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Dear Sir or Madam

Response to Scotland's Forestry Strategy 2019-2029

Ramblers Scotland helps everyone, across Scotland, enjoy walking and protects the places we love to walk. We are the representative body for walkers in Scotland and are recognised by **sportscotland** as a governing body of sport. We are a membership organisation with 54 local walking groups in Scotland, running 3,500 group walks a year which are led and organised by 1,200 volunteers.

As members of Scottish Environment LINK we are signatories to the LINK consultation response. Therefore this response below focuses on additional issues which are of particular relevance to our own organisation's interests.

Q1. Do you agree with our long-term vision for forestry in Scotland? Please explain your answer.

Generally, yes. We welcome the recognition that forestry can and should support healthy and empowered communities.

Q2. Does the strategy identify the right objectives for forestry in Scotland over the next 10 years? Please explain your answer.

Yes, although we strongly suggest that the objectives are not numbered given that this tends to lead to a perception of their order of importance. We would also recommend that the order is changed to place the environmental objective first given that the other objectives cannot be achieved without achieving a high quality environment. We welcome the link to the Sustainable Development Goals through the national performance framework, but feel there should be stronger links within the strategy to the approach to land use policy within the Land Use Strategy.

With regard to the objective relating to health and wellbeing, the contribution to Scotland's economy from the forestry sector has been quantified at £183m per year. Given that the benefits arise to the majority of Scotland's population at no direct cost to them (exceptions of course being car parking charges, mountain biking uplift, etc), this demonstrates the important role of Scotland's forests in helping to address health inequalities in Scotland, whether through woodlands in urban areas, forest schools or in links to green prescribing. This suggests that this aspect of forestry should be given greater prominence within the strategy and link more closely in approach to delivery of the government's [Public Health Priorities](#).

Q3. Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives? Please explain your answer.

Economic development – there is an assumption within the strategy that “highly productive” forestry is only that which is related to the value of planting and harvesting timber. However, the economic value of forestry also encompasses other uses of forests for public access, recreation and tourism, especially in terms of the proportion of related forestry-related employment, at around 25% of the sector’s jobs (6,312 FTEs out of 25,000 employed overall). This aspect needs greater recognition throughout the strategy, as, for example, it reflects the need for an approach towards enhancing existing woodland and ensuring new woodlands are more attractive and richer in wildlife to increase the amenity value and therefore enjoyment and health benefits for those using the woodlands for recreation.

Developing future foresters – we strongly support the greater provision of outdoor learning and play opportunities. This supports the UNHCR right to play, which the Scottish government has committed to upholding.

Wild deer – the impact of wild deer on forestry is substantial and we believe it deserves greater focus in this part of the strategy. Controlling deer more effectively through culling would be a cost-effective way of allowing natural regeneration of woodlands without the need for fencing, and a reduction in fencing would also improve the welfare of deer. Fencing is not only expensive but it also can act as a barrier to access and can lead to an artificial line in the landscape between forestry and other land uses. Fencing is also often not removed after the end of its useful life which can lead to trip hazards and unsafe crossing points. Currently natural regeneration is not adequately supported through the forestry grant process but we would like to see this change to enable a more balanced approach to woodland creation to arise. Similarly, reducing wild deer impacts would enable more montane areas to be established along with the emergence over time of a natural tree line. Supporting these natural processes would lead to more ecological resilience in the face of climate change.

Environmental and landscape quality – Scotland’s landscapes are dominated in many areas by historic forestry plantations with hard edges which have resulted in a significant negative impact on the landscape. Plantation forestry also has a tendency to cause a block on public access for long stretches, as it is often difficult or impossible to pass through these forests to reach upland areas, or conversely to get off the hill, without a long detour. We recognise that nowadays new forestry planting is more carefully designed with broadleaves surrounding plantations to soften the edges, but given the extensive sitka plantations throughout much of rural Scotland we believe there is a strong case for considering how to revisit existing plantations and retrofit these forests with new planting to improve the landscape impact.

In addition, stronger deer controls would reduce the need for fencing and enable the establishment of more montane shrub and natural regeneration of woodland. In time this would enable a natural treeline and more ecologically resilient woodland to emerge with overall benefits to Scotland’s landscapes.

Forest design does not always sufficiently take account of public access, which includes the use of fencing as well as protecting routes and creating paths through the forestry. We have been involved in cases where existing routes have not been recognized and therefore protected, especially if they are not rights of way or core paths. Well used paths may be

ploughed up during the planting of new forestry but not reinstated. When we have taken this up with forestry managers, we have been told that these paths were only “desire lines” and therefore not given any priority. However, as mentioned above, forestry has the potential to seriously affect public access in a negative way over vast areas of land, and we would like to see greater care taken during the design stage to consider public access needs as a higher priority. This could include taking the opportunity during re-planting to include the planting of native broadleaves along the sides of paths running through forest rides to soften the edges and improve the enjoyment for those using routes through forestry, and the timely removal of windblown timber which often blocks routes.

We should also say that some forest managers have been very helpful in getting paths reinstated after harvesting/replanting, and in replacing ladder stiles with more easily accessible stiles or gates after this has been raised with them, but it was disappointing that this had to be pursued and didn't happen as a matter of course. In addition, we welcome the excellent leadership shown by Forestry Commission Scotland in developing signage and guidance on managing public access during harvesting operations. However, implementation continues to be patchy which has the potential to undermine this good work due to reducing confidence in the signage on the part of those enjoying outdoor recreation.

Finally, we have concerns over the construction and maintenance standards of some forestry tracks. While their need is not questioned, poor construction methods can lead to significant impacts on the environment and landscape. We are members of the Scottish Environment LINK Hilltracks group which published the [Changing Tracks](#) report in September 2018. This report highlighted that while permitted development rights apply to track:

“the potential for major landscape and other impacts from forestry tracks shows that some forestry track proposals would benefit from much closer scrutiny at the planning stage and from the perspective of the lack of opportunity for public comment.”

During the production of this report, we received information from various members of the public with regard to forestry tracks which had not been carefully constructed or maintained and had led to undue damage. We would therefore call for a reassessment of the forest plan process with regard to tracks construction to ensure that any new tracks within new or existing forestry are subject to careful consideration.

Well-being – we are pleased to see the inclusion of this section, given the significance of woodlands and forests as places to enjoy outdoor recreation which lead to benefits for health and well-being, and the contribution to Scotland's economy, especially through tourism and mountain biking. Forest managers have an important role in creating, improving and maintaining path networks and promoting the use of these route to the public. However, we would also like to see the forestry sector recognising the stronger role that they could play in being more proactive in enabling and supporting outdoor recreation activities. Our own [research](#) has demonstrated that there is a strong public appetite for more paths on the ground and on maps with 75% of respondents to a national survey stating this would help them to be more active. As a large public landowner, the forest estate could play a greater role in taking a lead and demonstrating best practice in terms of, for example, establishing low-cost campsites within woodlands, providing specific facilities for horse-riding, or supporting the development of low impact huts as is happening at Carnock in Fife but could be introduced in many other areas. It is to be hoped that private forestry owners could learn from this expertise and experience to also create and support outdoor recreation facilities

where appropriate. The forest estate also has an important leadership role in promoting responsible access.

Urban forestry – the successful Woodlands In and Around Towns initiative and other similar projects have demonstrated the role of woodlands in providing benefits for the urban population. As noted in the consultation document, one particular study shows £14m health benefits arising from £2.5m investment, and this demonstrates the need to continue to provide funding for such projects which have such wide-ranging social benefits, including employment and training. This fits well with the increasingly-prevalent ‘preventative spend’ approach, as favoured by Scottish Natural Heritage. Urban forestry also plays a role in improving air quality in urban areas through expanding woodlands, with further benefits to health as a result.

Q4. Do the ten priorities identified in table 2 capture the areas where action is most needed to deliver our objectives and vision? Please explain your answer.

It would be useful to see what actions will flow from these priorities. However, overall we welcome the priorities as they have been set out, particularly 8, 9 and 10. We suggest there is a reference to the Scottish government’s [Public Health Priorities](#) document which includes certain priorities that this strategy could help deliver, relating to designing the physical environment of our communities, reducing health inequalities and promoting mental well-being.

Q5. Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

Regulation clearly plays a crucial role in delivering multi-functional forestry.

As mentioned earlier, given the important economic contribution of forests to tourism, public access and recreation (18% of the economic value of forestry in Scotland), it is important that funding continues to be available to support these activities, for example by creating and maintaining path networks, providing toilets and car parks and promoting these facilities. Nevertheless, the need for such provision varies according to the local area with tourism clearly more important in some areas than others, and the role of urban forestry varying accordingly. Therefore we suggest that Regional Land Use Frameworks, as proposed in the Land Use Strategy, could be a useful mechanism for identifying and delivering regional priorities. Previously Regional Forestry Forums were useful mechanisms for involving local representatives in decisions relating to forestry management and WIAT schemes have been a successful delivery model.

Q6. For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

As mentioned in our response to Q3 above relating to wild deer, we would like to see more incentives to deliver naturally regenerating woodland without the need for deer fencing.

It is important that forestry expansion does not lead to any restrictions on public access due to the loss of established routes or inaccessible fencing. Likewise, harvesting operations need to take full account of the need to facilitate public access through the period of these operations and clear guidance regarding the need to fully abide by all public duties relating to access during the forestry grants process would be helpful. This could include the reinstatement of paths after forestry operations (not just core paths) and the use of gates which enable all users to access the forests, rather than stiles which restrict cyclists, horse riders and less able walkers.

Financial support to landowners to provide a wider range of public benefits through forestry is essential.

Q7. Do you think the proposed progress indicators are the right ones? Please explain your answer.

In terms of the proposed indicators, it depends what data is already being collected and where there are gaps. Data needs to be collected in a consistent way.

Q8. Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

In relation to indicators to measure use of Scotland's forests for health and wellbeing, we suggest a measure of the length of paths in woodlands might be useful.

The current Scottish Forestry Strategy indicator relating to the proportion of the population with accessible woodland greater than 2ha within 500m of their home should be continued.

There may be greater potential for the Forestry Strategy to support the Scottish government's [Play Strategy](#) which discusses how frequent forest visits should be integrated into curriculums throughout the year .

Q9. For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

The indicator relating to path length would help to gauge the extent to which, over time, public access is being reduced or expanded within the forest estate and areas of private forestry.

The indicator relating to distance of woodlands from home would help to demonstrate how easy it is for people to access woodlands, and therefore to potentially bring benefits for health and well-being to a larger proportion of people.

Q10. Would you add or change anything in the Equality Impact Assessment (which includes our assessment of the potential impact of the strategy on inequalities caused by socioeconomic disadvantage – Fairer Scotland Duty)?

As noted in the LINK report, this assessment only relates to workforce diversity and misses the opportunity to consider issues relating to access to nature, greenspace and recreation and how these relate to social inclusion.

Q11. Would you add or change anything in the Business and Regulatory Impact Assessment

No comment.

Q12. What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?

The Environmental Report is comprehensive and we welcome the emphasis on the positive effects on health and wellbeing as set out on p37.

Q13. Should any additional evidence sources be used in the Environmental Report? Please provide details.

No comment.

Q14. What are your views on the predicted environmental effects as set out in the Environmental Report?

It would be useful in Priority 2 on p47 to refer to the Land Reform (Scotland) Act 2003 and the Scottish Outdoor Access Code.

Q15. Do you agree with the conclusions and recommendations set out in the Environmental Report?

We would like to see more recognition of the potential impacts of forestry on public access/recreation. We are aware of many places currently where access is hindered through locked gates or stiles, or by well-used paths not being re-established after operations such as planting. More work to raise awareness of good practice is needed.

Q16. Please provide any other further comments you have on the Environmental Report.

Q17. Do you have any other comments you would like to make about the draft strategy for forestry in Scotland?

No comment.

We would be happy to discuss these issues further.

Yours faithfully

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