

Scottish Forestry Grants Scheme review: Consultation questions.

Use this document to provide your answers to the questions contained in the consultation document. Please use as much space as you require for your answer.

Once you have completed your response, send or email it to:

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Responses are invited by **27 June 2006** but you are encouraged to respond earlier if possible.

The Community Woodlands Association welcomes the opportunity to contribute to this consultation.

We appreciate the recognition that the Deputy Minister gives to the increased range of applicants for SFGS, of which community groups represent a major constituent. We trust that the new SFGS will continue to draw applications from community groups by providing them with the incentives that they need to deliver the greater public benefits that community control creates.

Q1. Do you agree with the principle that the creation of small woodlands should be supported in this way?

We agree in principle with the proposed measures to support the creation of small woodlands, but subject to the following caveats:

- It should be made explicit that all new planting must meet the UK Forest Standard, and all potential applicants provided with clear, easy to understand guidance.
- Minimum stocking density of at least 1600 and preferably 2000 stems ha
- Para 23 states that any such woodlands must be composed of native species only – we would note however, that this is not the same as creating native woodland (i.e. appropriate NVC types as per Bulletin 112). We would suggest that on unimproved land, native woodland is required, however, that on improved / arable land site suitable native and non – native (e.g. beech, swedish whitebeam, plus oak & ash outside “natural” range) broadleaves be acceptable.
- Para 25 “Within, or adjacent to” should be clarified – if designated sites are to have a buffer zone it should be defined upfront, not argued about afterwards.

Q2. Is the system of support for these woodlands a good compromise between simplicity and the need to adjust rates to reflect different circumstances?

Q3. Do these models and rates adequately reflect the range of situations likely to be encountered?

We feel that they are generally appropriate, although it would be helpful to have more detail on e.g. stocking densities required, and greater clarity as to what “mixed woodland” entails.

These models should not lead to the imposition of a “one-size-fits-all” standard woodland across Scotland. It is important, particularly with regard to native woodland creation, that there is sufficient flexibility in the models to allow appropriate woodland types to be established – montane scrub and lowland mixed broadleaved woodland have very different requirements.

Farmland Premium

The eligibility criteria for Farmland Premium should be possession of a valid IACS number. The stated justification for Farmland Premium is income foregone. Any land owner/manager who establishes woodland on agricultural land is foregoing the opportunity to earn an agricultural income in the future, regardless of whether or not they have been earning an agricultural income (or drawing agricultural subsidies) in the past.

The current arrangement provides a significant disincentive to forest establishment contributing to the range of public benefits from community land purchase. At present, Farmland Premium supports absentee land-owners, but is not available to community land initiatives, a situation which appears to run counter to other Executive policy.

Q4. Do you agree that Forest Plans are an important way of delivering sustainable forest management and that we should be encouraging owners to enter the scheme?

Q5. Do you have any views on the appropriate level of detail that should be included in a Forest Plan?

We would agree that Forest Plans can be a useful tool in assisting the delivery of sustainable forest management – however they do not in themselves deliver SFM. Forest Plans should, where appropriate, be integrated with other land-uses on the holding – Whole Farm Plans.

The level of detail required should be appropriate for both size and type of woodland – should be a range of templates. It is particularly important that the requirements for plans for small woodlands are not overcomplicated

Q6. Do these rates adequately reflect the costs of preparing a strategic Forest Plan?

It is difficult to give a reasoned answer here without knowing the precise level of detail required in the strategic forest plans. There is also a balance to be struck between providing adequate support for planning, and ensuring that the bulk of SFGS funding goes to support forest operations and delivery of public benefits. It seems unlikely that any meaningful consultation with local communities will be undertaken at these rates.

Q7. Do you agree with the introduction of Forest Environment Payments (FEP) and do you have any comments on the activities to be supported by the proposed FEP?

We agree with the introduction of Forest Environment Payments and the 3 basic output areas: LISS, HAPs & public access.

Our understanding is that FEPs are to maintain the delivery of specific public benefits from a woodland, perhaps at levels beyond the UK Forest Standard, whereas WIGs will support capital works to improve the woodland.

Q8. Do you support the principle of restructuring WIG and do you have any comments on the proposed rates?

We support the principle of the restructuring WIG, however, would argue for greater differentials in the level of support. Broadleaved plantation should have highest rates (reflecting stocking density). "Other conifers" should explicitly exclude LP, which should be grant-aided at the same or lower rate than SS.

Q9. Do you have any comments on the list of proposed WIGs?

We would note that some operations fit within more than activity – e.g. small scale felling and thinning" could equally be listed under "improving biodiversity"

We would also note that standard costs systems are of limited utility in access and recreation operations, where doing something "non-standard" is often desirable. We would like to see the retention of the "forest craftsman" / "forest craftsman w. chainsaw" from the current SFGS

"Improving recreation and access and Community relations" does not appear to have any operations relating to community participation. We recommend a discretionary payment (perhaps capped and based on a percentage of costs) for education, participation and interpretation costs. It is essential that there are incentives for landowners to talk with and negotiate with local communities, to involve them in planning and implementation if appropriate.

Recreation and access facilities should be promoted at a local level and information on where funds have been allocated should be made readily available to the public.

Drainage for paths should be included as an operation.

The development of Non Timber Forest Products should be seen as contributing to the range of public benefits from woodland and support for their sustainable use should be encouraged through tier 2 payments for training and tier 3 payments for diversification, skills development and organic forestry.

Q10. Do you agree with the principle that Forest Plans should become a prerequisite for access to WIGs in the future?

No. It would be inappropriate to insist on a long term forest Plan before funding a picnic bench in a 0.5ha wood. There should be a size threshold (5ha? 10ha?), below which Forest Plans are not mandatory. However, the simpler the requirements of plans for small woods, the more likely they are to be taken up.

Q11. Do you have any views on the general principle of integrating the forestry support measures into an umbrella support scheme delivered through the LMC system?

We agree with the principle, but have some concerns that integration may dilute quality – of UK Forest Standard, and of technical issues, e.g. mapping.

The full list of Tier 2 and Tier 3 measures appears to contain a number of operations which may be of interest to woodland owners – we trust that this potential demand will be adequately supported financially.

Additional, it appears that FCS is considerably ahead of the game vis-à-vis other members of the SEERAD “family” with regard to both targeting public money at public benefits, and at understanding and promoting the benefits arising from community engagement with forestry – and we would be concerned at any dilution of these.

Q12. Do you agree that top up mechanisms should be used to deliver extra support for particular activities?

Yes. We would suggest that Regional Forestry Fora have a key role to play in setting regional and local priorities.

Q13. Do you have views on which woodland types and/or geographic locations should be highest priorities for extra support through the top up mechanism?

See answer to Q12 above.

We agree with “additional support for woodland creation and management in areas adjacent to communities”, but this should include support for specific extra technical and community support as well as enhance hectare rates.

Q14. Do you have views on this, or other, mechanism for supporting community groups?

The brief details in the consultation paper sound promising. It is unfortunate that more details are not available at this time. We would support the proposal for a fund for this purpose although question the need for it to be a challenge fund. CWA would welcome the opportunity to provide feedback as these proposals are fleshed out.

CWA believes that communities considering NFLS should be eligible, and that any scheme is designed to complement the Big Lottery Fund’s “Growing Community Assets”. Activities currently supported through SFGS S8 training should be included either here or as a WIG.