

## **Community Woodlands Association**

### **Response to Highland Forest and Woodland Strategy 2004 (IFS 2)**

The Community Woodlands Association welcomes the opportunity to comment on the Highland Forest and Woodland Strategy.

Overall, we believe the draft strategy represents a significant improvement on both IFS 1, and the “Issues paper” released in 2002. In particular, we welcome:

- the incorporation of major policy developments over the last decade, e.g. Scottish Forestry Strategy, and in particular the recognition of the importance of multiple benefit forestry, and the growth of community forestry.
- the methodological improvements, such as the use of ESC, which have produced a draft policy map which is “much closer to the ground” than its predecessor
- the achievement of a better balance between constraints and opportunities. It is however vital that this balance is reflected in the employment of the final strategy, e.g. when evaluating SFGS applications and forest design plans.

We have a number of comments and recommendations regarding the overall structure and content of the draft strategy:

#### ***Limitations of a Highland-wide IFS***

We would like to see a recognition of the limitations of a Highland-wide IFS – whilst the strategy can and should give an over-arching regional context, however well thought-out the final document, it cannot be expected to give sufficient resolution to fully capture local detail, distinctiveness and requirements (this is in part recognised in section 4: Area Policy Classification).

We believe that greater resolution can be achieved through community-led sub-regional planning. We would also argue that such locally-led planning leading to the identification of specific priorities and objectives is more likely to attract Locational Premia.

**We recommend** that the strategy acknowledges the limitations of resolution inevitable in a Highland-wide view, and supports the development of community-led local forest planning.

#### ***Presentation and Definition***

Whilst we recognise that the format and terminology of the Strategy are somewhat constrained by the guidelines laid down in Circular 9/99, there are a number of issues of presentation and definition which require attention:

- We note that the Scottish Forestry Strategy refers to “strategic directions”, rather than “key aims”.
- The draft strategy refers to key principles, key themes, strategic themes, thematic strands, key forestry policy themes, and sub themes. Greater clarity and consistency, or at least a schematic, are required to demonstrate their interrelationship.
- The draft uses “commercial”, “productive” and even “mainstream” as interchangeable, synonymous with “timber-producing” and as distinct to other types of forestry. None of these terms is particularly helpful; many “commercial” forests are not, and whilst it is useful to distinguish the primary objective of forest management in a particular location, national policy recognises that the establishment and management of all forests should aspire to “production” of multiple public benefits.
- “Farm forestry” is poorly defined – and it is unclear whether what differentiates this category is simply motivation, e.g. agricultural diversification, or whether there are specific forest design implications, e.g. scale, species choice, etc.

**We recommend** that the adopted strategy have greater clarity and consistency, both structurally, and in its terminology.

### **Representation**

The Scottish Forestry Strategy and the Scottish and Regional Forestry Forums acknowledge the equal part that environment, social and economic sectors have to play in forestry. We note that the “Technical Group” (Appendix 4) has 2 non-governmental representatives, both from the economic sector and none from either social or environmental sectors. This lack of representation is reflected throughout the document.

**We recommend** that membership of any group advising on The Highland Council’s approach to forestry should have equal representation from the three sectors.

We also have a number of comments and recommendations regarding the key principles and themes of the draft strategy

We note that the draft strategy states (p5) “There is also a need, now that a national forestry strategy is established, to link the Highland IFS more explicitly to its objectives”. We agree, and a number of our comments and recommendations relate to ways in which this link could be more explicitly made.

### ***Identify opportunities for forest and woodland expansion compatible with other interests recognising the importance of helping to improve the continuity of timber supply. (Key principle 1)***

The Scottish Forestry Strategy is clear that woodland expansion should contribute towards the creation of high-quality woodlands serving a variety of purposes, of which timber production is just one. We note that other objectives are recognised in the bullet points, but feel it is unhelpful to prioritise one particular objective in this way. We further note that the bullet-point list of woodland opportunities might be taken to suggest these objectives are in some way mutually exclusive, rather than stressing, as per SFS, the importance of integration and multiple benefits.

**We recommend** that this key principle be rephrased in terms closer to the SFS, e.g.: “Identify opportunities for creating new, high-quality, woods and forests serving a variety of purposes.”

**We recommend** that a new bullet point be added thus:

- ensuring that all new woodlands, whatever their primary objective, are created and managed to deliver integrated multiple benefits.

### ***Improve existing forests/woodlands to enhance forestry’s contribution to the economy and environment of Highland (Key principle 2)***

Forestry’s contribution to the economy and environment of Highland has been constrained by the widespread use of a plant/no-thin/clearfell regime, which has the unfortunate effect of minimising both the economic and non-economic value of a forest; limiting the quality and value of the timber harvest, minimising employment opportunities during the rotation, reducing the amenity and biodiversity value of the growing stand, and causing significant, if temporary, landscape dis-benefits at clearfell.

The Scottish Forestry Grants Scheme features considerably enhanced (cf. the WGS) support for woodland management under a range of stewardship objectives, and there is growing acceptance of the multiple benefits of adopting alternatives to clearfell. Whilst we acknowledge that soil and exposure conditions place limits on adoption of more complex silvicultural systems in some areas, there are undoubtedly many suitable locations within Highland, in particular, many of the more sheltered, fertile areas where timber production is to be concentrated, and we consider the absence of any mention of silviculture and forest management in this section to be a major omission.

**We recommend** that the encouragement of more varied silvicultural systems, including alternatives to clearfell, be made a key element of this principle.

### ***Community Forestry and Community Benefits (Key principle 3)***

We welcome a number of positive features within the draft strategy, notably the recognition that community benefits from forestry go beyond the provision of recreation, and the acknowledgement of the significant local benefits secured by existing community forest initiatives.

However, we feel the strategy should incorporate both a wider vision of potential community benefits from involvement in forestry, including addressing social inclusion and healthy living agendas, and a stronger endorsement of the development of community-led woodland initiatives.

**We recommend** that bullet point 4 be replaced with a new point:

- encouraging the development of community-led woodland initiatives, and supporting community ownership where this will bring local benefits.

We note that there are a considerable number of community forests and woodlands in Highland which are not included in Figure 1.

#### ***Transport/Infrastructure Issues (Key principle 4)***

We believe that this key principle, derived from the SFS “maximising value” strategic direction, is overly focussed on timber transport issues, with too little attention to alternative strategies for maximising value. This discrepancy in approach is highlighted by bullet points 4 & 5 – The Highland Council should be “pressing” for additional government funding to support the development of new small-scale processing to meet local needs”, rather than just “supporting opportunities”.

The reality is that transporting high volumes of low grade material over large distances is never likely to prove economically appetising, and that improving the road infrastructure will not be more than a quick fix. The (admittedly longer-term) alternatives are to improve the quality (and thus the value per tonne) of the material hauled, which requires better selection of planting sites & more intensive silviculture (as per key principle 2), and to develop local processing and markets (including woodfuel), especially those which utilise products from thinning.

**We recommend** that the scope of this key principle be widened, e.g. “maximise the value to the Highland economy of the wood resource”, and that the bullet points be revised to prioritise the development of local processing and markets.

#### ***Funding for Forestry in Highland (Key principle 5)***

We agree that it is important for the region to sustain a healthy level of activity and uptake of SFGS opportunities (and other funding sources where available). It is therefore essential that the IFS, once approved, is employed positively, rather than as a constraint, when the Highland Council is advising on specific proposals.

We suggest that “riparian woodland” be added to the bullet point list of “specific types of woodland” which might attract enhanced levels of funding.

As indicated previously, we believe that community-led, sub-regional forest strategies, identifying specific local priorities will enhance the prospects of attracting Locational Premia.

#### ***Sustainability (Key principle 6)***

We believe that this principle requires rethinking. Presenting “sustainability” as a separate principle invites its consideration as “optional extra”, rather than as hard-wired into all five preceding principles. If there is a role for an additional principle relating specifically to sustainability, then it is in restating the key sustainability issues and responses and identifying the various scales at which forests and woodlands have a role to play.

Relevant sustainability issues include: maintenance of soil quality, nutrient status, water quality, biodiversity, deer management, community development, local and regional employment and global climate change – some clearly demand a local, forest-based response, other necessitate strategic regional, national and even international action. The challenge for policy-makers is to find a way forward which addresses all the issues.

With regard to the particular points made in this section, bullet point 2 “encourage appropriate management of existing forests and woodlands” is so vague as to be almost meaningless, whilst we find it curious that bullet point 6 highlights those rare areas of Highland where deer numbers are low. Bullet points 3,4 & 5 should be key elements of principles 1 & 2.

### **3 Key Themes and Priorities for Implementation &**

#### **4 Area Policy Classification**

In addition to those points raised previously (e.g. there seems to be little consideration of forest management or local processing in these sections), we would note two points:

We understand the role of Regional Forestry Forums to include “promoting the principle of local forestry frameworks, indicative forest strategies, and other woodland strategies, their development and implementation” (from FCS guidance on the role of RFFs). “Promotion by Highland Forestry Forum” should therefore be assumed in the “Relevant agencies, actions” column for ALL topics and strategic themes listed, rather than just the first three “productive timber” items.

The relevant agencies listed for “community woodland around settlements” are FCS, THC and SNH. Whilst these are indeed the main statutory bodies, the appellation “community woodland” here presupposes a lead role for the local community.

Additionally, we note that the identification in **Figure 2** of certain areas as having significant potential for productive forestry (e.g. Morvern, Ardnamurchan) seems at odds with the stated objective of concentrating timber production in areas with good transport infrastructure.

#### **5 Monitoring and Review**

We welcome the recognition that the IFS must be a “living” document, with the flexibility to incorporate evolving executive policy and priorities and e.g. Forest Habitat Network Strategies. However, in the absence of a control group without an IFS, it is unclear how any of the proposed “key indicators” will reflect the effectiveness or otherwise of the regional strategy. Indeed, some proposed indicators: e.g. “visitor numbers in woodland areas”, “implementation of approved SFGS applications” appear to be completely irrelevant.

**We recommend** that the effectiveness or otherwise of the regional strategy be monitored by ongoing assessment of feedback from all stakeholders: agencies, private sector owners & managers, the harvesting and processing industries, community councils, community woodland groups, and the general public.

Additionally, **we recommend** that any technical group assembled to carry out a review of the Strategy include representation from the social and environmental sectors.

We trust that these comments and recommendations are helpful to you, and look forward to the adoption of a Highland Forest and Woodland Strategy which promotes the further development of well-managed woodland as a renewable and multi-benefit resource, offering a mix of economic, recreational, landscape, nature conservation and community benefits.