

Response ID ANON-HA2B-XND6-W

Submitted to UK Forestry Standard: draft updated content
Submitted on 2022-12-06 15:01:17

Questions

1 Do you think that the draft content of the new edition of the UKFS has improved how cross-cutting themes, such as those explored in the 2021 consultation, are integrated throughout the Standard?

No

I think cross-cutting themes could be better integrated in the new UKFS by :

(Note: Due to the structure of this question, we have been forced to answer 'no'. Had we been given options to answer 'don't know' or to explain or caveat a 'yes' answer, we may have answered differently)

We remain sceptical about how these 6 'cross-cutting themes' were arrived at from the first consultation and their relevance as the overarching guiding themes of the review. They do not appear to have greatly influenced the changes that have been made to the Historic Environment Chapter, which contains little reflection on most of these areas. Rather, the chapter is more stand-alone than in the previous version of the Standard, as cross-referencing has been removed.

We do think that there would have been further opportunities to talk about different stakeholders and public involvement with reference to the historic environment within chapter 5, as well as other potential synergies between the historic environment and forest resilience, climate adaptation, and biodiversity – which are not covered at all. This is a missed opportunity.

More important that these suggested themes, we feel, is the interconnection between the various chapters of the document. We welcome statements on page 6 in Chapter 1 that the seven chapters are interdependent and must be considered together. This should be visually highlighted as clearly as possible in the final presentation of the document to make sure that it is not missed by practitioners. A 'box' - as used, for example, on page 8 - might be a useful tool to explore what this interdependence may look like in practice, explaining, for example, how the historic and natural environment interact, and why they need to be managed recognising this interdependence. Such a diagram may help to offset the lack of reference to cross-cutting relevances within each chapter.

We are concerned that there are almost no references to the cross-cutting relevance between chapters. This means that there is very little understanding developed in the document about interdependence or opportunity arising from an integrated understanding as implied on page 6. For example, the historic environment and landscape are not cross-referenced or referred to in relevant contexts in Chapters 5 and 6. Sections of Chapter 6, e.g. 'Forest landscape design' have very clear cross-cutting relevance to the historic environment. While we accept that the avoidance of repetition of guidance has been an editorial choice made in this review, the current drafting is liable to promote an unhelpful siloisation of issues, where a more integrated understanding would be desirable.

2 Do you think that the draft content of the new edition of the UKFS remains applicable in all four countries of the United Kingdom?

Yes

I think the draft UKFS could be made more applicable in all four countries by:

3 In your opinion, does the draft content of the new edition of the UKFS achieve the right balance between providing clear and consistent requirements and guidelines and the need for some degree of flexibility to accommodate national, regional and local differences and contexts?

No

I think the balance between clarity and flexibility could be improved by:

(Note: Due to the structure of this question, we have been forced to answer 'no'. Had we been given options to explain or caveat a 'yes' answer, we may have answered differently)

We feel that the distinction between requirements and guidelines presents no problems in the accommodation of national, regional and local contexts. However, do not feel that this UK-wide scope is any reason to perpetuate UKFS' relative toothlessness when it comes to setting out guidelines that encourage good practice on issues not subject to legal requirements. We are disappointed that the review has not been able to consider the efficacy of guidelines and whether the UKFS' approach could be modified - for example by requiring that developers provide evidence of their 'consideration' and provide clear reasons if they choose not act on particular GLs. We have been told that this was unfortunately out of scope of this 'technical review'.

4 Do you think that the draft content of the new edition of the UKFS strikes an effective balance between the economic, environmental and social principles of sustainable forest management?

Not Answered

I think the balance between the economic, environmental and social principles of sustainable forest management could be improved by:

5 Do you think that the draft content of the new edition of the UKFS provides greater clarity than the current version on what is required of forest managers?

Not Answered

I think greater clarity on what is required could be provided to forest managers by:

6 Do you have any other comments you would like to make about the draft content of the new edition of the UKFS?

Yes

I would like to comment that:

We welcome many of the changes made to the Historic Environment Chapter of the revised document. Requirements have been improved, with certain gaps in the previous version plugged. Guidelines are clearly articulated. New sections in 5.1, for instance on archaeological survey, and evidence of the historic environment, are helpful additions which improve the overall guidance. We feel that there would be scope for extending the Good Practice Requirements to cover more of these aspects from section 5.1 to ensure they influence practice. In particular, we recommend new GPRs relating to involving historic environment specialists to inform decision-making, and the requirement for archaeological survey undertaken by suitably qualified and experienced historic environment professionals.

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We question whether the complex language relating to feature, asset, object, setting, 'historic environment potential', cultural significance, etc could have been explained more simply, or existing definitions for these concepts drawn upon in glossary definitions. While we are pleased that the concepts and relevance of the historic environment has not been over-simplified, we consider that those unfamiliar with these concepts may struggle with the various terms and their definitions in the glossary, which cross reference each other. An addition of a graphic to explain these terms and their relationships may be helpful.

There are two references in the document to 'literary associations'. While we agree that the cultural importance of associations with works of literature are potentially worthy of consideration as described, we question whether authors were intending for a broader reference to 'cultural association'. We believe that this would be more appropriate. Cultural association would include literary association, but other artistic mediums, as well as myth, folklore, tradition, or other public interest. We note that the Landscape chapter refers to 'historic, cultural, and literary associations' which we find to be a much more helpful term.

We would welcome illustrative case studies to support the understanding of guidance in practice. These could be inserted into the UKFS main document, or produced to sit alongside it in a separate document.

7 Are you aware of any evidence that has been published since 2017 on sustainable forest management, that should be considered when finalising the content of the next edition of the UKFS?

No

Here you are able to upload a file containing evidence that should be considered when finalising the content of the next edition of the UKFS::

I have a file to upload of evidence on sustainable forest management (published since 2017) that should be considered when finalising the next edition of the UKFS:

No file uploaded

About you

1 What is your name?

Name:
Rob Lennox

2 What is your email address?

Email:
rob.lennox@archaeologists.net

3 What is your organisation?

Organisation:
Chartered Institute for Archaeologists

4 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

5 We will share your response internally with the government officials involved in delivering the review of the UKFS. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Forestry to contact you again in relation to this consultation exercise?

Yes

6 I confirm that I have read the privacy policies below and consent to the data I provide being used as set out in the policies.

I consent

Evaluation

7 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly dissatisfied

Please enter comments here.:

We feel that the questions were unhelpful in their structure, only offering yes/no choices. We needed a 'don't know' option. We also needed an option to explain and caveat our 'yes' answers. It may not have been the intention to restrict this, but the wording of the questions implied it.

We have also noted verbally already our dissatisfaction with the restrictive nature of the first consultation, which we feel did not provide a broad enough basis for meaningful contribution.

Finally, we are frustrated that many issues of interest for our organisation were considered out of scope for the review. A more full review of the UKFS' effectiveness will need to be undertaken in due course.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: