

## Consultation Responses to the draft Cairngorms National Park Forest Strategy

### Summary

- a) 97 Responses received.
- b) Overall the reaction was very positive.
- c) A diverse mix of sometimes strongly opposing views.
- d) The vision section attracted a lot of comments; 57% positive.
- e) Strong support for all 10 of the Strategic objectives (each 80%+ positive).
- f) The negative reactions to strategic objectives tended to be against the inclusion of rural development objectives.
- g) Reactions to the policy guidance sections were also favourable (mostly 75%+ positive), but the one on “integrating woodland creation with other land use (only 57% positive) attracted the most comments.
- h) A significant number of comments related to opposing views on native versus non-native species.
- i) We didn’t ask a specific question about the targeting section; however this has attracted a lot of comments which indicated a lack of understanding.
- j) Adjustments to the draft will be relatively modest, aimed at improving the clarity of the text.
- k) We need to ensure that the targeting section is clarified and is tied strongly to the vision section.
- l) The following table provides an overview of the key points raised by consultees separated by each section of the Strategy.

### General Points

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Why are Caledonian Pinewoods not included in the draft with details on how they will be protected? Strategy very much biased towards productive forestry. Strategy also has to define nomenclature for these remnants eg 'as in 'managing the Pinewoods of Scotland' FCS,
Strategy needs more linkage with other key strategies in the CNP eg the LDP, Capercaillie Framework, Scottish Pollinator Strategy, SEPA regulations, land use planning.
Requires reference to improvements in water quality and protection of riverbanks from erosion - meeting targets for CMP's.
Wealth of evidence that planted trees do not replicate ecological connectiveness of regeneration, ancient woodlands are living museums which should not be joined up by landscape gardening projects. Planting is the main threat to Caledonian Pinewoods and should not be an expansion option. There is no reference to the Caledonian Pinewood Inventory. The Forestry Commission Policy and Strategy documents "Scotland's Woodlands and the Historic Environment" and "Woods for Nature", and "The Scottish Government's Rationale for Woodland Expansion" all stress the need for natural

<p>regeneration in designated areas. FCS Guidance Practice Guide No 7 Native Pinewoods. Examples of infilling Recent approvals have allowed the infill by planting of superb natural regeneration beside the B9007 North from Duthil, and the A939 near Connage.</p>
<p>It would help to identify how CNPA informs woodland management: education, responds to consultations, targeting grant funding, provision of planning guidance. Should use 'promote/support instead of 'encourage'. CNPA could develop best practice events eg agroforestry. Influence SRDP options eg shelter for cattle and deer instead of only sheep for woodland grazing, develop target areas for reduced deer numbers, work with FCS to improve FGS for natural regeneration and native woodland management of Trees for Life campaign.</p>
<p>CNPA have set bold targets for social and environmental targets but how will this be measured eg what is the value of forestry in the CNP now and what targets should be set for future years; direct employment in forestry industry; indirect employment in tourism and recreation; how does woodland value compare to agricultural or grouse moors. Clearer on demand for native wood products. Could include scenarios as examples eg impact of a large forest fire in Glenmore removing recreation, effect of high summer temps on Spey and Dee on salmon. Recognize that CNP not a closed system, supply chain for most forest activities extend well beyond the boundaries. Strategic changes EU, exchange rates, national and international trading (WTO), land value, forest assurance schemes and EU environmental designations likely to have short and long term impacts on forest management and planning in Scotland - more prominence in strategy required. CNPA set bold ambition but needs to reflect on innovation required to deliver woodland models, broadening the measurement and disclosure framework so we can build a full understanding of forest impacts on society and the environment.</p>
<p>It might be helpful to explain that the Strategy fills the gap no longer filled by the Highland Council Indicative Forest Strategy and that it replaces the Cairngorms Forest &amp; Woodland Framework.</p>
<p>Is it worth expanding on the opening statement? E.g. Most woods benefit from some form of management to meet owners' objectives and to meet expectations of other stakeholders and government; from deer control that ensures tree regeneration to tree felling and extraction that contributes to the local economy and stimulates habitat improvement for wildlife. 'Sustainable', or 'appropriate' rather than 'sensitive' forest management?</p>
<p><b>Vision</b></p>
<p>There should be bullet points for the scientific and educational benefits from natural forest evolution.</p>
<p>We suggest that the vision identifies the need for enhancing all aspects of habitat for biodiversity and not just connectivity.</p>
<p>Nice descriptive vision but needs more on the drivers and strategies that will shape decision making to realise the vision. Eg projected climate change conditions for Scotland-increase in summer mean temp, increase in agri production in lowlands meaning more demand for water. Explicit consideration of changes from Brexit, eg demise of Habitat and Water Framework Directives.</p>
<p>Need bolder more ambitious vision, suggest target 19-25% for expansion by 2038. Increasing forest cover by 5000 hectares will only increase the coverage to 18%. This is not ambitious enough.</p>
<p>Vision should include Ancient Woodland restoration.</p>

<p>First line 2038 should be "An increased appreciation of the value of <i>natural</i> native forests"..... Forest expansion can only be at loss of other habitats and ecosystems, with adverse effects on other species.</p>
<p>Appreciate the attempt at a LTP but we would like evidence that proposals are sustainable as defined by NP aims and how they will be achieved in a coordinated way - A Forest Plan is detailed and well researched and takes approximately 3 years as an eg.          Background info for the vision is light and poorly informed Section 1.3 p.8. ref to NWSS, p8 native species (not native woodland) forms the majority of woodland resource (Scots Pine plantations may not be native origin Scots Pine and they have a very different feel to native woodlands established by natural regeneration. Similarly keep "native woodlands" separate from Scots Pine Plantations".</p>
<p>p9 - no definition for Caledonian Forest - is this a misnomer as it refers to all ancient Scottish Woodland - perhaps quantify the ancient woodland resource or the area of pine forest that is contiguous.</p>
<p>p9 - reference for some of the statistics.</p>
<p>It might be useful to list what has been achieved in the past, what has worked and what are the barriers to woodland creation - what woodland creation schemes are in the pipeline for future years. It is essential that Forest Strategy addresses the key barriers to natural regeneration - deer and muirburn.</p>
<p>Text such as 'vast potential for woodland expansion' should be avoided as don't indicate careful consideration – lack of distinction between "forests", "native forests" and "productive forests".</p>
<p>Greater risk of disease from increasing use of native Scot's Pine in productive plantations eg Seafield Estate woodland 68% SP - suggest diversity of non-native conifer and BL might be suitable in right location. Cairngorms existing cover 76% two species - 60% SP and 16% birch. UK Forest standard specifies max 75% single species, at least 10% another commercial sp eg good op to use DF.</p>
<p>Risk of Climate Change altering suitability of conditions for native species.</p>
<p>Structural diversity in Strath productive woodlands suffered since WWII-limited opp for inc structural diversity before 2038 due to SP rotation period.</p>
<p>Little recognition of emerging timber technologies and potential this has to improve the uses of timber, employment and incl economic benefit eg using birch as firewood in 100yrs time is not recog timber benefits which include furniture, building, feedstock for the high - tech bio industry-solar panels. Would like to see a vision where in 20yrs time existing birch resource managed to support a new sawmill. This should include other species such as Aspen.</p>
<p>Passivhaus style homes already being built in CNP so hope that requirement for firewood goes down in 100yrs time.</p>
<p>In some places business case can only be made for non-native conifer plantations - important that a presumption for native does not stop planting of productive forests.</p>
<p>To have productive timber forests, you need access tracks to extract-impacts on landscape.</p>
<p>The profitability of forestry is far lower than well managed grouse moors so there will be jobs lost.</p>
<p>Drop the 'more high quality timber' item - National Parks are not the place for extractive timber exploitation - instead 'restore the full range of originally native wildlife'. Increase the percentage of native trees in planting schemes.</p>
<p>More focus on biodiversity. The number 1 priority ought to be biodiversity and native habitat restoration including apex predator reintroduction.</p>

Additional bullet point required to emphasise the significance of existing and expanding forests in NFM in Dee, Spey and Tay added to 20 and 100yr vision.
Wording of vision should emphasise how natural regen over large areas of watersheds would make a significant contribution to Scottish Government targets to increase woodland cover without need for planting. Natural regeneration should be promoted as the preference over planting.
Will the strategy make a difference? No mention of climate change and increased rainfall which will effect areas suitable for forestry in the future - I am stunned that muirburn is allowed given the need to reduce CO2 emissions.
Main Objective for growing trees should be for timber production. As landowners and forest managers we don't believe the vision captures the opportunities for forestry for the next 20-100yrs. UK 3rd largest importer of timber, we are vulnerable as seen this winter with wood pellet supply shortage. Threat of Brexit devaluation of UK currency making import more expensive.
Where is evidence for increased demand for commercial timber?
Forest strategy should be part of a larger Land Use Strategy for the CNP building on the work of the national LUS.
A fundamental issue with the strategy is that its approach will convert many areas that currently exhibit wild and natural characteristics into designed landscapes, instead of significantly increasing tree cover the strategy should focus on restructuring existing woods.
Statements too general and not grounded in realism. Looks at opportunities rather than addressing problems - elements of this are outwith CNPA control eg more people enjoying forests and disturbing Capercaillie. Increase in Capercaillie optimistic given forthcoming LDP and access restraints required to allow housing permissions. Over emphasis on productive forestry detrimental to Capercaillie habitat.
Concern over the 100yr vision of the central core of the CNP ringed by forests reaching their natural tree line. What about current land activities and peoples enjoyment of open moorland habitat. Heathery Hills defines as favourite Scottish landscape (Scot Gov, 2006). This vision contrary to the NPPP and the first stat aim of the park- conserve natural and cultural heritage. Conversationalists overlook the benefits of managed moorland, rewilding of iconic heather uplands should not be a strategy.
The CNPA should be leading the way in the transformation of grouse moors to realise the 2038/2118 visions or they will not be achieved. The advantage of transformation are provision of ecosystem services. "If sensitively designed and located the aspiration to expand native woodland in the NP is compatible with open managed moorland and grouse moor" is a contentious statement, muirburn should be eradicated within NP's. The impacts of driven grouse moors are ignored, given this is 40% of the NP area the efforts of the Forest Strategy are pointless.
"Co-operative deer management has enabled deer numbers etc etc - Increasing forest cover will make it harder to control deer and to have a good structure would need to control to allow saplings to take off. Deer are not mentioned in the 2038 vision so unclear how they managed in the medium-term future, why does 2118 vision talk about increased deer numbers -is aim not to get them low and keep them low in a stable population
You state "mountain hare control...on grouse moors has resulted in significant areas of natural regeneration" I know of nothing to back up this contentious statement.
Re-instatement of missing native species - beaver and lynx should be advocated now. Key-stone predators are essential. A thriving ecosystem does require predators and a 100yr

timescale allows time for constructive engagement.
Should be large core area of no planting of NNS to act as an exemplar for similar zoning across Scotland.
Need a statement about natural woodland ecosystems in the Vision-the place for re-wilding. No mention of Glen Feshie as a good example
The role of Forests in the CNP for recreation is unclear - it is not appealing to have to traverse long lines of NN Conifers.
The CNP forest vision is good but does little for the Southern Section/Angus Glens. Over 20yrs of management in Corrie Fee and Sharroch there is not a single tree or shrub over a foot high. Glen Clova, Glen Doll, the CNPA/FSC are doing nothing to restore the treeline above conifer plantations.
The FCS tree planting list is restrictive.
We need more support for community owned and managed woodland.
We need a clear strategy to manage recalcitrant private landowners who have little interest in this document other than accessing grants.
Far greater emphasis on use of forests for recreational activities, conservation and outdoor education.
The special qualities of the Park need to be explicitly recognised. For example, almost no special mention is made of the remnants of the Old Caledonian Pine Forest. The Cairngorms are particularly important as these fragments are essentially untouched by man and have regenerated naturally since the last Ice Age. They are a key feature of the many protected area designations covering the area, are of international importance, and should receive special mention.
The strategy should recognise more explicitly the Park Authority's limited powers in this area, than simply by its frequent use of "encourage" or "promote".
Suggest vision is adjusted to create a series of smaller networks which could offer bulk of connectivity benefits but reduce risk of disease, invasive species and wildfire. Eg "strengthen and further develop forest habitat networks throughout the Cairngorms to balance the risks of connectivity".
2038 does not explicitly state that grazing and muirburn have been reduced (as they would need to be) - clarity welcome.
2118 allows rise in deer numbers-native woodlands need permanent reduction in grazing with little room for return to recent or current high levels. Also applies to strategic objective 3.1b - enhance condition of existing forest.
2118 bird sentence engaging but non-aspirational -what about tree species, biodiversity in general, resilience to disease, lower deer numbers but better habitat-larger healthier deer, more diverse woodland provide more opportunities for people to connect to nature.
<b>Strategic Objectives</b>
Strategic objectives too weak! Insufficient guidance to the types of policies required. Insufficient explanation why Cairngorms Woodlands are so special and unique eg natural regeneration section does not emphasise importance of process in Cairngorms. Does not emphasise that human interference less here and natural processes dominate-central themes to designation as NP. Should emphasise age and structure of forests -historical monuments in own right.
Specific reference to protection of Priority Habitat Bog Woodland should be made.

<p>We support all of these objectives but as landowners and forest managers our primary objective is sustainable land use that provides an economically viable land holding producing goods and services that we require and desire, this is more important than the strategic objectives mentioned.</p>
<p>Only one of the objectives is dated and quantified, i.e. to increase forest cover by 1000 ha per year for five years. This seems to be arbitrarily based on a proportion (10%) of the national target of 10000 ha, when the Park occupies only 6% of the national land area. An area objective depends on its composition as between planted forests intended mainly for commercial timber, and others – whether planted or naturally regenerated – intended largely for environmental purposes, e.g. landscape, recreation, wildlife and/or carbon storage.</p>
<p>Identify true costs of forest activities eg road damage, carbon release on large scale harvest, innovate financial incentives to manage more sustainably eg continuous cover, biodiversity improvements, carbon capture.</p>
<p><b>Promote creation of new woodlands that complement other land use.</b></p>
<p>This section is restating national policy and guidance and is already considered when looking at new woodland creation schemes.</p>
<p>This guidance is too open-ended and virtually anything becomes possible in any location, there is failure to spell out the scale of issues. Eg. statements on deer control. The CNPA need to be much more explicit about the need for deer control without resorting to deer fences.</p>
<p>There should be a section on 'Development Management' which links to the LDP - 'PP should be refused for any development resulting in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland unless wholly exceptional circumstances outweigh the loss'.</p>
<p>Proportion of tenanted farms have a bearing on delivery of agro-forestry, should be support for woodland integration on farmland to help support agri business.</p>
<p>Conifers including NNS and broadleaves should be considered as a farm crop to deliver economic returns.</p>
<p>Strategy places current mismanagement of moorland as acceptable starting points for woodland strategy to expand on should address conflicts and place woodland regeneration at centre stage.</p>
<p>Could use 'demonstration estates ' as good practice examples.</p>
<p>Yes, but worry that CNPA have a view that declining farm management could impact on landscape.</p>
<p>Suggest "if sited appropriately" is added to the objective to capture negative impacts of woodland eg on waders.</p>
<p>How was target for 1000ha/yr calculated? 1. There will be some thousands of acres of 'low hanging fruit' but as these are forested then the target of 1,000ha/a of trees will eat into land used more productively.</p>
<p>recommend strong presumption in favour of native species, with zoning of areas where there are only native species promoting removal of NNS.</p>
<p>Woodland crofts integrate multiple management activities and complement other land use due to smaller scale.</p>
<p>Recommend presumption in favour of natural regen recognizing that this will lead to diverse range of species and age structure, reflecting local conditions.</p>
<p>Emphasis should be on using native seed sources and local provenance.</p>

Planting acceptable to ensure faster response which may be required in response to climate change eg for flood mitigation.
If historic native woodland is fully restored there will be dramatic scaling back of other land use, threatening its viability.
Woodland Trust Scotland would like to see support for new woodland creation rather than just encouragement-financial support would be a welcome contribution.
<b>Enhance the condition of existing forests.</b>
Recognition that for woodland to be of highest quality of wildlife, there is a requirement for zoning access to prevent disturbance eg caper.
The need to eliminate threat species such as Lodgepole pine must be seriously addressed.
Concern that implies all woodlands require management - and that without it woodland will degenerate- recommend that this is removed- would like to see promotion of natural evolution of habitats. CFS should address current grant scheme arrangements that don't deliver on environmentally sensitive forest management.
Should be targeted support to increase restructuring in priority areas.
It is incorrect to state that old native trees, particularly Scots pine, are “barely capable of producing seed”. Success of regeneration around these sites may have as much to do with grazing, browsing and vegetation competition as seed viability.
Most of the employment and economic gain from forestry is generated through the process of harvesting, transportation, processing and value adding. Too many conditions and costs placed on harvesting will severely damage the incentive to invest in forestry to produce the goods and services we require or desire.
<b>Restore lost or vulnerable forest ecosystems</b>
The action ‘dense conifer stands in close proximity to watercourses should be gradually replaced by native broadleaved species’ repeats UKFS, better action might be ‘assess the damage being caused by unmanaged conifer stands near watercourses, and target suitable assistance to landowners to bring the most problematic areas back into management.
The retrieval of native woodland heritage, by increasing understanding of its value, should first and foremost begin by recognising that habitat 19C0 is wrongly named as Caledonian forest. Caledonian forest denotes a forest that no longer exists. The use of this misnomer perpetuates a common misapprehension about their natural heritage. Their natural heritage importance was recognised by Steven & Carlisle when the mostly coniferous boreal remnants of the original Caledonian forest were authenticated as ‘descended from one generation to another by natural means’ since post - glacial establishment, should be referred to as Caledonian Pinewoods’ (1). Planting within the OCP’s will destroy the evolutionary continuum that they represent. *Guidance should recognise the authenticity of the Old Caledonian Pinewoods.
I have a dislike of the phrase "restore" especially in relation to "Caledonian Forest" - people are apt to nurture a romantic image of vast endless tracts which evidence suggests didn't exist and what did was during different climatic conditions. It is possible for forest to be lost through entirely natural actions such as climate change. Your vision suggests forest loss is not allowed under any circumstances.
Broaden scope to include: Bog woodland, Juniper scrub, aspen woodland, veteran trees, oak and hazel and riparian woodland.
All native and ancient woodland within the Park should be placed into sustainable management for resilience as a matter of course.

All native species need safeguarding and holistic approach would be advisable, rather than the focus on a few species, such as montane willow.
We would very much welcome reference to further enhancement opportunities in riparian zones in terms of possible morphological improvements (e.g. removal of fish barriers, culverts, fords and possible realignment of straightened watercourses). It could be emphasised in the CFS that these additional habitat enhancements would be looked on favourably within any forestry area/plan.
In terms of flood risk impacts, we recommend the provision of buffer strips adjacent to watercourses in flood risk areas and in general would advise against the planting of trees in these buffers in functional floodplains in order to prevent the increased potential for blockages occurring due to in-channel debris.
Need to explain in greater detail why riparian zones need to be bigger - climate change, nutrient removal, beaver adaptation.
Need reference to working with Catchment Management groups.
Expansion of riparian woodland on agricultural land should have high priority.
Mention broadleaved component of pine woodland - mainly birch dominated but enrichment planting with juniper, holly, rowan, aspen, native willows and alder beneficial for wildlife and landscape.
specific reference to neglected remnants of ancient woodland
<b>Encourage natural regeneration of native forests</b>
In parts of the park, woodland expansion is actively being prevented by muirburn management and high deer numbers.
Tension between planting and NR is the hallmark of this document - needs clarification.
This is not practical in all situations- do not want to discourage applicants or reduce quality of future timber stock by requiring natural regeneration that prolongs establishment, limits species or reduces effective stocking density. Revise to "Expand woodland through natural regeneration or planting as appropriate" with recognition that active tree planting is not second choice to natural regeneration as it can deliver many benefits eg jobs planting trees.
Requires deer management - cairngorms Connect should be highlighted, use of deer fences as last resort.
Wolves or lynx are required for deer control as in Yellowstone.
More control of muirburn and felling in CNP required.
Issue of natural regeneration of NNS should be acknowledged and addressed eg sitka spruce and western hemlock.
Where natural regen is not working eg lack of seed source, soil impoverishment - consideration of small scale planting to aid establishment.
Woodland croft - high level of management results in good condition woodland
Encouraging the natural regeneration of native forests requires collaboration from driven grouse shooting interests on grazing management and muirburn.
The statement 'promoting and supporting collaboration in habitat monitoring, grazing management and muirburn' in itself will not lead to the encouragement of natural regeneration. In addition to this, the data must be used for designing management actions plans to ensure that regeneration occurs. These naturally regenerated woods are more likely to be better at adapting to the risks of climate change and pests and diseases. We would also support a system of payments for woodland creation through natural regeneration.
Natural regen should be principle means of woodland expansion and creation and planting



only necessary where suitable seed source not available.
Patchy information on level of natural regeneration in CNP - we would support establishment of monitoring system which would demonstrate success of strategy, provide info on scale across multiple ownerships, establish contribution to climate change mitigation targets.
<b>Promote the creation and enhancement of productive forests</b>
An aim might be: to ensure applications for creation of productive forest are well thought through in terms of access for future harvesting; that new forest roads have minimal impact on other land management priorities – e.g. enhancing wild land values.
generalist comment that some productive forests are densely planted, un-thinned-no attempt to quantify or suitability for manipulation of structural diversity
unfair good v bad commercial forests with no recognition of significant management change over last century. Need to look at how much timber is supplied by which forests to ensure any changes in forest composition do not jeopardise local sawmill business. Formal consultation with sawmills and other users who source wood from the park is essential.
CNPA should be actively promoting low impact silviculture systems and discouraging large scale clearfell.
Timber production should be a by-product of a National Park not a primary management driver.
Would like to see zoning of areas where productive forestry just not appropriate for biodiversity, public amenity and infrastructure shortcomings.
Greater weight given to suitable native species not "wide range of species" which could be inappropriate to local conditions and therefore not give desired ecological or visual outcomes.
Part of the rationale might be to sustain timber inputs to sustainable forest-based industries in and around the Park.
Emphasis on quality not quantity -quality broadleaves/pine timber not sitka spruce pulp
You don't explain how this quality forest management is going to be funded. If you want caper to return you need extensive and persistent keeping to keep control of predators of ground-nesting birds for example. Of course a high density of caper will greatly inhibit the goal of productive native woodland as capers' favourite occupation is eating the leaders out of pine trees which will probably be the main 'productive' timber species.
Close grown timber produces timber of higher value for sawmills. Creating diverse woodland will lower the quality of the timber produced and make the goal of having productive forestry even harder to achieve.
This is a NP we have already seen vast plantations of non-natives by returning it to its original wild state we could increase wildlife and ecotourism, bringing back income into local communities.
There are no such things as 'native' trees, trees that add to the quality should be considered irrespective of origin.
<b>Protect forests from disease and invasive species</b>
Woodland croft model demands frequent presence and intimate knowledge of wood - easier to detect disease.
Should include <i>Rhododendrum ponticum</i> .
Natural diseases are part of ecosystem & should be allowed to progress naturally, creating important dead wood habitats.

A key element to forest resilience is genetic diversity, the CNP should aspire to better understand the existing genetic resource across its trees, especially in the remnant Caledonian pine forests. Keen to see a commitment that all new planting stock within the park adheres to the UK Sourced and Grown Assurance Scheme (UKSG) as a minimum.
<b>Increase employment in the forestry sector</b>
Increase employment opportunities for foresters and rangers to manage recreation and conservation management.
Woodland crofters will manage their own woodlands so will have transferable skills available to other employers.
A laudable aim but against the jobs created by building and maintaining forest tracks will have to be offset the jobs lost from losing productive grouse moors etc.
There is no demonstrable need to create more forestry, employment, this should be secondary to conservation/recreation objectives.
<b>Encourage innovation in the use and making of native forest products</b>
This should be revisited to "encourage innovation in the use and making of forest products" and then note using native species and local brands.
The businesses associated with growing, management and production of mainstream timber products will have a full part to play in support for development of innovation in the sector and will be well placed to invest or encourage merging timber technologies.
Yes but must address sustainability issues eg large scale harvest of Juniper berries and fungi - how would manage over-exploitation??
Rationale could reference Grown in Britain, Wood for Good and other FCS/CONFOR campaigns.
<b>Promote responsible access and active enjoyment of forests</b>
Disconnect in some cases between the wish to engage in recreation and the recognition of the forest as a workplace. Can CNPA raise awareness to recreational users about timber harvest and haulage operations
Needs to implicitly say 'Public rights of access apply to forests of Cairngorms', can we drop the 'responsible' when speaking about access rights as this is applied to no other human right eg freedom of speech.
Yes, requires zoning and more rangers on the ground to safeguard sensitive species and habitats.
For woodland crofts to be viable diversification is common with many offering tourism facilities.
Suggest independent research is undertaken to determine what visitors want to see, woodland is popular but so too is open moorland for example (source Scot Gov, 2006)
Would like CFS to refer to LA responsibility to avoid generating unsustainable pressures on natural capital.
Any reference to Forest Schools or other outdoor learning based in woodlands?
<b>Promote community involvement in forest management</b>
Refer to FCS Guidance "Woodland Creation: Application Guidance" and "EIA for Forestry Projects" both highlight early consultation to avoid and resolve conflict and opportunities for education.
Community woodland owners been at forefront of woodland croft movement eg Mull & Tighnabruaich - can we have more in CNP eg through FCS Community Asset Transfer Scheme.

Would like forest plans developed more openly with local communities and concerns addressed. Would like CFS to reference more resources available for communities to manage woodlands eg access to rangers.
Woodland only for amenity would need to have a feasible business plan not sustainable to rely on long term charitable or state funding for non-productive woodland.
Yes, but should be overseen by bodies like the Woodland Trust for advice to ensure effective management.
Reference Land Reform Act.
<b>POLICY GUIDANCE</b>
<b>Integrating Woodland creation with Other Land Use</b>
<b>Managed Moorland</b>
Grouse shooting has no place in 21st century, moorlands would have greater diversity without it, which benefits everyone.
Natural regeneration and low density broadleaved woodland only where appropriate and where won't remove valuable area for moorland grazing, grouse drives, other economic activity and waders.
Exclude bearberry heath from areas of woodland creation on moorland
40% of the park is managed for grouse moors- WTS support a stronger vision for moorland planting not limited to moorland margins eg Cairngorms Connect -young woodlands are spreading across open moorlands. WTS would support a policy that limits muirburn to within 500m of native woodlands as this is suitable area for woodland expansion and regeneration.
Targets should be set to reduce muirburn eg 5-10% in areas least suitable for grouse.
Recommend statement is expanded to avoid damage to any wetland habitats specifically GWDTE, we request that the avoidance of GWDTE is mentioned under latest best practice guidelines for peatland restoration.
Desirable to increase riparian regeneration in steep sided valleys with few trees.
<b>In-by agricultural land</b>
The National Park also has an important role in terms of promoting integrated landuse, and especially encouraging agroforestry.
Has there been an economic appraisal of value of woodland to small crofts, evidence may help uptake.
Woodland Trust Scotland do not support the suggested blanket ban on whole farm woodland planting as there are current checks and measures in place to ensure this is a viable option (FCS controlled).
Agro-forestry needs to happen now to avoid more environmental degradation - loss of topsoil, demineralisation etc.
Expanded forests would be at odds with marginal farming and grouse moors, would it involve compulsory purchase?
No mention of bracken control and its role in blocking tree growth.
Opportunity for silvopasture amongst regenerating forest.
The strategy recognizes important areas for waders but also needs to consider shadow effect of adjacent woodlands suggest new wording "new woodland creation schemes should avoid impacting on priority sites for wading birds". Clarify 'priority sites', helpful to acknowledge that some waders nest in woodland eg woodcock.
Stronger emphasis on no woodland creation on spp rich grasslands - fungi and plants

- clarification on wading bird priority sites and how land owners become aware of them - explanation in annex?
<b>Peatlands</b>
Welcome no planting on peat over 0.5m and recommend precautionary approach for peat under 0.5m.
Encourage greater collaboration on forest plans between neighbouring Estates.
Might be advisable to delete 'natural tree regeneration on near-natural peatland habitats is achievable in some circumstances' it's out of context and has complex issues. Alternatively need to explain the values and risks of woodland and carbon storage.
<b>Deer management and fencing</b>
Existing system of Deer Management Groups as failed according to recent Scot Gov, we are doubtful that "Collaboration between neighbouring deer managers..." will be sufficient as guidance and needs to include recommendations by the Deer Working Group.
Disappointed to see Mountain Hare control cited as positive in the strategy, control should be left to the abundant predators that should thrive under this plan.
Policy could be amended to 'Collaboration between deer managers to achieve deer densities compatible with good regeneration of the full range of native tree and shrub species is encouraged'. This would help to avoid the tendency for natural regeneration to only occur for the limited number of species which are more resilient to grazing and browsing (such as pine and birch).
<b>Deer Fencing</b>
Fencing is one of the most important means of expanding woodland cover from 4.5% pre 1900 to around 18% today. Once trees are above browsing height they can be used to provide livestock shelter. Deer fencing is not a short term management tool some of our fence lines have been in place since the mid-19th century. We do not agree that a fenced edge has less value for wildlife than a non-fenced edge but a hard edge can be mitigated by less dense or mixed species planting.
Would like a presumption against fencing and new marked deer fencing in core Capercaillie areas due to collisions.
Suggest change from " any fencing in or near existing woodland must conform..." is changed to 'any fencing in or near existing woodland which is a known Capercaillie or black grouse habitat must conform...' in order that policy is proportionate given higher cost of marked fencing.
No place for electrified fence in a NP - should be presumption against it.
Should be policy for removing redundant deer fence.
Define short term management tool -may have to retain for 20-30yrs in upland areas where growth slow and deer numbers high.
This guidance should include the need to retain recreational access.
For established native and conservation woodland fencing should be used in conjunction with grazing management to ensure that the required low-but-not-zero levels are maintained.
<b>Landscape &amp; Wildland</b>
CNP more intensively managed for livestock grazing in 18 <sup>th</sup> , 19 <sup>th</sup> and 20 <sup>th</sup> c than is now and much of this is now considered WildLand, we would not replace other land uses with forestry if the result is loss of goods and services that we require eg tracks which can minimise impact from recreation and land management. We desire a working productive landscape not a pretty landscape.

CFS should emphasise value of natural processes and wild qualities as assets.
Significant benefit from deer reduction and regeneration of native woodland.
There is no reference to cultural landscapes eg Scheduled Monuments and the Inventory of Historic Battlefields.
Requirement to maintain open vistas within the landscape, many have been in place since the Ice Age. The creation of woodland (a designed landscape) is in direct competition with wildland characteristics.
CFS should provide clear track creation guidance, tracks should be included within forest plans.
Well- designed woodland over the long term can enhance the landscape and increase a sense of naturalness and wildness.’ This statement is contradictory because even well designed human intervention can only result in unnaturalness.
<b>Designated Sites</b>
Include SSSI support to regain favourable condition status.
The requirement to consider SSSI and SAC is regressive given that many SSSIs essentially preserve poor ecological areas and inhibit regeneration of natural ecosystems.
Requirement to consider objectives of Designated sites and be clearer in strategy wording. Eg what type of woodland expansion on designated sites - planting or natural regeneration?
Proposed woodlands in or adjacent to SSSI would require consultation.
<b>Habitat Enhancement</b>
<b>Forest habitat networks</b>
<b>Montane Woodland</b>
Mention in policy guidance in relation to montane scub required of 2017 Climate Change Risk Assessment for Scotland 'Bioclimatic envelope modelling predicts that species associated with cold montane habitats are likely to see a contraction of their range in most northern and high-altitude locations'.
Natural regen unlikely to be sufficient which means significant amounts of cultivation required- be clear on issues and challenges.
<b>Riparian Woodland</b>
Beavers are known to flood riparian woodland and damage particularly aspen and some other broadleaved species of trees. They are also known to spread Gardia fever contaminating water supplies. Beavers block culverts and dam water courses which can damage surrounding farm and forest land. Some of the most fertile farm land in Badenoch is the haughlands adjoining water courses. This land would be particularly vulnerable to flooding by beavers blocking up culverts and ditches. Beavers have the potential to damage our local rural economy including farming and riparian woodlands.
More on temperature regulation effects and challenge of fencing long linear woodlands unless deer numbers fall.
<b>Aspen</b>
CONFOR the best way to incentivise the creation of ‘large stands of pure aspen’ would be to explore how it could be managed commercially alongside birch as a feedstock for biotech industries.
Timber from aspen currently has little commercial value beyond biomass for biomass boilers. We question the need for having large stands of pure aspen. Aspen close to watercourses would be at risk if beavers were introduced.
Need Aspen baseline data to measure success of strategy - can practical support be

provided.
Why is there not an active plan to bring beavers back and build an aspen/riparian plan around that?
<b>Woodland remnants</b>
Rather than using resources mapping woodland remnants, we suggest resources would be better used encouraging land managers to fence around mature native trees to exclude herbivores and encourage regeneration.
Support projects that identify woodland remnants not identified in NWSS and ensure covered by woodland enhancement plans
Expansion of conifer woodlands for timber production in the 19th century was often carried out on land where there were a very low density of scattered trees that had survived grazing and tree felling. It is unfortunate that a number of conifer plantations, often on their 2nd or 3rd rotation have been classified as PAWS (plantations on ancient woodland sites) because earlier maps such as the Roy maps showed these sites as woodland. We urge the CNPA to take a pragmatic view of such designations and not hold up economic or social enhancement because a woodland has been designated as PAWS.
Planting on open adjacent hill areas and between woodland remnants will interfere with the woodland systems' needs and requirements of quite large open spaces for regeneration, of time to shift areas of dense woodland and of consideration of the whole area for development and dieback.
Studies have shown even old pine produces sufficient viable seed.
<b>Ancient and semi-natural woodlands</b>
WTS would be happy to partner on any AWI updating project.
Is there a process to ensure that ancient woodland restoration is considered on PAWS instead of continued non-native commercial plantation? We disagree that this should be continued, instead natural regeneration should be used.
Concerned that Ancient Woodland and PAWS value is not fully recognised-need emphasis on biodiversity and cultural heritage value.
Recommend AWI section updated to identify key areas in good condition and those not to improve appropriateness of application.
NWSS showed that loss of upland woodland one of main causes of ancient woodland decline in Scotland, should also include veteran trees where isolated and not part of high value forests.
<b>Harvesting</b>
Contradiction between this policy and section on rural development -in most circumstances clearfelling is the most economically sustainable way to manage productive woodland.
Mechanical felling is not appropriate in ancient woods where machinery causes ruts that NN's colonise as the soil acidity reduces.
With regards to the proposed policy that 'clearfelling should be minimised', we do not agree with this or believe it reflects the importance placed on commercial timber production described at the foot of page 25 of the consultation document. Commercial woodland is arguably the best way to optimise tree cover and hence carbon sequestration (by increasing the number of trees per hectare) whilst also providing the greatest incentive to plant woodland as there is an expectation of timber from clearfelling prior to stocking. If clearfelling is discouraged, it will discourage the planting of new woodland and this will be detrimental to the objectives of the draft Strategy at section 1.1. The outcome of such a policy will therefore in our view be less new woodland cover in the CNP compared with

what otherwise might be achieved.
The section on felling is confusing with apparently contradictory statements. It is too simplistic to say that low impact silvicultural systems (LISS) increase species diversity as, if restocking by planting is not to be undertaken, this is reliant on seed sources of alternative species being present and being compatible with objectives of management. The suggestion that LISS cause less rapid change to the landscape and physical environment is directly linked to the type of LISS pursued and is, in many cases, subjective. The statement that “clearfelling should be minimised and seed bearing native trees retained on clearfell sites where possible” is confusing as the retention of seed bearing trees to ensure some continuous forest cover suggests a version of uniform or group shelterwood, not clearfelling. Clearfelling may still be appropriate and there should not be a presumption in favour of LISS but recognition of the need to use the most appropriate silvicultural system for the scale of the woodland.
<b>Biosecurity, invasive species &amp; Wildfire</b>
Recommend that the CFS should provide guidance on avoiding non-natives in development schemes reducing disease risk.
Could ref be made on dangers of importing top soil eg to road verges that then introduce INNS.
Rhododendron removal strategy needs mention. Lodgepole Pine requires removal from Scot's pine sites and in the vicinity.
Need to address possible need to plant non-native species to replace diseased Scots Pine in productive forestry.
Is scope for increasing native pine woods but is a monoculture and so open to disease risk and loss of crop. More emphasis on use of broadleaves and non-natives eg sycamore and southern beech.
<b>Rural Development Agree-75% No -25%</b>
Rural development is at odds with what a National park should be.
No mention of supply chain in the CNP and replacement with local suppliers.
<b>Employment</b>
The Cairngorms has the potential to grow Scotland’s sustainable cities of the future and substantially reduce our global environmental resource footprint; a focus on crafts and social enterprise risks under-ambition and employment becoming ‘theme park management’ instead of sustainable production.
Reads well but do wonder who under 50years will be happy pulling logs out with a horse. And LISS will be costly. Neither will give a sustainable living or competitive wood prices when selling on.
World Heritage Site status would bring economic and environmental benefits
The collapse of investment in trees for timber production following changes in incentives in 1988 will result in timber production reaching a peak within the next 10 years followed by a decline in timber available for processing over the following 20 to 30 years.
Emphasis on eco-friendly small scale woodland based enterprise is outdated, the role of well-designed exotic plantations should be retained.
<b>Productive Woodland</b>
Promotion of national campaigns at a local level eg Wood for Good, Grown in Britain, CNPA purchasing policy on forest products.
Why are European NNS preferred - larch and Norway spruce preferred over Douglas Fir and Sitka Spruce. Sitka spruce produces a financial return and sequesters carbon

substantially faster than any other tree, and is more resilient than Norway spruce. Western red cedar has potential.
Both large sawmills within the CNP rely heavily on spruce logs -define modest proportions of non-natives.
The action 'existing productive forests containing large, even-aged non-native coniferous species should be managed to increase species and structural diversity' is redundant as this is taking place already under UKFS.
The statement "large even-aged non-native coniferous species should be managed to increase species and structural diversity" again fails to recognise the proportion of species within the park (Table 2) and conflicts with the statement on page 15 "and include a wide range of tree species". The need to adjust species balance and structural diversity within individual forest holdings is already addressed through the UK Forestry Standard, as is the management of Ancient Woodland Sites.
Rather than the restrictive proposal, 'the planting of forests designed with future timber extraction in mind is preferred in areas where there is already existing good road access', it would be better to say 'Support development of a strategy for the extraction of timber from areas suitable for timber production'.
Care required when restructuring woodlands that financial viability of the woodland is not lost.
Emphasis should be on creation of productive timber forests not preserving ancient woodland.
Should work with CONFOR to create/promote a Scottish market for Scots Pine timber eg locally sourced campaigns in B&Q.
Clear recognition between commercial forestry and the uneconomic harvesting of naturally regenerated trees.
Productive woodland in the sense of commercial forestry should not be a NP aim.
Recognition that planting regimes, species profile and infrastructure fundamental to economic timber production is at odds with woodland envisioned by strategy.
In general use of NNS increases disease risk in long term eg Scots Pine and NN pines, there may be other good reasons why non-natives used but reference to disease should be removed.
<b>Natural Flood Management</b>
Need to consider receptors outside of the park when looking at priority areas for NFM as planting schemes will alter conveyance, floodplain storage etc. - requires flood risk assessments.
<b>Low Carbon &amp; Carbon Trading</b>
Better to lock up C in wooden energy efficient buildings than use as wood fuel source-beneficial to expand and include figures on potential for C sequestration on an expanding CNP and use of timber cf. The UK Environment Plan targets for carbon trading.
Need to ensure no detrimental impact on wildlife from management of woodland for biofuel eg coppicing and dead wood by cert from UKWAS.
The Woodland Carbon Code for example is a Scottish Government endorsed quality assurance standard for woodland creation projects and can be used to demonstrate project design quality both for anticipation in carbon markets but also for broader business and individual Corporate Social Responsibility (CSR) funding. <a href="https://www.forestry.gov.uk/forestry/infd-88g2ca">https://www.forestry.gov.uk/forestry/infd-88g2ca</a>
Climate change will result in some native species reducing in suitability while non-indigenous may improve.



More consideration for impacts of using more wood fuel on air quality.
<b>Forests &amp; people Yes - 80%, No-20%</b>
These aims are fine in state owned forestry but what about forests under private ownership which need to maximise profit, the strategy will rely on goodwill of landowners and should acknowledge this.
<b>Responsible Access</b>
Need reference to the Capercaillie Framework and link in with it.
Recreational users need to be aware of essential woodland management activities.
Investment into a greater understanding of biodiversity and cultural value of CNP forests which might reduce recreational disturbance to caper.
Who will fund the facilities eg toilets, paths signposting for the greater recreational access?
Not all woodlands close to settlements are suitable for recreation - needs recognition.
Needs some separation of walking and biking access.
Recognition that without increased habitat quality and species recovery might have to restrict access in some places in the future.
<b>Health</b>
WTS - agree that woodland environment underused asset for improving well-being, would be happy to be involved in helping raise awareness of cultural and health benefits. This is especially important close to settlements - new developments need to consider this.
Repetitive of earlier information - Scottish natural heritage not National.
<b>Woodland Creation Map</b>
FSC -the potential extent of woodland generation does not appear to compare to our own assessments of the deliverable potential given all environmental, economic and community objectives that need to be considered.
It is wrong that the target map does not show any non-target areas on the valley floors which doesn't follow the guidelines from the Landscape Character Area Guidelines for Strath in Character Areas to conserve farmed landscapes. Also productive ground for lamb and beef.
Need GWDTE's included in the sensitivities that are difficult to map.
WTS thinks FCS and CNPA should be pro-active in contacting landowners within preferred areas.
WTS- as FGS changes grants may no longer be available - what is future of forestry beyond CAP.
Could be a bit more specific about areas; e.g. how much area is covered by each of the map colours and how you arrive at the annual planting target? How realistic is this woodland creation target given historic achievement? Could more detail be provided for each river catchment area?
This section mentions planting as a means of woodland creation but only refers to regeneration in the opening sentence. As regeneration should be a major method of woodland creation (or expansion) then in the Description column in Table 3 'or natural regeneration' should be added after 'Suitability for planting' (3 occurrences), and also after 'some small scale woodland planting'.

<p>Potential montane woodlands is a layer in this map. The raising of the profile of this habitat and the encouragement of its creation is very welcome. Planting will be necessary in most cases because with one or two exceptions mostly in designated sites there is little opportunity for natural regeneration, but this should not be ruled out. However it is apparent that grazing reduction necessary through fencing does result in changes to the current vegetation; for example in SPAs for dotterel there is the potential for habitat loss. There may also be other impacts from fencing such as bird strike. Therefore any proposals for montane woodland creation within Natura and other designated sites would require careful appraisal, and in the case of SACs and SPAs an HRA.</p>
<p>Montane scrub NWM classes (Sc1, Sc3 and Sc7) are included in both the Potential Areas (with known sensitivities) and the Potential montane woodland categories. This would suggest some overlap which is presumably not intended.</p>
<p>There are apparently more colour categories on Map 3 than in the key – this seems to be because of the use of a coloured backdrop. It would be easier to interpret the maps if a basic white backdrop was used instead.</p>
<p>The section at the end of the draft which illustrates areas targeted for woodland creation (as well as Map 2) is based on the Native Woodland Model published in 2004, This model was developed from earlier soil and climate datasets and our understanding of the requirements and locations of different types of native woodland. It was not designed to accommodate environmental change, and reflected our understanding of the circumstances in the 2000s. Since then we have become much more aware of changing climate and new threats posed by novel pests and pathogens, and we would not recommend its use in planning for the long term mapping of the suitability of locations for specific woodland types – or even the boundaries between high forest, scattered woodland and the non-woodland zone. Since all woodland establishment is long term, we question whether this is a reliable basis for targeting woodland creation at all.</p>
<p><b>MISSING</b></p>
<p>Section on community empowerment in line with SG aspirations.</p>
<p>Section on forest research eg Aberdeen, Edinburgh, Inverness Uni</p>
<p>Promotion of forest strategy - digital media plans eg CNPA, CBP and others promote the strategy and sustainable forestry within the CNP.</p>
<p><b>Other Comments</b></p>
<p>Very positive response from River South Esk as to how the CFS will support delivery of their Catchment Management Plan.</p>
<p>Seafield and Strathspey Estates welcome the support in the strategy for the Forestry Sector and recognition of contribution to local community, community and environment.</p>
<p>Angus Council keen to explore opportunities to work together for woodland expansion in the Angus Glens.</p>
<p>We welcome changes in land management that protect and enhance Scottish Water abstractions.</p>
<p>Landowners will create new woodlands where the incentives provided coincide with their own objectives of land ownership. Mapping areas where the Cairngorms National Park Authority want woodland created may not coincide with the landowner's objectives. There is a danger that too specific requirements and targeting of what new woodland the Cairngorms National Park Authority want where could become counterproductive.</p>

<p>We are disappointed that there is no reference to woodland crofts at any point in the Strategy. It is useful to highlight woodland crofts as a separate entity not least in terms of the opportunities and benefits they bring to the forestry sector. Woodland crofts integrate small-scale woodland management with other land management activities and offer opportunities for housing and business development, thereby contributing to livelihoods and lifestyles. Woodland crofts can deliver on High value farming and forestry, Low impact silvicultural systems, rural development opportunities, sensitive management.</p>
<p>Not given sufficient regard in the draft CNP Forest Strategy 2018 include the following:</p> <ul style="list-style-type: none"><li>(a) The environmental, economic and social costs and benefits of woodland compared with other land uses;</li><li>(b) The difficulties of and risks to woodland establishment in upland areas which are predominant within the CNP (including Invercauld Estate) due to relatively poor, thin soils, high elevation and exposure (giving rise, for example, to increased wind clipping and wind throw risk);</li><li>(c) The risks associated with wild herbivores that can damage young trees. Rabbits, deer and mountain hare all cause damage although hares have been found by the Estate to cause the greatest damage as they 'snip' the shoots off. The Estate has found that broadleaved species are particularly susceptible to being killed by browsing.</li></ul>
<p>Requires more tackling of difficult issues grouse v trees, potential environmental deregulation post Brexit and the need for extensive use of non-natives, climate change.</p>
<p>Rationalise strategic objectives and policy section - similar text dilutes message and is confusing. A potential means of rationalisation could be to identify the objectives as a simple bullet point list or table, with cross reference to the relevant policy/policies. The text providing the context, rationale and detail that is currently split between the objectives and policies sections could then be combined and provided under the relevant policy.</p>
<p>Both the Strategic Objectives and Policy Guidance sections use pale green text boxes to identify specific text. The significance of the text in these boxes is not completely clear - do they contain key messages, objectives, policies or something else? This is a particular issue in the Policy Guidance section where there is no clear identification of what the policies are or what their status is. We assume that the policies are the text in the pale green boxes between pages 18 and 32 of the Strategy. It might be useful to label the policies clearly, for example Policy A, Policy B, etc and to allow cross referencing where the application of one policy might require consideration of another (eg forest habitat networks on page 23 of the Strategy and invasive species on page 26).</p>
<p>It would be helpful for the Strategy to contain a summary explanation of how Maps 2 and 3 were created, eg what information was used, the methodology and limitations, etc. This would enable readers to better understand what the maps show/are unable to show and how the maps might be used.</p>
<p>The Strategy refers to "muirburn management" in several places. Muirburn is a form of management, so referring to "muirburn management" is confusing. If a reduction in muirburn around woodland edges is required to allow natural regeneration, then perhaps this should be stated.</p>
<p>Further to our recent discussions with CNPA, we recommend that broad scale advice for each Natura site is included in the Strategy. We have recently shared our draft site specific advice in the form of a table. This could be provided in an Annex to the Strategy, with the purpose being to help land owner/managers identify what kind of woodland opportunity might be appropriate in particular locations. We are happy to continue to work with you on this (and the associated Habitats Regulations Appraisal).</p>

Table 1 pg 7 – The Habitats Directive is known as the Habitats and Species Directive.

Map 2 - It would helpful to explain the map if a sentence were added to describe the effect of altitude and climate on both the existing pattern of woodland, and the potential for woodland.