. The threats posed by these need to be taken seriously if they are to be addressed in an effective way. The Implementing Objective section should explicitly state that INNS should be addressed at catchment scale and eradication should prevent re-colonisation, and herbivores impacts will be reduced to allow for woodland condition to improve and for natural regeneration.</p> <p>Protecting and enhancing the landscape: we agreed with the appropriate siting and design of woodland as outlined here, however in this section on protecting the landscape character of the Park, inappropriate development affecting woodland in the Park and therefore the Park's iconic character should also be listed. In the implementation section for this objective it should say that this strategy will be implemented alongside the Local Development Plan and inappropriate development will be resisted.</p> <p>Maintaining and enhancing economic sustainability through skills and business development: we welcome the recognition that new woodland and improved management of existing ones can provide new income streams while also providing other benefits.</p> <p>Promoting cooperative woodland management and creation as part of an integrated land management approach: In the strategy we would like to see considered any mechanisms through which farms and estates can receive advice on woodland integration on their land. For example, advice offered by Park staff to landowners but also other organisations, such as the Woodland Trust, which offer woodland surveys and advice to landowners.</p> <p>In the final strategy we want to see further detail on Land Use Partnerships, in line with outcome 4 of the Partnership Plan and a statement on how the park authority can facilitate these in line with the Scottish Government's Land Use Strategy. We note the following commitment in relation to outcome 4 'We wish to lead the way to help deliver this action by establishing and facilitating new Land Use Partnerships in the National Park. These will operate at landscape-scale and across land ownerships in order to deliver better stewardship of land and water across public and private land, and involve local communities. We will also support the aims and objectives of the Callander Landscape Partnership to provide multiple benefits for nature and people.'</p> <p>We appreciate that this section focuses on the objectives and the rationale for these. In our response above we also suggested that the strategy should have a clear pathway to how the objectives will be achieved. At the moment this draft strategy document is lacking in</p>
	<p>response above we also suggested that the strategy should have a clear pathway to how the objectives will be achieved. At the moment this draft strategy document is lacking in</p>

	actions.
Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	We cannot fully support this section due to lack of clarity and action around: encouraging natural regeneration, strategically addressing INNS and restoration of plantations on ancient woodland sites (PAWS). For the native woodland section, there should be a provision for woodland management interventions to be implemented at landscape scale and involve reductions of herbivore impacts to levels where native woodland can regenerate both inside designated sites and outside them. Invasive species control programmes should be designed and implemented at catchment scale to prevent re-colonisation from remaining uncontrolled areas. Some of the actions proposed above can help for woodland We welcome the focus on ancient woodlands particularly as these are recognised as delivering most for biodiversity according to the Forestry Strategy for Scotland 2019-29. In addition, as part of management for ancient woodland, it should be an objective of the National Park that there will be no further loss of ancient woodland and ancient and veteran trees with the recognition that inappropriate development and herbivores pose the greatest threats to remaining ancient woodland. In addition, this section should say that PAWS and historic ancient woodland planted with, or colonized by exotic conifers, should be restored to native woodland. There should be a recognition that exotic conifers can act as INNS when seeding onto native and ancient woodland sites. On the productive conifer section, we would like to see that in order to deliver the listed requirements UKWAS certification should be actively promoted.
Do you agree with the targeting woodland creation section?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	The section should list a percentage/ no. of hectares of native woodland expansion. In line with recent policy developments and the Scottish Government's progress on the current Climate Change Bill which is under scrutiny by the Scottish Parliament, the 2,000ha target should be significantly increased as afforestation has received particular mention as one of the ways in which reaching net-zero greenhouse gas emissions can be met. Woodland expansion through native woodland regeneration should be prioritised and incentivised in the National Park, with clear targets. There should be at least a 90% to 10% split with the larger part being native woodland due to benefits this offers and support for delivering the objectives and outcomes of the Park. These targets should be clearly presented in the final strategy. We are also wondering if there is data available from Scottish Forestry on what percentage of the total land area/how many hectares are the areas of opportunity as presented on the map on page 23. Such an assessment can help inform future targets for woodland creation in the Park.

Do you agree with the strategy guidance on habitat enhancement?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>We provide further comments on this section in our answer below. This guidance is very welcome and we hope that it will be of use to landowners and managers. It's critical that at the same time that we are considering the continuous maintenance and enhancement of the existing woodlands. The specific actions to be taken in relation to the proposed habitat enhancement should be clearly presented in the design of the final strategy. Perhaps the National Park Authority can also identify specific partners and programs which can support the delivery of these actions, such as the Atlantic Woodland Alliance.</p> <p>We very much welcome the guidance on woodland habitat networks, particularly as this encourages habitat connectivity, and is in line with rural development ambitions as outlined in the National Planning Framework 3 on a national ecological network:</p> <p>'4.19 Scotland's rural areas provide many of our natural resources, and help to sustain the ecosystem services upon which our quality of life depends. Scotland's 2020 Challenge for Biodiversity aims to develop a national ecological network over time, and there is an opportunity to link this with green networks in and around our towns and cities. Benefits will be achieved by taking a long-term, strategic approach to environmental management and enhancement. A landscape-scale approach to environmental planning and management should address the decline in some ecosystem services by prioritising action across river catchments, as well as in and around our towns and cities. This can play a long-term role in sustaining diversity and delivering multiple benefits, not only for wildlife but also by providing sustainable food, fibre and fuel.'</p> <p>The approach presented in this draft strategy can be part of the wider ambition to deliver on a national ecological network, towards which there are already programmes making a contribution such as the Atlantic Woodland Alliance.</p> <p>We also agree with the riparian and montane woodland sections, and want to see the actions towards the priorities clearly distinguished in the final strategy.</p> <p>We have the following comments on the priority habitats and flagship species section:</p> <p>Atlantic oak woodlands: the Woodland Trust advises that we refer to this habitat as Atlantic woodlands, or temperate rainforest, and not limit this to the oak species found within these woods. This section should make reference to the Atlantic Woodland Alliance and the State of Scotland's Rainforest Report (https://www.woodlandtrust.org.uk/publications/2019/05/state-of-scotlands-rainforest/) in order to raise awareness about this landscape-scale project and encourage landowners and managers to engage with this project. It should also go further in stating how the National Park is working with the Atlantic Woodland Alliance to address the concerns in the report it produced and work towards delivering the strategy for Saving Scotland's Rainforest.</p> <p>Ancient woodland and trees: On ancient trees we encourage that the National Park authority and landowners use the Ancient Tree Inventory available at: https://ati.woodlandtrust.org.uk/ in order to record and identify the location of ancient and veteran trees within the park. As the map for the area shows there are areas which are ancient tree hotspots. The park should actively encourage more recording of ancient trees to help inform their management and protection. These areas, alongside ancient woodland areas, and areas of high nature conservation value should be protected and enhanced. The final strategy should also make reference to the protection of these sites from the impacts of inappropriate development. We are aware of areas of ancient woodland within the Park which are under threat from development and believe that it should be made clear to developers that such areas are not available for development. While this is a policy in the Park's Local Development Plan, this should also be stated in this strategy in order to link the two documents.</p> <p>PAWS section: This section should say that all PAWS should be under restoration.</p> <p>INNS section: we welcome the focus on working across the landscape and with all stakeholders and on post clearing restoration. We would like to see the National Park doing more on raising awareness about this as an issue within the Park, asking for support from local communities and individual households. This is especially relevant for rhododendron. Resources should be allocated to deal with this and programmes of volunteering as well as paid staff can work to deliver progress in addressing this important issue.</p> <p>Climate change and tree health: we agree and support this section and would like to see the final strategy develop on the proposal listed in this draft document to raise public awareness of plant health issues and encourage reporting and responsible behaviour to minimize risk. It is acknowledged that ash dieback is well established in the Park, therefore, resources should be allocated in order to manage this. An additional action plan could be prepared on how ash dieback will be managed, what resources will be allocated and how trees lost from the landscape will be replaced and what species are best to replace the biodiversity value of ash.</p> <p>The National Park could actively promote the citizen science project which monitors tree health Observatree https://www.observatree.org.uk/ as a way to monitor threats across the Park and help target action. Other opportunities for volunteering can be developed within the Park to help monitoring and action, for example around woodland condition and grazing pressure.</p> <p>The relationship of trees with climate change goes beyond tree health: while the ability of trees to capture carbon is acknowledged in this draft, it should also be better recognised that trees and woodlands, particularly ancient and veteran trees and native and ancient woodlands, are of high nature conservation value and are very biodiverse. Ensuring woodlands are in good condition for biodiversity is critical to build resilience to support adaptation of native woodland species to climate change. The climate change and ecological crises are interlinked.</p>

Do you agree with the strategy guidance on landscape integration and special landscape qualities?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	This section should be explicit about landscape scale change where this can restore and enhance ecological function and connectivity. From the point of view of native woodland creation this is very important in that it will allow better, more connected woodlands, which can in turn be better habitats for a variety of species. Such woodlands, which are some of the most bio-diverse habitats, will give our species dependent on this habitat, the best chance to adapt to climate change. For example, the Rest and Be Thankful area is known for frequent landslides which are affecting the traffic in the area and require expensive fencing. Assessments should be made for impact of afforestation with native species to help with soil erosion and landslides in the area, as well as increase the biodiversity in the area over time.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>We are unclear as to why wild deer are considered as another land use in itself within this section. While the impacts of wild deer need to be addressed with urgency, considering them a separate land-use will not help with the integration of wild deer management within wider land-use objectives, the outcomes of this strategy and the wider National Park outcomes.</p> <p>This document does not go into enough detail on herbivore pressures and the National Park Authority should be more challenging of landowners who allow overgrazing to continue to undermine the state of our woodlands and their biodiversity to the point where we stand to lose rare and special habitats such as temperate rainforest.</p> <p>Goats should have their own section, or be discussed as a subsection of herbivores within the park. The reason for this is because their impact is unique. There are several goat hefts within the Park and in substantial numbers in some places. There is enough data available to accurately estimate the current population as well as aim for a target population within this strategy.</p> <p>Wild deer: This document should map what the current herbivore pressure is, as all the data is available, similar to the woodland creation opportunities map. With herbivores being one of the main threats, this should be better reflected in the strategy. This document could indicate the current deer density and the long-term vision needed to allow woodland expansion across the Park without the need for fencing.</p> <p>We are aware that Sika deer have also been spotted/ culled in the middle of the Park (Achray Forest) in recent years. This incursion by Sika should be directly addressed in this document as their numbers are likely to increase if left unmanaged and this non-native species will add further to the current pressure.</p>
Do you agree with the strategy guidance on social and rural economic development?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>Firstly, this section should clearly link the provisions on ancient woodland and development management presented in the Local Development Plan. As stated above, we are aware of proposals within the Park which could result in direct and indirect impacts to ancient woodland. Therefore, in order to clarify ancient woodland protection, as advised in the Scottish Planning Policy and also in the Scottish Government's Policy on Control of Woodland Removal, where this section states 'In some cases, these may impact on trees and woodlands' it should be stated 'In some cases, with the exception of ancient woodland and trees...'. We can leave the wording up to the Park Authority but the Trust would like to see ancient woodland, and ancient and veteran tree protection, in line with the Local Development Plan and national policy provisions, listed in this section.</p> <p>We do not fully agree with the guidance given on rural development and planning section. In line with provision 4.19 from the NPF3 on rural development and the national ecological network, this section on rural development and planning should link habitat enhancement with rural development benefits through the delivery of sustainable development. For example green networks developed in rural settlements and towns can be part of the wider national ecological network which benefits both wildlife and people.</p> <p>Also provisions on stakeholder engagement and consultation opportunities need to be strengthened in the final version of the strategy. Wording such as 'consideration should be given to' should be changed to 'efforts should be made to inform and engage.'</p>

Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	<p>We generally agree with this strategy guidance.</p> <p>The section 'We would encourage the use of public access management plans to inform forest management and balance the needs of recreational visitors, timber producers, conservation, and sporting interests.' should state that public access management plans will be required, rather than encouraged.</p>
Additional Comments	<p>There are no survey questions in relation to monitoring. This strategy should have its own monitoring framework; from the current monitoring section we are unclear how monitoring of this strategy delivery will be delivered, and how we will know this guidance has been successful in delivering against the particular outcomes listed here.</p> <p>The strategy design and layout should be clear and easy to read, with a logical structure from vision to objectives to actions. The Strategy Guidance sections should clearly identify the guidance given as well as any action plan.</p>

Organisation	Individual Response 1
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	No
Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	No
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	No
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
Additional Comments	Ecological restoration should be the priority in a National Park.

Organisation	Individual Response 2
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	Yes
	I would save the trees in Drumkinnon Woods by halting the monstrous development planned by Flamingoland's owner.
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	I would save the trees in Drumkinnon Woods by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	I would save the trees in Drumkinnon Woods by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	I would save the trees in Drumkinnon Woods by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	I would save the trees in Drumkinnon Woods, which house Red Squirrels and Pine Martens, by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	I would protect the landscape at Drumkinnon Woods by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	I would save the trees in Drumkinnon Woods by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Do you agree with the strategy guidance on social and rural economic development?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Refuse permission for Flamingoland's latest application to develop the area around Drumkinnon Woods.

Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	I would save Drumkinnon Woods by refusing permission to the vandalism of the planned development by Flamingoland's owner.
Additional Comments	I would save the trees in Drumkinnon Woods which provide habitat for Red Squirrels, Pine Martens and other species by refusing permission to the vandalism of the planned development by Flamingoland's owner.

Organisation	Individual Response 3
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	yes
	I am a woodland owner. I am a strong supporter of your woodland strategy vision, though I believe that the now-urgent need to protect natural regeneration (and some planted, from local seed where possible, so my support for a local tree and vegetation seed bank too!) of native tree-species, along with domesticated species such as sycamore. But the stark point that if we do not protect natural regeneration and also supplement where necessary with also-protected sowing and planting of native species, we will lose native woodland such as the one which I now own. There is a stark lack of any viable long-term regeneration in or by my wood, because of unchecked red deer browsing. this is clear in reading your report, but it is such an unnoticed sustainability problem, that it does need to be more prominently highlighted in your Strategy, and any further implementing documents
Do you agree with the objectives and rationale?	Yes
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	These are excellent objectives consistent with the vision. However especially with the community engagement ones, there is a huge positive value to be gained by explicitly stating the educational benefits of schools initiatives to involve kids and students (i.e. secondary schools too) in woodland harvesting for example, and in good woodland management. The Montessori nursery school in Killearn does some of this, but it could be expanded right across the NP territory, and in neighbouring schools such as Balfron High, which is getting involved in our G63 sustainability Hub centred in Drymen, but the whole post-code area and more. This is one area where woodland and connected sustainability practices, skills, and awareness can be brought together in a synergistic way., consistent with your holistic vision which I strongly share.

Do you agree with the management of existing woodland sections?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	I would suggest that you identify more sharply here the value of good professional surveys of existing woodlands, to identify for each specific woodland, its needs in terms of converting it into a sustainable living and self-regenerating woodland, including the possibilities for reconnecting fragmented 'patches', into larger habitats, ,and what is needed for enhancing or protecting its all-round biodiversity. Of course the issue of payments for such surveys would need to be addressed. In my experience there is also a need to be alive to collective initiatives amongst a number of neighbouring woodland owners or managers, since the biological and related factors which need responses or provide positive opportunities do not fall within existing ownership boundaries
Do you agree with the targeting woodland creation section?	Yes
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	Only to give more emphasis to the need - which you have expressed quite clearly - to manage wild deer populations more systematically, and strictly - both for new and existing woodland sustainability. Again the latter needs landscape or water catchment scale organisation - individual separate management does not work effectively, as I have seen for myself!
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
	Habitat-destruction pressures from intensive farming, (including overstocking on open fell-pasture) and other developments, is something which has been vastly under-recognised by most policy agencies, but was emphasised by the May 2019 IPBES report (Intergovernmental Platform for Biodiversity and Ecosystems Services) as the key factor in driving what is a dramatic scale and speed of global biodiversity extinction. It absolutely does deserve priority status in considering the strategy
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	I wonder inter alia whether coppicing, which with oak and birch, often for charcoal, used to be a big economic value-generator in Scotland, might if on an appropriately diversely distributed and relatively small unit-scale, be a renewed economic benefit in our region? also, natural fungal products?

Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	I think I have already suggested some thoughts on this in the previous question's response...In addition, I would also suggest that the NP will need to find ways of mitigating the impacts of the main forms of tourism which our area 'enjoys'. The Strategy doesn't seem to find any contradiction in giving tourism prime place in terms of the Park's economic benefits, yet the trends on this aspect are also encouraging developments which generate pressures which go counter to the woodland and biodiversity strategy. This will only become more acute as time goes on, so I am hoping that collective forethought will be mobilised to address this
Do you agree with the strategy guidance on woodlands and people?	Yes
Is there anything you would change about this guidance?	No
<i>Additional Comments</i>	As with the Scottish government forestry strategy, and the Good Food Nation draft Holyrood Bill, agriculture is a crucial part of good food, as in the urgent need for improving biodiversity, carbon sequestration and soil-quality, for example. If we are to make agriculture less disastrously environmentally destructive and more sustainable, for example, then agroforestry - which is almost unheard of amongst farmers, who by and large don't think about woodland on their farm - has to become more positively supported. This will need not only incentives, but also training initiatives, with a long-term perspective. clearly this should be a government responsibility ultimately, but anything which the Park can do on its own initiative, with farmers who are committed to try it out, learn from experience and accumulate useful public knowledge, would I believe be a contribution of immeasurable wider public value

Organisation	Individual Response 4
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
Do you agree with the objectives and rationale?	No
Is there anything you would change about the objectives and rationale?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy.
Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy
Do you agree with the targeting woodland creation section?	No
Is there anything you would change about this section?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy.
Do you agree with the strategy guidance on habitat enhancement?	No
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	No
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy
Do you agree with the strategy guidance on social and rural economic development?	No
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy.
Do you agree with the strategy guidance on woodlands and people?	No
Is there anything you would change about this guidance?	No
<i>Additional Text</i>	I've marked this as "no", just to draw attention to my view that what has been published for consultation is a vision, not a strategy
Additional Comments	I worry that the document as presented is a vision, not a strategy. The vision presented is all good, and few would disagree with it as a vision. But it's a mixture of "wouldn't it be nice if", and "there are opportunities", and the like. These no strategy that I can see. An example of a strategy relating to deer would be: "We will reduce the number of deer in the Park from X thousand to Y thousand by 2022". I marked my responses as "no" because I was worried that my input might otherwise be taken as an endorsement of what I fear may happen in the Park.

Organisation	Individual Response 5
Do you agree with the vision?	No
Is there anything you would change about the vision?	Yes
<i>Additional Text</i>	The vision is anodine and meaningless and could have been written for any area in Scotland. Flourishing woodland will mean totally different things to different people. In addition the vision will not result in anything without plans. The vision needs to be articulated with reference to the statutory aims of the National Park so it becomes worthy of a National Park
Do you agree with the objectives and rationale?	No
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	The objectives fail to include anything about how existing woodland and trees should be protected. The section on protecting the landscape is all about the impact of new woodland on the landscape, not about protecting existing woodland landscapes. The objective on diversifying woodland management is focussing on the wrong thing, diversifying management rather than diversifying woodland. Given the extent of conifer plantations in the Park and their many adverse impacts clear objectives should be set for how much conifer forest should be converted to native woodland and where. The objectives are generally also far too vague and should contain targets for success (only expansion of woodland cover does so and that is only to end of the current Partnership Plan). For example, how would the Park show there was "improved community empowerment" in relation to woodland management?
Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	The UK Forestry Standard is not fit for National Parks and is not an appropriate standard: it has had a disastrous consequences for the landscape and ecology of the National park (eg forestry roads, monolithic conifer plantations which are effectively wildlife deserts etc) and for people's enjoyment of the National Park. The section is written in two sections on management of native woodlands and management of what are called "productive conifer forests". This is wrong on two counts, native woodlands can also be productive - and indeed there is a demand for native hardwoods - but also because what is needed is a conversion of conifer forestry to native woodland. The section is structured as if the status quo will continue.
Do you agree with the targeting woodland creation section?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	The title is a misnomer, you cannot target without plans and unfortunately the content of the section, like other sections, is written in the form of guidance not plans. The Strategy should setting out a framework for specific plans to be delivered for specific areas such as native pinewoods. The maps that have been provided showing preferred areas are a missed opportunity, as they do not show current areas of native woodland or conifer forest - had they done so they might form a basis for decisions about where to target areas of woodland creation
Do you agree with the strategy guidance on habitat enhancement?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Its guidance, not a plan. It omits key areas, for example there is no mention of hedges anywhere in the strategy and nothing about how woodland around settlements will be enhanced. There are, however, lots of good aspirations in this section - natural regeneration, beavers mentioned for first time in Park Plans - but this needs to be developed. For example, what should the role of beavers be in woodland enhancement?

Do you agree with the strategy guidance on landscape integration and special landscape qualities?	No
Is there anything you would change about this guidance?	Yes
	The Landscape impact assessment provided for the strategy is totally flawed because it only looks at impact of woodland creation on the landscape, not the impact of existing woodland on the landscape. The Strategy needs to contain clear plans for reversing the damage that has been done to the National Park's landscape by conifer plantations and the associated industrial forest practices.
Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The Strategy fails to consider the impact development has on woodland let alone how it should be integrated with it
Do you agree with the strategy guidance on social and rural economic development?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	Without any plans, this is unlikely to change anything. It is very disappointing that the strategy gives no serious consideration to the type of alternative approaches to forestry that have been developed and promoted by Reforesting Scotland for over 20 years or what needs to change about forest practices to create locally based jobs which benefit local communities
Do you agree with the strategy guidance on woodlands and people?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The section focusses on outdoor recreation and health but says nothing about wider importance of trees and woodland to people's lives - in the creation of places people value. The section on "responsible access" is wrong. The law provides for a right of access for everyone, not a right of "responsible access". Access rights need to be exercised and managed responsibly whether by visitors OR by landowners. There is NO mention of the duties of landowners in this section. This is important because landowners at present are retreating from their access responsibilities, e.g recent decision of Forest and Land Scotland to cease maintaining path to Cruach Tairbeart and FLS is ceasing to invest in recreational infrastructure which enables the public to enjoy the woodland it owns.
<i>Additional Comments</i>	To reinforce what I have said before, until there are plans its not a strategy

Organisation	Individual Response 6
Do you agree with the vision?	Yes
Is there anything you would change about the vision?	No
<i>Additional Text</i>	The explanatory paragraph beneath the vision statement says this will result in “a strengthened native woodland habitat.....” and says nothing about non-native species. The emphasis on “native” woodland is wrong, even though the subsequent text in later sections refers to both native and non-native tree species, reflecting the fact that the Park contains habitats which contain both native and non-native species. The vision statement and its explanatory text needs to encompass both, perhaps also indicating that the strategy will consider the relative merits of both and the balance between natives and non-natives in the landscapes of the Park in future.
Do you agree with the objectives and rationale?	No
Is there anything you would change about the objectives and rationale?	Yes
<i>Additional Text</i>	The word “responsible” should be removed from the phrase “responsible access” wherever it is used. The Land Reform (Scotland) Act 2003 defines “access rights” in Scotland (section 1 (2)). The Act does not qualify these rights with the term “responsible”. It explains that these rights are to be exercised “responsibly” (section 2 (1)) and are to be managed in ways which are “responsible” (section 3 (1)). Throughout the rest of the Act the term “access rights” is used, not “responsible access”. The appropriate term, to cover all forms of public access, whether taken under the basis of statute or tradition, is “public access”. I agree with the aspirations contained within these seven objectives but the rationale needs to be altered to explain that they are not achievable under the current regulatory and grant aid regime administered by Scottish Forestry. This is because the regulatory regime is strongly biased in favour of planting instead of natural regeneration, reinforced by ineffective deer control arrangements which lead to the excessive use of deer fencing and inadequate natural regeneration in areas outwith the fences. Scottish Forestry appear to accept this is a serious problem but place the responsibility on the European Commission and the grant aid requirements laid down in the Common Agricultural Policy. This situation will obviously change as a result of the UK leaving the European Union. The LLTNP Trees and Woodland Strategy will need to be re-written to take account of these changes.
Do you agree with the management of existing woodland sections?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	See my answer to Q2.
Do you agree with the targeting woodland creation section?	No
Is there anything you would change about this section?	Yes
<i>Additional Text</i>	Climate change, biodiversity, flood prevention, timber and public enjoyment aspirations will in future be far better met if tree planting is carried out on land which is already in regular cultivation, in lowland areas, while woodland restoration and expansion in upland areas is achieved through natural regeneration linked to effective control of grazing animals. This requires a modification of existing forestry regulations and grant aid measures, as explained in my answer to Q2. The Targeting Woodland Creation section needs to be modified to explain this.
Do you agree with the strategy guidance on habitat enhancement?	Yes
Is there anything you would change about this guidance?	Yes
	I have answered “yes” above with the proviso that account is taken of the changes that I have recommended in my answers to Q2 and Q4. Some adjustment needs to be made to the section on Caledonian pinewood to emphasise that the unique characteristic of these woodlands is that they have been maintained, since the last Ice Age, by natural regeneration, not planting. Also, in relation to their expansion, this should be by natural regeneration on a watershed basis, across the full altitudinal habitat range. Existing Scottish Forestry grants are not suitable for achieving this objective.
Do you agree with the strategy guidance on landscape integration and special landscape qualities?	Yes
Is there anything you would change about this guidance?	No

Do you agree with the strategy guidance on landscape integrating woodland and other land use?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The sections on deer management are based on a traditional approach to the control of population size. This is no longer a viable option, especially in the context of a climate emergency. We need to secure widespread regeneration of upland vegetation, including the natural regeneration of trees and shrubs. The primary requirement for achieving this is the control of red deer herds, but this will not happen using traditional methods. Population size in Scotland is usually regulated through starvation, not culling. A fundamentally new approach is needed and this should be pioneered in the national parks. During the winter period (Nov – March) the uphill gates on all deer fences should be opened to allow red deer into the forests for shelter and food. During this time their accessibility will allow for heavy culling, down to levels which permit the natural regeneration of the open hill vegetation during the summer period. This section needs to be re-written to explain that the Park recommends that this approach should be adopted herewith, starting with state owned land in the ownership of Forest and Land Scotland.
Do you agree with the strategy guidance on social and rural economic development?	Yes
Is there anything you would change about this guidance?	No
Do you agree with the strategy guidance on woodlands and people?	No
Is there anything you would change about this guidance?	Yes
<i>Additional Text</i>	The term “responsible access” needs to be replaced with “public access” throughout this section and elsewhere in the document, as explained in my answer to Q2.
Additional Comments	My additional comments will follow in a separate email.