The Southern Uplands Partnership

Our vision for trees, forests and woodlands in Southern Scotland.

The distribution of trees, forests and woodland across the South of Scotland make it amongst the most wooded parts of the UK while retaining a diversity of land use, a range of economic activity, a variety of high-quality landscapes and a full range of natural habitats.

This includes native woodland, mixed woodland, resilient softwood forests as well as trees in our urban areas and farmland and is well connected forming extensive habitat linkages. It ensures we continue to have a resilient timber industry, creates opportunities for tourism and recreation, supports thriving wildlife and helps adaptation to climate change including removing greenhouse gas from the atmosphere. They are also designed to maximise education and health benefits. Communities are involved in decision making concerning planting and increasingly have a stake in ownership. Overall local people are active in ensuring that we maintain, enhance and create new high quality, ecologically resilient and diverse forest and woodland environments as well as open habitats. This will be delivered through partnerships and community engagement.

Our concern

There is currently a major and rapid shift in landuse taking place across Southern Scotland. This is being driven by a combination of public grant, economics and assumed environmental benefits. We believe this change is not being as carefully considered as it should be. We risk losing a range of habitats, species and opportunities for a more diverse pattern of landuse that might improve community and environmental resilience. We hope that this paper may stimulate debate and help the forthcoming review of the UK Forestry Standard.

Our definitions

The UK Forestry Standard sets out guidance relating to all forestry activity in the UK. It is the essential reference point for those involved in managing forests in the UK. It uses the definition of forest to encompass all land with tree cover noting that larger areas are generally referred to as forests and smaller areas as woods or shelter belts. They regard woodland as synonymous with forest.

In the South of Scotland, we are concerned that the mixing of the terms **forest** and **woodland** is misleading because of the huge extent of planation forest and the

much more limited extent of more diverse woodland. So in this document we use the term woodland (which may include non-native conifer as well as broadleaved tree species) to mean ”mixed species tree-cover in long-term retention or continuous cover (or natural regeneration) with enough spacing to function as an ecosystem ie have a ground layer and or shrub layer of plants ”. Forest is used to refer to commercial, plantation tree cover that lacks these features.

The SUP supports the views expressed by Scottish Environment LINK as set out in their statement “*Achieving net-zero emissions and nature’s recovery: the role of trees and woods*” from which the following ten statements are taken. In the section below, each of the ten points is considered in the context of South Scotland.

1. We need a significant expansion in trees, forest and woodland cover to respond to the climate and biodiversity crises.

2. Funding and other support, including advice, must be made available by the Scottish Government to deliver on the level of forest and woodland expansion needed.

3. Woodland expansion and restoration should favour native species and natural regeneration.

4. Forest and woodland expansion should be guided by Scotland’s Land Use Strategy and Land Use Frameworks.

5. New forests, woodlands and tree-rich landscapes should deliver multiple benefits for climate, nature, and people.

6. A more ecological approach to commercial forestry is needed which delivers biodiversity enhancement alongside other benefits, with the nation’s forests managed as an exemplar.

7. High standards for delivery of new trees, forests and woodland should be backed up by transparent monitoring and reporting.

8. Expansion of our trees, forests and woodlands must be accompanied by better protection of existing species and habitats.

9. Expansion of our trees and woodlands must be accompanied by appropriate protection of the historic environment.

10. Woodland expansion must be pursued alongside emissions cuts across every sector.

Position Statement on Forestry in South Scotland from the Southern Uplands Partnership.

1. We need a significant expansion in trees forest and woodland cover to respond to the climate and biodiversity crises.

Forest and woodland expansion is in general a good thing because it will help us address the climate and biodiversity crises and the Government should be supporting forest and woodland expansion (and restoration) through support, advice and funding. However, care must be taken to ensure that other valuable habitats (and cultural sites) are not lost as a result of poorly planned tree planting. To this end, it is important that forest and woodland expansion are well planned and based on the best available data.

Of course, in South Scotland we already have a lot of tree cover. In 2014 Dumfries & Galloway already had 31% tree cover and the Scottish Borders had 18.5%. The average for South Scotland is now reckoned to be 25% (2019 figure) compared to the average across Scotland of approximately 18% of the land is classed as forest and woodland".

South Scotland is attractive for forestry investment because of the good transport links and proximity of processing plants (especially in D&G and Ayrshire). In 2019, coniferous forest made up approximately 75% of all woodland in South Scotland (and some 60% of the stocked area was Sitka Spruce). 50% of recent planting (2020) across Scotland has been of coniferous species while in South Scotland the figure is significantly higher at 88%[1].

The Scottish Government has set ambitious targets to accelerate expansion of "forest and woodland" in Scotland (from the current planting target level of 12,000 hectares annually in 2020/21 up to 18,000 hectares in 2024/25"[2].

There is a real concern that South Scotland is taking more than its' share of new tree-cover. In addition, disproportionately more of the planting is coniferous forest and much less of the planting is woodland compared to other parts of Scotland. This is evident from the recent statistics for 2020/21 and continuing a long term trend in South Scotland.

There are also concerns that the drive to meet planting targets is pushing forestry onto sites which are not suitable eg peatlands (where the climate benefits are questionable) and species-rich habitats (where there is likely to be a net-loss of biodiversity).

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[1] https://www.forestresearch.gov.uk/documents/7806/CompleteFS2020.pdf
[2] https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/pages/2/

2. Funding and other support, including advice, must be made available by the Scottish Government to deliver on the level of forest and woodland expansion needed.

At the time of writing (April 2021) there is no clarity on future support for agri-environment grants while there are generous afforestation grants. This inevitably skews the decision-making process. Forestry supports a significant number of jobs in South of Scotland (although there is no accurate figure for this – it is thought to be between 2500 and 5000) and is currently a profitable land use. Tax benefits and the value of timber means that high rates of return (circa 10%) can be obtained by investors[3]: These benefits are bound to influence both investment and land-use decisions.

It is up to Government to regulate the market forces and to support landuses that generate other benefits that may be of equal or greater value to society. If left to the market, the current switch from farmed land to plantation forestry will continue and the opportunity to generate a more diverse and resilient pattern of land-use, including other woodland, will be missed.

In our view public funds should only be used where they help to generate public benefit such as carbon sequestration and biodiversity. They should not support activity which is not beneficial or even damaging to public benefit.

3. Woodland expansion and restoration should favour native species and natural regeneration.

The recent Dasgupta Review[4] has stressed the importance of working with nature to ensure that the ecosystems that we depend upon are maintained or allowed to recover. In South Scotland we already have a very skewed proportion of predominantly single species plantation forestry, often based on limited clonal types and this is currently exacerbating biodiversity loss from habitats that it replaces.

While new woodland and forest can add to our Natural Capital, there is a great deal of concern that it is actually degrading other elements of our Natural Capital and hence the ecosystem services that are delivered. Forests as we define them are likely to be less resilient to fire and disease and the risks of both will increase as global temperatures rise. Woodland, native trees and functioning ecosystems are likely to be more robust and greater diversity and connectivity of habitats (UKFS biodiversity recommendation 8) is key to future resilience. Decisions on restructuring, restocking taken in conjunction with the local community and local authorities will ensure woodlands that deliver a wider range of benefits than is currently the case.

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[3] https://moneyweek.com/502435/save-on-tax-and-save-the-planet-put-some-money-in-forestry

[4] (Dasgupta, P. (2021), The Economics of Biodiversity: The Dasgupta Review. Abridged Version. (London: HM Treasury)

4. Forest and woodland expansion should be guided by Scotland's Land Use Strategy and Land Use Frameworks.

The Southern Upland Partnership welcomed the strategic, integrated approach to land use and forest/woodland expansion that was set out in the previous iterations of the Land Use Strategy. The Scottish Borders Pilot Land Use Strategy[5] developed this approach further, mapping opportunities for land-use change so as to maximise benefits and minimising a range of negative impacts. Such an approach appeared to offer a really useful tool in targeting public investment in land-use to where it will generate the greatest "ecosystem service" and hence public benefit.

Many of the principles we would like to see implemented are already recommended by industry strategies and advisory reports such as the Scottish Forestry strategy (2019), Woodland Expansion Advisory Group report (2012) and the Scottish Land Use Strategy (2021) and are expressed in Local Authority Supplementary Guidance Documents. Taken together, it ought to be possible to guide tree-planting to the most appropriate locations (right tree in the right place) and to retain a range of local landuses. Without such mechanisms, there is a risk that land-use decisions will simply follow the economic signals as is currently happening in much of South Scotland.

Regional Land Use Partnerships (RLUPs) and the Land Use Frameworks may be useful, but they need to have the ability to influence decisions and work at a meaningful scale. There is a risk that by the time the RLUPs are fully functional, it will be too late to influence significant land-use change. We therefore propose given the rate of land use change that we urgently need to prepare a South of Scotland Forest and Woodland Strategy to ensure all perspectives are reflected in a statutory document.

5. New forests, woodlands and tree-rich landscapes should deliver multiple benefits for climate, nature, and people.

The idea of "the right tree in the right place" has been around for some time. Local Woodland strategies have sought to determine where there are opportunities for various types of woodland based on landscape, soil-type, natural and cultural heritage, flooding issues and access interests.

Trees and the timber they generate are a resource that should sustain a wide range of opportunities for local jobs and well-being. The development/revival of a "woodland culture" is a long-held ambition. This is made more likely when plans for forestry are shared with and influenced by local people. The SUP suggests that future expansion of tree cover should be carefully planned and managed to ensure that it delivers optimal local benefits. The areas recently chosen as pilots for a more strategic approach to new forestry allowed some of these issues to be explored and

[5] https://www.scotborders.gov.uk/info/20013/environment/723/biodiversity/4

we were pleased to be able to play a role in consulting with local stakeholders as to how to increase such benefits and reduce negative impacts[6].

At present, community engagement is often too little and too late, resulting in opportunities to improve woodland design for a range of benefits (ecological, recreational ,cultural, spiritual, artistic, etc) being missed. The additional cost of better early-stage consultation is minor compared to the cost of implementing forest schemes and the additional benefit could be significant.

Clearly large-scale forestry expansion plans are already bringing major changes to the landscapes of the South of Scotland. Many proposals do not adequately respect local landscape character, this is in spite of local landscape character guidance issued by local authorities and landscape guidance published by Forestry and Land Scotland.

Consultation procedures were updated following the Jim McKinnon report in 2016[7] and proposals are now published online and available for comment (although it is not clear how many people are aware of this). (see https://casebook.forestry.scot/w/webpage/prhome).

We have previously suggested that a quick and cost-effective win would be to require all new planting proposals to be screened by Biological Record Centres to identify possible sites of ecological value. This would allow plans to be modified at an early stage and would reduce the chances of planting on valuable sites.

In our view, further afforestation should not be considered without wider stakeholder and community consultation. This will need to be carefully planned and implemented to ensure productive dialogue is achieved and maintained. There is currently, within the region, considerable anti-forestry feeling. Consultation exercises will therefore need to seek to show how landuse change can be integrated with other landuses and demonstrate that the proposals can deliver significant local and regional benefits.

Loss of farming families, loss of open ground, loss of biodiversity, loss of archaeology and cultural heritage, more monotonous landscapes and increased timber movements along poorly maintained roads and through small towns and villages are all regularly blamed on forestry. We suggest more could be done to done to increase the benefits to local communities (as is done when wind farms are developed).

We also suggest that there is room for much more agroforestry. Public funding could be targeted/increased to promote the integration of farming with forest and woodland planting (though we favour a focus on woodland as we define it). This could encourage schemes to offset carbon emissions from farms or elsewhere. There would seem to be significant opportunities to increase woodlands through a more

[6] https://forestry.gov.scot/support-regulations/woodland-creation/regional-strategic-woodland-creation-project.

[7] https://www.gov.scot/publications/mackinnon-report/

joined up approach with farmers and this more integrated approach would deliver multiple benefits including more varied landscapes.

The current example of the South of Scotland tree planting grant supporting small scale planting is a welcome initiative. It is small scale so that it does not clash with existing national schemes, but it can have a very positive impact and we would like to see it extended. Locational premiums have been very successful in the past and we would like to see more considered for use here especially in relation to on farm schemes where the opportunity for larger schemes is limited and the costs per hectare are high.

6. A more ecological approach to commercial forestry is needed which delivers biodiversity enhancement alongside other benefits, with the nation's forests managed as an exemplar.

Better designed, more diverse commercial forests would deliver a wider range of ecosystem services and be more resilient. Innovative approaches should be encouraged to seek ways of delivering multiple benefits for the regions' environment, economy and people. The region has already benefited from developments such as the Galloway Forest Park and the Seven Stanes mountain bike centres.

It is not clear what sort of forest and woodland will thrive in South Scotland in an uncertain future, so the National forest estate should be charged with trialling and promoting new methods aimed at delivering diverse resilient systems, enhanced biodiversity and other benefits. Forest and Land Scotland should manage the national estate, working with local people and others (eg wind farm developers) to deliver biodiversity, to lock-up carbon long term and to generate useful product. They should both demonstrate best practice (including operating methods, the felling and replanting of existing plantation forest, the design of SUDS schemes, access tracks etc) and experiment with new ideas. The aim should be to learn lessons that can be shared-with and applied by the private sector.

A lot of guidance on this is set out in the UKFS. especially in section 6 on Sustainable Forestry and if followed we should see major improvements on the ground here in Southern Scotland. We have some concerns about some of the guidance in UKFS such as the climate impacts of planting on organic soils and hope that this can be reconsidered in next years' review (see 10 below).

7. High standards for delivery of new trees, forests and woodland should be backed up by transparent monitoring and reporting.

By applying the UKFS the restructuring of existing and planting of new forests and woodlands should be delivering a wider range of benefits, creating new landscapes which support not just the economy, but also local communities, climate mitigation and nature/ biodiversity. Since we are now talking about 25% of the land in Southern Scotland being under trees, monitoring should be undertaken to better quantify this

range of outcomes at the South Scotland level. It is very difficult at present to know just how much UKFS objectives are benefitting southern Scotland.

A clear strategic overview and careful planning will be needed to ensure we achieve the core principles of the Scottish Forestry Strategy. It will be important that a number of Government agencies and the Local Authorities work together to achieve this. We are concerned that the current reduction in capacity within Local Authorities (with loss of key expertise) and the pressure on NGOs is seriously hampering their ability to help shape appropriate monitoring schemes. Nevertheless, given forest and woodland expansion is ongoing this has to be tackled.

We believe that maintenance of the forest should be required, not just the crop, but also the features that deliver public benefit, ie the paths, the open habitats, the broadleaved plantings. Including them at the outset is good, but they need to be managed along with the rest of the forest if their benefits are to be lasting.

We suggest that better data on the status of forests across the region is essential. We should know how much we have of each species (conifer and broadleaved) what is felled, what is planted how much open ground broad-leaved. This data exists because it is forms part of the application process. It just needs collating and made easily accessible.

8. Expansion of our trees, forests and woodlands must be accompanied by better protection of existing species and habitats.

Native woodland, composed of native species whether it is regarded as Ancient woodland or formally an ancient woodland site that has been planted or is a riparian strip of surviving fragments elsewhere usually has high ecological value. We must ensure we not only retain such sites but expand and connect them, favouring native species and natural regeneration as these will be of maximum benefit to biodiversity in the long term

Forest and woodland expansion is in general a good thing as it can help us address the climate and biodiversity crises. However, care must be taken to ensure that other valuable habitats (and cultural sites) are not lost as a result of poorly planned tree planting. There is also valuable non wooded habitat that can be damaged or lost by the wrong kind of forest or woodland planting. This is recognised in UKFS in section 6 on Biodiversity and we commend the requirements 3 and 4 and guidelines 4, 5, 23-27 set out there.

9. Expansion of our trees and woodlands must be accompanied by appropriate protection of the historic environment.

The loss of cultural sites and archaeological landscapes has been one of the most damaging consequences of forestry in recent years. These are often unrecognised at the time and their significance unrecorded. The South of Scotland landscape is particularly rich in these. Walk-over surveys prior to planting are therefore essential if this history is not to be lost. While guidance suggests this should be done, (see

UKFS section 6.3) there are concerns that it is not always undertaken. Expansion of forest and woodlands needs to take account of and protect the historic environment and its setting which can be lost forever once an area is afforested.

10. Woodland expansion must be pursued alongside emissions cuts across every sector.

It is argued that increasing forest and woodland cover is good for carbon sequestration and therefore climate change, and this can be the case. However, the effectiveness of carbon sequestration depends on the wider context; such as the soils on which the trees are grown and on the use of the resulting timber.

Tree planting can play an important role in carbon sequestration, but it can also have a negative impact (eg in soil disturbance, timber transport and short lifecycle products) and effort is needed to minimise these. If we are to react to the climate emergency greenhouse gases in the atmosphere must be reduced permanently so it is vital that forest policy ensures permanent net carbon benefits of new planting schemes. This will require ongoing review of forest policy as carbon science and our understanding of carbon cycling evolves.

It is suggested that the current policy of allowing tree planting on peat if it is less than 50cms deep (UKFS section 6.2 Climate recommendation 5) is no longer appropriate and our understanding of carbon in soils is changing rapidly. This is one of the short-comings in the UK Forestry Standard which we suggest should be considered as part of the 2022 review. There are also significant areas of existing afforested deep peats (>50cm peat), which are increasingly understood to be significant sources of carbon emissions[8]. Forests which have the potential to have such serious negative impacts should be considered for restoration; with the advances in peatland restoration techniques this is now achievable.

There is very little debate on timber usage – and we are unaware of any significant attempt to consider reducing or managing demand for timber. In contrast, the energy market is seeking to both increase renewable energy generation and at the same time improve energy efficiency and reduction of waste. We suggest a similar approach should be taken with timber usage

Greenhouse gas emissions must be cut across every sector. Forestry and woodland expansion and management must be seen as part of the solution to the climate emergency and integrated with other steps to mitigate climate change identified in Scotland's Climate Change Plan such as peatland restoration and agriculture.

Some tree species lock-up carbon up for longer – and we should be following the science as it improves. Perhaps birch on bogs will be seen to be a good thing.

[8]Evans, C., Artz, R., Moxley, J., Smyth, M-A., Taylor, E., Archer, N., Burden, A., Williamson, J., Donnelly, D., Thomson, A., Buys, G., Malcolm, H., Wilson, D., Renou-Wilson, F., Potts J. (2017). *Implementation of an emission inventory for UK peatlands. Report to the Department for Business, Energy and Industrial Strategy*, Centre for Ecology and Hydrology, Bangor.88pp.

Suggested rewording of the LINK statement :

10. Woodland expansion, restocking and retention must not be climate negative and must be pursued alongside emissions cuts across every sector