

Scotland's Forestry Strategy 2019-2029

The Moorland Forum welcomes the opportunity to respond to this consultation on Scotland's Forestry Strategy. The Moorland Forum brings together 28 member organisations with the agreed aim of achieving a sustainable future for moorland through collaborative work. You will appreciate that the Forum represents a wide variety of interests and it is difficult to represent all of those many and varied views adequately. Many of our member organisations will provide a full response in their own right. The full list of Forum members can be found at <http://www.moorlandforum.org.uk/who-are-we>. With this in mind, the Forum limits its response to general thoughts on the development of the Strategy rather than providing answers to specific questions.

Further it should be noted that Cairngorms National Park Authority, Forestry Commission Scotland, Loch Lomond and the Trossachs National Park Authority, SEPA, Scottish Natural Heritage and Scottish Government are members of the Forum, but each has indicated that as government bodies they cannot take part in developing this response, and that they should be excluded from the list of members for this purpose.

The consultation draft was considered at the November meeting of the Moorland Forum and a number of general points came out of that discussion that may be helpful. Many of these centre on the better use and implementation of the Land Use Strategy.

As might be expected of a Forum concerned with moorlands, there were some who expressed concern about the impact forestry expansion may have on moorlands, both in terms of loss of moorland and of the impact more forestry may have on the maintenance of the moorland habitat. However, it is perhaps not helpful, or indeed fair to either forestry or moorland to paint a picture of one as good and the other as bad, and we should recognise that both have a place and a role in Scotland's rural areas.

Views were expressed that concern over the perceived threat which forestry expansion poses to moorland might be alleviated if there was a way of seeing the mix of land use and habitat types the Scottish Government would view as optimal for Scotland, particularly if this could be linked to the outcomes it wishes to see Scotland's land deliver. Scotland's Land Use Strategy and a Vision for the Uplands were discussed in this regard.

It was felt that the Forestry Strategy represents another sectoral strategy which, alongside the many single-issue action plans pertaining to rural Scotland, represent a confusing picture of multiple ambitions some of which complement each other while others compete. The use of the Land Use Strategy principles as a means of providing overarching direction and cohesion was felt to be important to making sense of this landscape. Although there were references to the Land Use Strategy in the Forestry Strategy, there was frustration that it hadn't been used in the way described above.

As things stand, it is felt that it would be possible for respondents to comment on whether the Forestry Strategy achieves the aim of expansion and to comment on both the positive and negative outcomes that expansion is likely to lead to. What is much more difficult to give is a meaningful response on whether or not the negative impacts are acceptable costs of achieving an overarching objective (such

as might be expressed through a vision), because an overarching objective is not known.

The concept of “the right tree in the right place for the right reason” was highlighted by Forum members as important and we are pleased to note the Strategy document itself picks this up as a central idea. At the moment however, forestry expansion happens on a largely opportunistic basis, albeit there are rules around avoiding some things and mitigating others. Some Forum members have highlighted that a more thorough assessment of the right tree in the right place for the right reason could be achieved by implementing more widely the opportunity mapping that the Land Use Strategy pilot projects started to develop. It would enable those managing land to compare more thoroughly forestry and woodland planting with a range of other options and possibilities and more clearly see the trade-offs.

Moorland Forum members understand that the issues we highlight above are not easily dealt with and are not just for the forestry sector to implement. We hope that as the Forestry Strategy is developed, the Forum can be called upon to help tease out some of the issues and assist with efforts to deconflict potentially competing interests, so that both moorlands and forestry & woodlands can flourish in Scotland.