Comments on Forest and Woodland Strategy draft supplementary guidance

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
General Comments			
Welcome update to Forest and Woodland Strategy (FWS) and support Strategy's vision and themes including acknowledgement of change in forestry drivers e.g. climate change. Aim of strategic approach to guiding new woodland supported however caution noted against taking too prescriptive a view on this.	A member of the public	The purpose and scope of the strategy is to provide a strategic framework for the development of forestry in Perth and Kinross detailed statements regarding specific priorities, actions for implementation are beyond the scope of this Strategy. Further detail will be provided through individual forest management plans, the Forest Design Framework and other supplementary guidance where relevant (e.g. Green Infrastructure, Landscape Guidance etc.). This will be supported by detailed assessment at the site level on a case-by-case basis to ensure opportunities are realised and any impacts of proposals are suitably considered in line with LDP policy.	No change proposed by the Council.
No comments	Coal Authority	Noted.	No change proposed by the Council.

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Welcome updated response to previous comments on guidance. Content with aims of FWS including spatial data (with further clarifications provided by PKC) developed in partnership with Scottish Forestry. Also welcome production of Policy Map E in LDP2 (as modified) which satisfies previous comments on this issue. Recommend strategy provides clear cross-referencing and alignment with other proposed SG especially Green & Blue Infrastructure & Landscape.	SNH	References to other relevant SG docs will be updated where necessary.	References to other SG docs updated on pages 3 and 8.
The contribution from Scottish Forestry in writing the Council's Strategy is acknowledged by the Council. Scottish Forestry has set out very clearly how it will deliver Scotland's Forestry Strategy 2019– 2029 with considerable guidance. What is far from clear in the earlier part of this document is how the Council will deliver its own Strategy and what will be different from that already covered by the Scottish	Friends of the Ochils	The PKC Forest and Woodland Strategy (2019) is a localised interpretation of the Scottish Forestry Strategy (2019). The overarching visions/objectives of the PKC Forest and Woodland Strategy are considered to be in accordance with the range of objectives contained in the Scottish Forestry Strategy. In terms of delivery, the FWS will support landowners, developers, communities and forest/woodland managers to realise opportunities for the sustainable management of forests and woodland in the Perth and Kinross area, with specific delivery actions noted	No change proposed by the Council.

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Strategy and what Scottish Forestry is providing.		in Section 6 (Priorities, Themes and Actions). PKC are required to set out the framework under which sustainable forest and woodland management can take place in the Council area and alongside Policy 40 of the LDP (2019) the FWS does this through the strategic framework guiding the location of new woodlands as well as setting out the key priorities/themes/actions for the area. Scottish Forestry also co-produced the FWS and no objections have been raised in respect of the relationship between the FWS and Scottish Forestry Strategy.	
The draft SG has been issued in connection with Local Development Plan 2019 although it refers to policy NE2 of the LDP 2014 (page 4). The draft SG should be clear on which policies it supplements and be reviewed to make sure it complies with the relevant regulations before adoption.	RP Planning Ltd	The SG will be updated to include reference to Policy 40 of the Perth & Kinross Local Development Plan (2019).	Updated policy reference on page 4 to <i>Policy 40</i> .

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Cross referencing to Tables within the document should be checked as it is not clear which Table is being referred to in the text. A note should also be added to SG to say that the diagrams (e.g. p14, 17, 18, 27) are only for illustrative purposes only because it is not possible to relate them to specific sites.	RP Planning Ltd	Comments noted. The SG will be updated to include appropriate referencing of tables as well as a note to clarify that the mapping contained in the FWS is at a strategic scale and to be used for illustrative purposes only. The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the <u>Scottish Forestry website</u> alongside other Councils FWS maps.	Updated table/map referencing and added note clarifying the role of the mapping on page 20.
RSPB Scotland was not a stakeholder involved in writing this strategy.	RSPB	RSPB have been invited to comment on the draft SG and PKC welcome their input in this regard.	No change proposed by the Council.
Note that this strategy updates the existing strategy on forest and woodland in order to align with the emerging Local Development Plan 2. In light of this we can confirm that we have no comments to offer on the updated guidance other than welcoming the continued focus on the good stewardship of the historic environment and recognition of the contribution made by forests and woodland to the historic environment.	HES	Comments noted and welcomed.	No change proposed by the Council.

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Number of factors flagged for further consideration including: engagement with appropriate flood risk management authorities; need to consider whether work situated in flood-sensitive catchments where land-use changes could increase flood risk, run-off generation impacts, addition debris sources for watercourses, and climate change adaptation.	PKC – Flooding Team	The UK Forestry Standard sets out the guiding principles under which proposals are assessed and include the following key considerations: Biodiversity Climate change Historic environment Landscape People Soil Water These key themes identify a wide range of considerations that individual proposals will be expected to take in to account. The FWS (as outlined in page 9) identifies that proposals must ensure woodland removal and creation is developed in accordance with the UK Forestry Standard. As such the FWS already ensures that relevant environmental and social factors are taken in to account in the design and assessment process recognising the nationally-agreed standard for forestry/woodland management.	No change proposed by the Council.

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Executive Summary			
 Page 4. The Strategy's aims are set out, but not how they will be achieved: guiding and supporting LDP Policy NE2: specifically; how? in particular, a strategic approach is required to identify areas for woodland creation with indicative, clear mapping. Further consultation is required on this. This strategic approach is required not just across Perth & Kinross covering the Ochils, but also in conjunction with Clackmannanshire Council and Stirling Council to provide a consistent approach across the entire Ochils. 	Friends of the Ochils	The purpose and scope of the strategy is to provide a strategic framework for the development of forestry in Perth and Kinross; detailed statements regarding specific priorities and actions for implementation are beyond the scope of this Strategy. Further detail will be provided through individual forest management plans, the Forest Design Framework and other supplementary guidance where relevant (e.g. Green Infrastructure, Landscape Guidance etc.). This will be supported by detailed assessment at the site level on a case-by-case basis to ensure opportunities are realised and any impacts of proposals are suitably considered in line with LDP policy, particularly Policy 40 (Trees, Forestry and Woodlands). The strategic framework associated with the 2014 FWS SG has been carried forward in to the new draft as part of the 5-year review of the 10-year strategy. The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website alongside other Councils FWS maps and provides consistent, indicative mapping across Council areas.	No change proposed by the Council.

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 Relevant section/paragraph of Guidance woodland removal is set out clearly in a policy document from Scottish Ministers. Perth & Kinross Council needs to a) identify woodland removal as a last resort and b) set out the circumstances when this may be considered. our second comment above applies to guiding development for planting schemes and grant. This requires 		Policy 40 of the LDP (2019) clearly sets out that proposals that involve woodland removal will be considered in the context of the Scottish Government's Policy on the Control of Woodland Removal. Planting grants fall within the remit of Scottish Forestry including associated guidance to support this process. The Councils Strategy map has been provided via the <u>Scottish</u> <u>Forestry website</u> alongside other Councils. The Scottish Forestry website provides detailed information on areas	
 additional guidance for applicants additional guidance for applicants that is also available to a wider audience to be able to understand the implications of these schemes. Examples are the publications available on the website of Forestry Scotland. Further consultation is required on this. Would be pleased to be included in screening and scoping exercises for EIA applications. 		 benefiting from Forestry Grant Scheme funding; forestry Grant Scheme target and eligibility areas; felling permissions and plans; and legacy grant applications to assist with informing woodland creation. In relation to the request to input in to future proposals (both EIA/Forest District Strategic Plans) PKC will ensure that the legislative requirements for consultations are met. 	

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 Relevant section/paragraph of Guidance Would be pleased to be included in the review of Forest District Strategic Plans. 			
Part 1 – Introducing the Strategy			
Introduction needs to be amended to include a better balance including further consideration of significant increase in woodland cover in Perthshire before 18 th and 19 th centuries including coverage in Roy Military Survey of Scotland 1747-55 mapping (much of which is included in the Ancient Woodland Inventory of Scotland). Ochils have considerable area of woodland of cultural importance and for biodiversity.	Friends of the Ochils	The Guidance was developed in collaboration with Scottish Forestry and no updates are considered necessary in relation to introducing the strategy. Specific proposals relating to forests and woodlands within the Ochils area will be able to consider the detailed information which has been highlighted taking in to account the proposal, the site and the surrounding area as well as any relevant historical/cultural information. The SEA has been developed incorporating a range of woodland interests including native woodland, ancient woodland and SSSI (woodland interest), all of which have been included in the spatial framework to help shape the spatial priorities of the FWS.	No change proposed by the Council.

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Relevant section/paragraph of Guidance			
Part 2 – Woodlands and Forests in a Scottish Context			
Page 8 . Reference is made to <i>A Land Use</i> <i>Strategy for Scotland 2016 - 2021</i> , but there is no indication how Perth & Kinross Council will help to support this. The Strategy gives rise to a number of considerations and the Council needs to set out its position on this. Two examples follow in relation to land use decision-making and regional land use partnerships.	Friends of the Ochils	Key visions/objectives associated with the Land Use Strategy (2016-2021) have been considered in the drafting of the Guidance including specific assessment of the compatibility of the overall visions/objectives of both documents. Scottish Forestry has also been consulted on the draft Guidance and raised no comments in relation to the compatibility of the Guidance with other key national strategies. Looking specifically at the two examples provided, neither of these are statutory duties. PKC support the principle of these aims but it is not for the FWS to identify how these will be supported explicitly. It is also important to note that the FWS is specifically a land use planning document so the primary focus is on engagement through planning process although other opportunities for wider engagement should be encouraged where possible.	No change proposed by the Council.

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7.2 Of 10 points listed on page 11 only the last one relating to Forest District Strategic Plans, long-term Forest Design and Management Plans can be imagined how implementation will be achieved through collaboration with SF. Concerns raised how other 9 points will be achieved.	Friends of the Ochils	Ongoing monitoring of proposals submitted to PKC will be undertaken to help inform the review of further strategy work in this sector. Engagement with Scottish Forestry and other relevant stakeholders will also be undertaken to ensure that ongoing and future implementation of key objectives is optimised.	No change proposed by the Council.
Part 3 – Woodlands and Forests in Perth and Kinross Today			
7.3 Query raised regarding the listing of woodland types in table of woodland types on page 13.	Member of the public	Figures are sourced from Scottish Forestry – National Forestry Inventory. For a detailed understanding of data capture and categorisation please see the metadata supplied in the following <u>link</u> .	No change proposed by the Council.

Comment Summary Relevant section/paragraph of Guidance	Received From	PKC Officer response	Change to be made to Guidance
Update text on page 13 to take in to account contribution from oak woods and other broadleaved woodlands to biodiversity.	Friends of the Ochils	Text to be updated to reflect suggested change.	Updated statement on pages 10-11 to add in following text "Oak woods and other broadleaved woodlands in Perthshire provide a similar function and overall provide a greater contribution to biodiversity."
7.4 Concern raised about the statement 'more of the same' on page 15 as the Strategy needs to be explicit about what it aims to achieve and how this is to be done.	Friends of the Ochils	The overall purpose and specific visions and objectives of the Strategy are explicitly set out in the FWS document. As noted above, the overall aims and objectives of the FWS have been considered in relation to the Land Use Strategy and these are considered to be compatible and to reflect the Scottish Government's policy to consider land use including forestry holistically.	No change proposed by the Council.
Text on the following opportunities and challenges (p.15) supported: our woodland heritage, broadleaves for quality timber, farm forestry, connecting and protecting habitats at a landscape scale, landscapes, and placemaking.		Woodland expansion: the FWS Strategy map provides an indicative spatial framework which targets where there are opportunities for new planting as well as the locations of existing sensitivities and constraints at a strategic scale. The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website to guide woodland	 Opportunities and Challenges (p.13) – added further text reflecting suggested changes for: softwood timber production and processing.

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Woodland expansion: there is no reference to where this expansion might take place and qualification is required.		expansion. Proposals will be dealt with on a case by case basis against the LDP policy framework as well as other key national policy and guidance.	 Fuelwood and short rotation crops
Woodland removal: need for Council to set out its policy position on woodland removal. Softwood timber production and		Woodland removal: as noted above Policy 40 of the LDP (2019) clearly sets out that proposals that involve woodland removal will be considered in the context of the Scottish Government's Policy on the Control of Woodland Removal.	
processing: need for Council to consider transport impacts from any timber haulage and provision of sawmilling facilities.		Softwood timber production and processing: potential transport impacts from timber haulage is recognised as an important issue and SG text will be updated to reflect this.	
Fuelwood and short rotation crops: short- rotation broadleaves should not be viewed solely as a source of fuel as they can provide a market for traditional crafts, with a further benefit of tourist interest. This could also provide a market for furniture, indoor and outdoor. The use of wood for these purposes sequesters carbon for a much longer period than the use for wood fuel.		Fuelwood and short rotation crops: Priority and actions included to encourage the development of local timber markets by local businesses, particularly markets based on wood fuel and added value craft products (p.30). Indicators of progress include training and skills measures such as number of people enrolling or registering for forestry related short courses, qualifications and Modern Apprenticeship programmes. Potential market of short rotation crop from broadleaves for traditional crafts is recognised and SG text will be updated to reflect this in the Opportunities and Challenges section.	

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 Community and urban-fringe forestry: this is supported, but there must also be assistance to meet the pressures from public use. Climate Change Adaptation: the principle of planting trees for sequestering carbon is proven as is their use in flood control. The use of wood fuel has to be treated cautiously; it has been and continues to be a source of pollution in the UK and other parts of the world. A recent publication provides advice: <i>The Potential Air Quality Impacts from Biomass Combustion</i>, DEFRA, 2017. 		Community and urban-fringe forestry: proposals for community and urban-fringe forestry are supported and any issues with particular pressure(s) from public use will be dealt with on a case by case basis depending on the individual characteristics of the site and surrounding area and any ownership/maintenance regime proposed. Climate Change Adaptation: comments noted. PKC Environmental Health are consulted on proposals where there may be an air quality issue.	
Recommend expanding existing wording to identify carbon rich soils should be protected in line with LDP policy as they are carbon stores and have a role in climate change mitigation.	SEPA	The SG will be updated to include explicit reference to the protection of carbon rich soils as a climate change mitigation measure.	Added new challenge 'Climate Change Mitigation' to page 14 and include reference to CR soils.

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Part 4 – Achieving the Vision			
Whilst some of the vision is desirable the following page fails to demonstrate how the vision will be realised and what the Council will do towards this.	Friends of the Ochils	Page 18-19 of the draft FWS outlines the priorities and key themes PKC will utilise to assist in achieving the vision set out on pages 17-18. The priorities and themes set out pragmatic steps to assist PKC – alongside key stakeholders – in achieving the overall vision, which is considered to be in accordance with the overall vision of the Scottish Forestry Strategy.	No change proposed by the Council.
Local Priorities - Four strategic priorities are set out in the Draft SG (page 21). Policy 40 (Forestry, Woodland and Trees) states that the Council will support proposals which, amongst other matters, meet "local priorities". It would be helpful if the SG could explain what such local priorities are or could be.	RP Planning Ltd	Local priorities will be considered on a case by case basis taking in to the individual characteristics of the site and surrounding area and the nature/scale of the proposal to be considered. This approach is considered to be a pragmatic and non-prescriptive way to consider local priorities in relation to forestry/woodland proposals. For example, a local priority for a specific geographical area may suggest the planting of a particular native tree type to support specific biodiversity objectives.	No change proposed by the Council.

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Relevant section/paragraph of Guidance			
Page 20 should include clear reference to the priority native woodland habitats in the Tayside LBAP 2016-2026. Guidance should also include more ambitious aim in relation to black grouse recovery for 2034. Open ground habitats are not just important in the uplands, lowland wet areas are also important for breeding waders.	RSPB	Section to be updated to make specific reference to supporting priority native woodland habitats as identified in the Tayside LBAP. Comments in relation to black grouse and importance of specific land characteristics for breeding waders are noted however the vision on p.17 is intended to be a high level, strategic vision delivered through the key priorities and themes in Part 6 so no additional changes considered necessary.	Part 4 – Achieving the Vision – page 20/1. Updated text to refer to Tayside LBAP.
Support commitment to UK Forestry Standard being material consideration and proposals should accord with the Forestry Standard.	SEPA	Comments noted and welcomed.	No change proposed by the Council.
Part 5 – Geographic Priorities for Woodland and Forestry			
Page 23. Seek copy of Forest Research as referenced in the FWS. While many of the statements might be supported on this page, the guidance following is too simplistic to be meaningful, including the map on p27. This section is so poor that there is no meaningful guidance to comment on.	Friends of Ochils	This refers to the Landscape Capability for Forestry research undertaken by the Macaulay Land Use Research Institute (JHI). <u>https://soils.environment.gov.scot/maps/capability-</u> <u>maps/national-scale-land-capability-for-forestry/</u>	No change proposed by the Council.

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		The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website. See also comments below on mapping.	
Local Sensitivities The guidance at page 26 emphasises that proposals for woodland restructuring, creation and expansion need to be assessed on a case-by-case basis to take account of local sensitivities. This is welcomed. But in addition, other matters such as 'constraints' should also be taken into account.	RP Planning Ltd	Specific reference to 'constraints' will be added to reflect that proposals will take account of both sensitivities and constraints, in line with the 3 rd paragraph of page 10 (purpose and scope).	Guiding the Location of New Woodlands – page 23: Added in reference to 'constraints' on page 23.

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Recommend that the specific reference to blanket bog within the land use constraints referred to in this section is expanded to carbon rich soils as this is in keeping with local development plan policy. Recommend that the wording of the second paragraph on page 24 is expanded to clarify that proposals will be required to take account of local sensitivities in line with the most up to date data and guidance.	SEPA	The SG text will be updated to include explicit reference to the protection of carbon rich soils including taking in to account most up to date data and guidance in line with LDP Policy 51 (Soils).	 Guiding the Location of New Woodlands – pages 20-21: Added in specific reference to carbon rich soils (p.20) Added in suggested text to second paragraph of p.21
Part 6 – Priorities, Themes and Actions			
Draft FWS clearly recognises both the values of native woodlands & that our remnants are under pressure within Perth & Kinross - one of the strongholds for native woodlands in Scotland. Following recommendations suggested to help implement various aspirations in FWS:	Member of the public	The removal of woodland and forested areas is subject to the Scottish Government's Policy on the Control of Woodland Removal. This policy is in accordance with the Climate Change Plan as well as the UK Forestry Standard and therefore identifies the circumstances under which removal is deemed to be acceptable including issues surrounding climate change in relation to tree removal. As the policy framework for woodland removal is already set at the national level (and recognised in Policy 40 of the LDP (2019)) it is not considered necessary to add in additional text in this regard.	No change proposed by the Council.

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Native woodlands have been in decline in Perth & Kinross (& elsewhere) for many years. Such woodlands represent our richest terrestrial wildlife habitat & I recommend that your Supplementary Guidance flags this up. Your Guidance should also flag up the key importance of conserving natural habitats to help avert the Climate Emergency. Building developments both adjacent & within native woodlands are incompatible with maintaining habitat integrity. The such siting of these developments should therefore not be permitted in future. This cannot be mitigated by habitat creation elsewhere, as native woodland remnants, with their genetic integrity going back 8000 years, cannot be replicated.		In addition, existing native woodland and new planting areas will be managed in line with UKFS guidelines for a range of benefits, and seek to minimise future risks from climate change, for example from tree pathogens, through the creation of forest habitat networks, and using diverse tree species, improve the quality of life and well-being of people by supporting community development, encourage outdoor education and encourage the use of UK Forestry Standard and relevant Forest Guidelines to protect water and soil resources, including riparian and upper catchment planting (see Part 6 Priorities, Themes and Actions).	

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Page 29 - Proposal for review is supported.	Friends of the Ochils	Comments noted and welcomed.	No change proposed by the Council.
Page 40 include The Allan water catchment project which includes riparian planting and is a partnership project with SEPA, SNH, Forth Fisheries Trust and RSPB Scotland. Page 42 we welcome the opportunities for action. Page 43 welcome that area of native woodland is an indicator.	RSPB	Update text on page 40 to include Allan Water Catchment Project.	Part 6 – Priorities, Themes and Actions – Priority 4 (p.36): Updated text to include reference to the Allan Water Catchment Project.
Maps			
Improvements could be made in the quality of the maps to allow readers to identify locations. As currently presented, the maps do not readily allow this to happen, which does not sit well with the aim of addressing uncertainties expressed on page 10.	Member of the public	The purpose and scope of the strategy is to provide a strategic framework for the development of forestry in Perth and Kinross and inform decisions about the location of all types of new woodland. The maps provide a strategic scale guide to the appropriate locations for forestry to minimise the likelihood of undesirable environmental or social outcomes. The conceptual map has been designed to	Part 3 – Woodlands and Forests in Perth and Kinross Today: Add note to maps on pages 15, 16 and 24 to clarify purpose of maps with

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Relevant section/paragraph of Guidance		provide clarity and communication of key messages at a	instructions how to view
 Page 17. Information on 'Sensitivities' map is poorly presented. All that can be said is the Strategy has failed to address the subject. Page 18. The 'Opportunities' map is little better. It indicates better agricultural land for tree planting and while some may be possible, higher land values in the lowlands and falling incomes in the uplands will direct woodland planting to the uplands. The Strategy has failed to recognise the pressures on the Ochils and how to deal with them. 	Friends of the Ochils	strategic level in line with Skeleton mapping approach taken at a national level (Scottish Government). Map design has been developed in partnership with the Scottish Government for the purpose of conveying a clear message to a wide audience. A note will be added to the maps on	individual map legend entries. Part 5 – Guiding the Location of New Woodlands: Added link to SF website for detailed mapping for FWS on page 20.
Highlight that we have found the mapped output within the strategy difficult to read.	SEPA		

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Generally support themes 1-7. Theme 5 (Access and Health). "Appropriate tourism infrastructure" is not sufficiently defined, even with the addition "such as interpretive centres". There is a current trend towards trivialising the importance of rural culture, to provide instant gratification for a less than well informed public. Friends of the Ochils seek further consultation to ensure sensitive infrastructure is provided with a true, quality experience	Friends of the Ochils	In relation to the comment on <i>Theme 5 Access and Health</i> PKC consider that the term 'appropriate tourism infrastructure' is suitable and provides scope for specific proposals relevant to the site and surrounding context to be developed.	No change proposed by the Council.