

Red Squirrel Strongholds Consultation Response Form

Name: Neil Cowie

Organisation: Royal Society for the Protection of Birds¹ (RSPB Scotland).

Postal Address: Dunedin House, 25 Ravelston Terrace, Edinburgh, EH4 3TP

Consultation title: RED SQUIRREL STRONGHOLDS²

1. Are you responding as: (please tick one, or delete those that don't apply)

√	The owner or manager of part of a proposed stronghold area (go to 2a)
	Another individual or land manager (go to 2a)
	On behalf of a group or organisation (go to 2c)

2a. INDIVIDUALS:

Do you agree to your response being made available to the public (in Forestry Commission library and/or on Forestry Commission website)?

	Yes (go to 2b)
	No, not at all. We will treat your response as confidential.

2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (**please choose one** of the following)

	Yes, make my response, name and address all available
	Yes, make my response available, but not my name or address
	Yes, make my response and name available, but not my address

2c. ON BEHALF OF GROUPS OR ORGANISATIONS:

Your name and address as respondees will be made available to the public (in the Forestry Commission library and/or on Forestry Commission website). Are you content for your response to be made available also?

√	Yes
	No

3. SHARING RESPONSES/FUTURE ENGAGEMENT

We will share your response internally. Are you content for the Forestry Commission to contact you again in the future in relation to this consultation response?

√	Yes
	No

¹ The Royal Society for the Protection of Birds is a registered charity: Scotland no. SC037654; England and Wales no. 207076. We own and manage about 8,800 hectares of woodland in the UK, about 60% of which is in Scotland.

Our UK forestry-related work includes advocating changes to country and regional policy, providing advice on conservation management to woodland owners and managers, and undertaking research into birds and other biodiversity affected by forestry practices. A summary of our forestry policy work is at:

www.rspb.org.uk/ourwork/policy/forestry

² See: <http://www.forestry.gov.uk/forestry/INFD-7Q2MHA>

4. CONSULTATION QUESTIONS

Introduction

The RSPB supports the conservation and enhancement of red squirrel populations and range in Scotland.

We are a member of the Scottish Squirrel Group and contributed to the development of the Scottish Red Squirrel Action Plan. We have significant red squirrel populations on a number of our Scottish nature reserves, and we carry out positive management to maintain appropriate conditions for red squirrels along with other important biodiversity on these sites. We also run public viewing schemes for red squirrels in order to raise awareness of this species in the wider woodland context. Red squirrel is a Key Performance Indicator species within RSPB's Nature Reserves Conservation Strategy and we are committed to conservation delivery for this species.

RSPB Scotland has some concerns that red squirrel strongholds might be inappropriately implemented, causing possible negative biodiversity impacts on other priority species, priority habitats and designated nature conservation sites. We hope that these concerns can be resolved and we will be pleased to work with Scottish Natural Heritage, Forestry Commission Scotland and other relevant partners, to develop a positive way forward.

1. Do you agree with the **rationale and justification** for strongholds? If not, why not?

The RSPB supports the targeted implementation of habitat management for red squirrels that complements work for other priority species, habitats and designated sites.

It is important that Scotland's woodland is managed to improve its biodiversity quality for priority species, priority habitats and designated wildlife sites. This includes native pinewood - plantation Scots pine as well as ancient semi-natural Caledonian pinewood - other native woodland, mixed woodland and non-native conifer plantations. Such work is needed to benefit the red squirrel, but also for priority species including capercaillie and black grouse (like red squirrel, both of these are Scottish Forestry Strategy priorities), and a number of other important non-avian species e.g. twinflower, stump lichen.

In particular, we emphasise that poor dispersal ability is a general characteristic of much woodland wildlife. Fragmented woodland supports reduced species richness due to 'island' effects, and this is exacerbated by the inability of many species to disperse between woodland patches. The establishment of red squirrel strongholds must not increase the fragmentation of species rich woodlands, or undermine their inter-connectivity.

Native pinewood conservation must meet the targets agreed in the Caledonian Pinewood UK Biodiversity Action Plan, and targets for other priority habitats such as wet woodland and peatland. Red squirrel and native pinewood conservation must also support the conservation status of designated sites, including EU Special Protection Areas and Special Areas of Conservation.

Red squirrel strongholds must be implemented in line with the priority species, habitats and designated site commitments of the Scottish Forestry Strategy, Scottish Biodiversity Strategy, the UK Biodiversity Action Plan and EC Birds and Habitats Directives.

New woodland for red squirrels must be located away from priority non-woodland habitats and designated sites, and away from areas supporting priority species such as breeding waders. RSPB Scotland would not welcome the creation or retention of low biodiversity quality forestry plantations as action for 'red squirrel strongholds'.

Establishing red squirrel strongholds may be a useful interim conservation measure for this species, but it should not deflect focus or resources from planned, targeted and effective humane grey squirrel control. **In the long-term, the creation and management of red squirrel strongholds should be reviewed as more effective options for targeted red squirrel conservation emerge**, for example the development of effective and sufficiently species-specific immuno-contraception techniques and/or a vaccine for the squirrel pox virus.

2. Do you think that the **management approach** for strongholds is appropriate to achieve their objectives? If not, why not?

RSPB Scotland is concerned that an exclusive focus on the management for red squirrels within areas of native pinewoods, may conflict with existing nature conservation objectives on both designated and undesignated sites.

There are elements of the stronghold proposals, which may help maintain viable red squirrel populations, which we would welcome. RSPB Scotland has **concerns about the approach to native pinewood remnants and plantation Scots pine.**

Specifically:

- a) Retaining some conifers into old age & diversifying the species and ages of trees
It is important that the establishment, design and management of red squirrel strongholds, and red squirrel habitat management outside these strongholds, produces high biodiversity quality diverse woodland habitats.

Forestry Commission Scotland and Scottish Natural Heritage must produce design and management guidance for red squirrel strongholds to ensure the conservation of other priority species, such as capercaillie, black grouse, Scottish crossbill, other priority non-avian species, priority habitats and designated sites.

This would ensure appropriately located and designed forest planting and restructuring. Designated native woodland sites could be judged as in 'unfavourable' condition due to inappropriate tree species selection in restructuring. It is therefore vital that the red squirrel habitat enhancement is done in a way that does not conflict with the achievement or maintenance of favourable conservation status of statutory UK and EU nature conservation sites.

RSPB Scotland would welcome the opportunity to input to the development of forest management guidance for red squirrels within and outside strongholds, in particular restructuring approaches, the location of new woodland and criteria for stronghold selection and review.

- b) Making sure the woods are well connected
It is important that state and private sector long-term forest plans for non-squirrel priority species, such as capercaillie and black grouse, are not compromised by the proposals to link or buffer red squirrels patches. **The boundaries for red squirrel strongholds must take account of existing long term forest plans for other priority species and designated nature conservation sites.** Some clarification is required of 6.a.iv. Site defendability. We are unclear what this means in practice, as the final clause of the first paragraph apparently contradicts the second paragraph.

- c) Discouraging the establishment of large seeded broadleaves on or near the site
The RSPB would not welcome the large-scale, un-targeted removal of large seeded broadleaved trees from designated native woodlands within red squirrel strongholds, as this could have negative impacts on other biodiversity. We therefore **welcome acknowledgement in these proposals of the biodiversity value of native broadleaved tree species in native pinewoods.**

We support the suggestion that patches of large seeded broadleaved trees 0.5 ha up to a maximum of 5% of the stronghold area should be retained. Our plans at the RSPB Abernethy Forest Nature Reserve include increasing the representation of minority tree species such as birch, rowan, willow, aspen and alder within the existing Caledonian pine forest in the long term, as well as within the expansion zone at the forest edge and beyond.

- d) Squirrelpox concerns
If grey squirrels spread further in Scotland and the squirrelpox virus containment strategy fails, then RSPB Scotland would support intensified humane grey squirrel control where it is part of a recognised strategy to conserve red squirrel populations in strongholds.
- e)

Strongholds in a changing climate

The red squirrel strongholds need to be more robust in the face of climate change. Extending size and altitudinal range of forests would help species dependent of these forests to adapt to climate change, including red squirrels. This should be reflected in the setting and periodic review of site and boundary selection criteria for red squirrel strongholds that protect and enhance other priority biodiversity. Red squirrel stronghold management plans must take account of long-term forest plans, including those for other priority species and designated sites.

Forestry Commission Scotland and Scottish Natural Heritage must develop strategic guidance on the establishment, review, design and management of red squirrel strongholds. RSPB Scotland would wish to input to the development of such guidance.

3. Do you have comments on the suitability of any particular site or sites to act as a stronghold? Please state which site(s).

Yes.

Primarily **RSPB Abernethy Forest Nature Reserve** (within a stronghold), **RSPB Culbin Sands Nature Reserve** (neighbouring a stronghold).

RSPB Scotland has concerns regarding potential conflicts between statutory designated sites and other higher conservation value areas, and the proposed red squirrel strongholds. This must be reflected in the site selection criteria for strongholds.

We agree with the statement in the consultation: ‘... in some woods, for example, native pinewoods, opportunities for species diversification using non-native species may be limited or absent’ (Section 6). We consider a key issue for the establishment of red squirrel strongholds is the interaction with existing statutory designated nature conservation sites. This needs to be addressed in the scoring criteria for site selection, ensuring that the favourable condition of designated sites is enhanced, not reduced. We would therefore welcome **increasing the weighting of ‘conflict with other conservation objectives’ in site selection criteria to prevent potential loss or damage to high biodiversity value designated and undesignated sites.**

The RSPB would have expected more sites east and south of the Cairngorms where there are currently good populations of red squirrels, with greys close by, so worthy of defending, or testing the viability of being able to defend some of these core areas for reds.

As part of the strategy for establishing thresholds the RSPB would expect there to be estimates of red squirrel population sizes for these strongholds to give some indication current habitat suitability and condition. We do not think that there has been sufficient information published in this consultation explaining the rationale behind the strongholds concept and potential implementation at each of the sites.

Management for capercaillie relies on maintaining and enhancing areas of suitable habitat and their connectivity. Strathspey is a key area for this priority bird species, and a vital conservation action is creating linkages between and within the Strathspey and Moray woodlands. **The red squirrel stronghold approach, as proposed, does not fully support these actions for capercaillie, particularly in Strathspey.**

<i>Stronghold name</i>	<i>Stronghold type</i>	<i>Comments on stronghold selection/boundary</i>
Abernethy, Nethy Bridge	Main	<p>This stronghold must ensure that effective and large-scale capercaillie conservation work continues and expands, through forest management and restructuring.</p> <p>Abernethy lies within the wider wooded landscape of Strathspey. Two separate red squirrel strongholds are suggested at Abernethy, and Inshriach/Glen Feshie. These are partially connected by Rothiemurchus and Glenmore. The suggestion that Abernethy should not be connected to other woods would restrict conservation of other woodland species, such as capercaillie)</p>

Culbin	Main	The restoration of coastal dune systems (UK Biodiversity Action Plan priority habitat) must take place, and the stronghold must address issues of tree regeneration on the neighbouring non-afforested designated coastal dune systems
Inshriach and Glenfeshie	Main	Two separate red squirrel strongholds are suggested at Inshriach/Glenfeshie and Abernethy. These are partially connected by Rothiemurchus and Glenmore. The suggestion that Inshriach/Glen Feshie should not be connected to other woods would restrict conservation of other woodland species, such as capercaillie.)
Balmoral to Inver	Main	This stronghold must ensure that effective and large-scale capercaillie conservation work continues and expands, through forest management and restructuring.)
Carsphairn Forest	Reserve	This reserve stronghold, if established, must ensure that effective and large-scale black grouse conservation work occurs, through forest management and restructuring.)
Galloway Forest North	Reserve	This reserve stronghold, if established, must ensure that effective and large-scale black grouse conservation work occurs, through forest management and restructuring.)
Eskdalemuir	Main	Eskdalemuir is included as a stronghold, but is much closer to the current distribution of seropositive greys in south Scotland (but noted that the maps of seropositive greys may be out of date).
Morangie Forest	Main	This stronghold must ensure that effective and large-scale capercaillie conservation work continues and expands, through forest management and restructuring. Two separate red squirrel strongholds are suggested at Morangie and Glen Glass. The suggestion that these forests should not be connected would restrict conservation of other woodland species, such as capercaillie.
Glen Glass	Main	Two separate red squirrel strongholds are suggested at Morangie and Glen Glass. The suggestion that these forests should not be connected would restrict conservation of other woodland species, such as capercaillie.
Black Isle	Main	No comment.
Ordiequish, Whiteash, Ben Aigan	Main	This stronghold must ensure that effective and large-scale capercaillie conservation work continues and expands, through forest management and restructuring.
Daviot Loch Moy	Main	No comment.
Glentochty	Main	No comment.
Leanachan	Main	No comment.
South Rannoch	Main	No comment.
Inverliever	Main	Under-recorded for black grouse. This reserve stronghold, if established, must ensure that effective and large-scale black grouse conservation work occurs, through forest management and restructuring.
Eredine	Main	Under-recorded for black grouse. This reserve stronghold, if established, must ensure that effective and large-scale black grouse conservation work occurs, through forest management and restructuring.
Kilmichael	Main	This reserve stronghold, if established, must ensure that effective and large-scale black grouse conservation work occurs, through forest management and restructuring.
Fleet Basin	Main	No comment
Glenbranter	Main	Under-recorded for black grouse. This reserve stronghold, if established, must ensure that effective and large-scale black grouse conservation work occurs, through forest management and restructuring.

(Threshold names & types from: <http://www.forestry.gov.uk/forestry/inf-d-7q3kk4>; & FCS Potential Red Squirrel Strongholds map: [http://www.forestry.gov.uk/pdf/SquirrelstrongholdsNationalMap.pdf/\\$FILE/SquirrelstrongholdsNationalMap.pdf](http://www.forestry.gov.uk/pdf/SquirrelstrongholdsNationalMap.pdf/$FILE/SquirrelstrongholdsNationalMap.pdf))

4. Do you think that the **boundary** of any particular site or sites should be changed? Please state which site(s), how the boundary should be changed, and why.

Yes – Abernethy/Nethybridge and Culbin. Our reasons why the boundaries for these sites should be changed are:

Abernethy, Nethybridge

- Management for capercaillie relies on maintaining and enhancing areas of suitable habitat and their connectivity. Strathspey is a key area for this priority bird species, and a vital conservation action is creating linkages between and within the Strathspey and Moray woodlands. **The red squirrel stronghold approach, as proposed, does not fully support these actions for capercaillie, particularly in Strathspey.**
- Abernethy lies within the wider wooded landscape of Strathspey. Two separate red squirrel strongholds are suggested at Abernethy, and Inshriach/Glen Feshie. These are partially connected by Rothiemurchus and Glenmore. The suggestion that Abernethy should not be connected to other woods would restrict conservation of other woodland species, such as capercaillie.
- Strongholds appear to be based on current extent and management of forests rather than on a future vision for these areas e.g. linking up Abernethy, Glenmore, Rothiemurchus and Inshriach, through integrated habitat networks. The consultation does suggest that neighbouring stronghold landowners should work together to achieve landscape scale conservation for red squirrels. These four estates and other existing but smaller landowners should form part of a much larger network.

Culbin

The identification of the Culbin Forest stronghold must not preclude or negate open ground habitat restoration, in particular around the coastal dune/shingle designated sites to improve their conservation status.

SNH Site Condition Monitoring work has identified the proximity of the plantation forestry at Culbin Forest and its SSSI, to the adjacent dune and shingle habitats of Culbin Sands as a conservation concern.

Non-native conifers can self-seed onto the dune and shingle areas, which are designated SSSI, SPA, SAC and Ramsar. The forestry is also planted on what was fixed dune grassland habitat, and the current unfavourable condition status of the adjoining SSSI is also due to the lack of natural transition from mobile dune communities through to dune grasslands.

Non-site specific boundary issues

The management of a very high proportion of woodland species, including capercaillie and black grouse, relies on maintaining and enhancing extensive areas of suitable habitat and maintaining and enhancing their inter-connection. The establishment of red squirrel strongholds must not conflict with this. This issue must be addressed strategically with **clear national and regional policy and guidance for red squirrel stronghold establishment, design and management to RPACs, FCS, SNH as well as forest owners and managers.**

5. Do you think that the **proposed support for management** will be sufficient to achieve stronghold objectives? If not, what support is needed?

Forestry Commission Scotland and Scottish Natural Heritage should continue to promote and approve state and private long term forest plans for the management of all key habitats and species within the strongholds, taking account of the statutory designations and their requirements, as well as management for red squirrels. The size and boundary of the strongholds must take account of the vision set out in existing long term forest plans for designated nature conservation sites, which includes forest expansion and management, and relevant support given to this end.

Abernethy, in common with several other proposed stronghold sites, has significant and important conservation designations, which could conflict with the optimal requirements set out for the red squirrel strongholds, e.g. diversifying site with non-native conifers. It is imperative that, for each proposed stronghold - and surrounding forest areas – agreement is reached regarding which prescriptions can be implemented for red squirrels without compromising forest ecosystems or the other key species and habitats.

Maintenance management within these stronghold areas may be required, in particular grey squirrel control. Assurances are required to ensure that ongoing management commitments can be met through suitable support and funding.

In Section 6c landowners and managers within strongholds are being asked to sign up to the principles set out in the proposals for red squirrel strongholds. **This must be part of approved state and private long-term forest plans both for both undesignated and designated nature conservation sites, sanctioned by Forestry Commission Scotland and Scottish Natural Heritage.**

The final date for receipt of responses is Friday 26 June 2009.