Woodland Trust Scotland (WTS) welcome the opportunity to give our views on this Proposed Plan.

The comments that follow are delivered on behalf of UK’s leading woodland conservation charity. We have four main aims: ensuring no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland creation and increasing people’s understanding and enjoyment of woodland.

We own over 1,000 sites across the UK, covering approximately 27,000 hectares (ha). In Scotland we own and care for around 60 sites covering in excess of 11,300ha which include Ben Shieldaig and Loch Arkaig. We combine the promotion of public access with forestry, farming and conservation of the natural and cultural heritage. The Woodland Trust has 500,000 members and supporters.

Do you think the 13 Strategic Objectives in the proposed National Islands Plan are the right ones to meet the needs of island communities?

The wording on ending climate change in strategic objective 9 ‘To ensure that Scottish islands are at the forefront of contributions to our ambition to end climate change’ is inaccurate. Climate change is not something that can be ended in itself, the reference here should be to ending the anthropogenic contributions to our changing climate. Anthropogenic activity is accelerating climatic changes beyond the rate at which society can adapt to and mitigate the negative impacts of climate change.

Are there any issues which have been overlooked in the Strategic Objectives?
We feel that the actual delivery and tangible actions have been overlooked in this proposed Plan.

Are there any Strategic Objectives that should be given a higher level of priority within the proposed Plan?
N/A

Do you think the proposed Plan sets out both a clear strategic direction and practical approaches to delivery of the Strategic Objectives?
The proposed Plan does set clear strategic direction to the delivery of the objectives, but there is a lack of practical approaches, deliverable action and implementation. We understand that as part of Objective 13 on implementation
there will be a further Implementation Strategy to be produced, however, the logical place for such a strategy would be in this plan itself. Furthermore, WTS believes that the issue of adequate resources is not addressed in this plan; it is unclear at this stage how the practical approaches to delivery would be actioned without resourcing.

Do you have any comments on the actions outlined to support effective implementation of the proposed Plan?

WTS is very pleased that the role of woodland creation and forestry is recognised as part of two of the objectives: Strategic Objective 2 on sustainable economic development, and Strategic Objective 9 on islands being at the forefront of contributions to ambitions on tackling climate change. Woodland creation also ties in with Strategic Objective 8 on environmental wellbeing and deal with biosecurity. The Implementation Strategy should contain specific targets for these, as well as indicators to measure success, and the allocation of resources, together with a clear way forward for implementation. The provision from the Planning Act on local authorities having to produce forest and woodland strategies, and the provisions in the Climate Change Bill on land use frameworks and their resourcing, tie in with the woodland creation and forestry objectives in this Plan. These ensure that the islands, which for the most part have not produced these strategies, will now be in a position to develop and implement such strategies. Support from Scottish Forestry, as well as WTS, and other stakeholders, will be very important in the production of these strategies on the expansion of forests and woodlands on the islands, while recognising wider land-use objectives and the benefits to the islands populations and environment which these developments can bring. While the need to enhance biosecurity is recognized throughout the proposed Plan more specific ways to deliver should be added to the finalised Plan such as the need to prevent invasive non-native species (INNS) from getting there and the need to develop a strategic response to deal with INNS to eradicate, if they do get there. However, overall, there is a lack of tangible action and ways to deliver the objectives in this proposed Plan.

Do you think the proposed Plan adheres effectively to its stated principles that it is “fair, integrated, green and inclusive”? If not, how might its adherence to any or all of these principles be improved?

We can comment on the ‘green’ principle. As stated above, we are very pleased for the recognition of woodland creation and forestry as part of the proposed Plan. Recent uptake for woodland creation on the islands has transformed livelihoods and landscapes, and we would like to see further support for this ambition around woodland creation and the continuation of this momentum. Woodland creation and forestry are part of the appropriate measures and land uses to ensure that the plan adheres to the ‘green’ principle, but they of course contribute to the other principles because of the
many benefits they deliver. A specific example would be woodland creation on crofts which provides shelter for livestock, enhances landscapes, livestock and buildings, reduces domestic fuel bills, enhances landscapes, leads to an increase in biodiversity and acts as a carbon store, provides a sustainable source of wood fuel, and provides material for craft use. Added to these benefits is the variety of jobs supported, both local and off-island: fencing, machinery work, tree nurseries, tree planting, and maintenance work.

The Islands (Scotland) Act 2018 sets out longer term timescales for Scottish Ministers to report on and review the Plan. Does the proposed Plan have sufficiently clear targets and measurable indicators by which to measure its performance? The proposed plan does not have any clear targets or measurable indicators. In fact one of the strategic objectives is the support for the implementation of the Plan which states that ‘a detailed implementation strategy setting out clear actions with defined responsibilities for action and timescales’ is to be established. It is also stated that indicators are to be developed. These targets and indicators should be part of the finalized plan and should be consulted on with relevant stakeholders. In addition to this, under strategic objective 13 on the implementation of the plan, the need for adequate resources to support the implementation must also be stated. We know that our islands have their own challenges, many different from those on the mainland. They also hold many unique opportunities for development which will need adequate resourcing. To give a specific example, the Trust’s own Croft Woodlands Project, which has had high uptake on the islands has highlighted some of the constraints to woodland creation which are specific to the islands. As a result, there are now increased rates of funding for elements of planting schemes such as deer fencing.

Does the proposed Plan align with the Scottish Government’s renewed focus on climate change issues, following its announcement of a climate change emergency? The word ‘emergency’ denotes urgency to act. We are uncertain the provisions in the plan and the lack of clear ways to for implementation will mean that the ambitions on addressing climate change issues will be addressed with urgency.

Does the proposed Plan deliver against the Scottish Government’s own National Performance Framework, and the underpinning Sustainable Development Goals? We think that the proposed Plan aligns with the National Performance Framework, but as stated throughout this response, we are uncertain of how delivery will be taken forward.