



Mountaineering Scotland

LLTNP Trees & Woodland Strategy response

31 May 2019

<https://www.lochlomond-trossachs.org/park-authority/get-involved/consultations/treesandwoodlands/>

#### QUESTION 1

a) Do you agree with the vision? There is little to disagree with the vision statement. The headline statement is rather bland – it could be made into something more inspiring.

b) Is there anything you would change about the vision? There is nothing in the vision to indicate the desire to develop natural treelines up hillsides in parts of the Park. It may be implicit in the description, but a statement of intent to allow, in places, natural woodland development to its natural extent would be visionary.

#### QUESTION 2

a) Do you agree with the seven objectives and rationale?

The seven objectives cover a wide range of woodland and woodland management aspects. There is nothing that we would disagree with. The recognition of herbivore impacts is an essential point to emphasise. We welcome the attention given to the landscape and wild qualities of land through the Landscape Toolkit. We agree with the promotion of active recreational pursuits in woodlands and the cross-referencing with other recreation strategies.

b) Are there any changes you would make to the objectives and rationale?

Objective 3 Protecting and Enhancing the Landscape: We think that woodland design parameters should include potential harvesting impacts and forest infrastructure like roads, as well as planting design.

Objective 7 Encourage and Promote Public Access for Recreation and Improving People's Quality of Life: We agree with the objective, but think that more could be made of both public and private forestry/woodlands' contribution to promoting access, beyond new tracks for woodland management. They tend to be wide, surfaced haulage roads following contours. More narrow paths are more appealing and can aid passage through woodland up and down the hill following the desire lines of recreational users.

#### QUESTION 3

a) Do you agree with the Management of Existing Woodlands section? In general, yes.

b) Is there anything you would change about this section? Improvements in woodland condition are more than just stand diversity. The policy may benefit from a statement that woodlands are an ecosystem, not just a collection of trees – the plant and fungi component is essential for diversity. This would explain the desire to focus on Designated Sites and Ancient Woodland.

Management of herbivores to sustainable levels requires more definition of what sustainable means. Deer control is effective across a range, not site specific.

Productive conifer forests – A National Park should have higher standards of land management than other parts of the country. A strong steer could be given by stating that large clear-fell coups are a thing of the past. ‘Careful planning and construction of forest roads and other infrastructure’ could be helpfully linked to the Parks Special Landscape Qualities, that is, appropriate to the locale. Standard design specifications may not be appropriate and flexibility of design is required.

#### QUESTION 4

a) Do you agree with the Targeting Woodland Creation section? Yes, and we think that opportunities mapping may be helpful to place the right tree in the right place. The statement to encourage more wind-firm coupes will help reduce the need for large-scale felling and should improve the appearance of the landscape.

b) Is there anything you would change about this section? We agree with the statement that fencelines can adversely impact on landscape and recreational access. We would like to see an intent to manage herbivores that reduces the need for fencing and allow for more natural woodland regeneration, leading to natural treelines developing in a few identified places.

#### QUESTION 5

a) Do you agree with the strategy guidance on habitat enhancement? Yes. Montane woodland and natural treelines would be a major benefit for landscape and wildlife. Climate Change and tree health – agree with the need to raise public awareness of biosecurity and fire-risk in woodlands

b) Is there anything you would change about this strategy guidance? Some emphasis on natural regeneration of existing stands of montane woodland being preferable to planting, with planting being an option where no seed source exists. Herbivore control is essential and best done without fencing, for landscape and access reasons.

Restructuring of Productive Conifer: more emphasis on the desirability for soft upper edges for landscape and wildlife reasons.

#### QUESTION 6

a) Do you agree with the strategy guidance on landscape integration and special landscape qualities?

We strongly endorse the statement - Sensitive design of the transition between forest and open areas can be achieved using varied planting densities, species diversity and open ground. These design principles can also be applied adjacent to recognised recreational routes, both formal and informal, to create a varied experience for users.

b) Is there anything you would change about this strategy guidance? Make more mention in the chapter of wild land qualities as an important feature of the landscape experience. The Landscape Capacity Study recognises them.

#### QUESTION 7

a) Do you agree with the strategy guidance on landscape integrating woodland and other land use? In general, yes. We welcome the recognition of importance of open ground habitats and peatlands in the uplands, as well as the challenges faced by deer management and the rationale to reduce deer fencing.

b) Is there anything you would change about this strategy guidance? There is an omission of National Scenic Areas in the Designated Sites section. It may relate to the Special Landscape Qualities, but NSAs have a legal status that should be recognised.

Related to this is the need for inclusion of Wild Land Areas 6, 7, and 10. These are not designated sites as such but are recognised as of National Importance in Scottish Planning Policy (paragraphs 200 & 215) and the National Planning Framework 3 (paragraph 4.4).

We believe it would be helpful to define what sustainable management of wild deer actually means. We agree with the need for control over their wild range but also there is a need for a more natural herbivore/predator balance in the hills for natural regeneration without fencing. Deer are part of the wild herbivore balance, but voles and hares play a part too. More natural predators are needed to manage them. This may be controversial, but is part of restoring a natural balance.

#### QUESTION 8

a) Do you agree with the strategy guidance on social and rural economic development? In general, yes

b) Is there anything you would change about this strategy guidance?

Forest Roads and Tracks – we welcome the agreement on process, but query what road specifications would be for individual areas. Forestry standard of 3m width may be acceptable for extraction, but is visually intrusive, especially if constructed during the planting phase. We think that this is not acceptable for a National Park. Planting an area can have a narrower track specification, and extraction routes may be restored down again. Higher standards must be applied in a National Park than to the rest of the country.

#### QUESTION 9

a) Do you agree with the strategy guidance on woodlands and people? Yes, it is important that people and recreational access are part of woodland management

b) Is there anything you would change about this strategy guidance? Yes. We suggest changing the section heading from 'Responsible Access' to 'Access Rights and Responsibilities'. This makes it clearer what is meant, and reflects the wording and intent of legislation and guidance in the Scottish Outdoor Access Code.

On the content of signage, signs need to be of minimum area required as well as duration. We support the statement on adequate gate provision for access takers – not just for formally recognised paths, but also for popular informal routes from roadside to hill tops.