

CWA Response to the FLS Draft Communities Strategy Consultation August 2022

Communities Strategy for Scotland's National Forest and Land - Draft for Consultation
Thank you for taking the time to review the draft Communities Strategy (available here: <https://forestryandland.gov.scot/what-we-do/communities>). Your responses will help us shape both the Strategy and help inform a detailed action plan. The survey will run until the 23 August 2023.

1.Name

CWA

2.Your consultation response will be published online. Please tick the box if you are content for your name to be published with your response?



I am content for my name to be published with my response

3.Organisation (if applicable)

CWA

4.Please leave a contact email if you would like to be kept in touch as we develop the Strategy and action plan

5.Do you support the Purpose of the Communities Strategy (page 4):

To fully realise the contribution of Scotland's National Forests and Land to building vibrant, sustainable, wealthier and resilient communities, recognising the rights and responsibilities of all to work together to sustainably manage our forests and land.

Please use question 6 to comment further.



Yes



No



Maybe

6.Additional Comments.

CWA welcomes this Purpose, and have a firm belief that this Strategy can provide a necessary framework to ensure that FLS makes a step change in the way in which it interacts with communities. We are of course aware of the good work that FLS does across the NFE already. However, we consider that these good works are carried out in a manner and at a volume that does not match the approach and achievements of FLS's predecessor organisation.

To a considerable degree these past achievements can be attributed to leadership, but also to the organisation's willingness to engage and listen to advice from a range of stakeholders at local, regional and national level. We urge FLS to ensure that these building blocks of success are in place to ensure that the strategy is successfully delivered.

We note that the second half of the purpose is less than clear. “All”, the public, have neither a right nor a responsibility to work together to manage the National Forest Estate. The “our” in “our forests and land” is also ambiguous: who is “our”? the people of Scotland, the Scottish Ministers, or FLS?

7. Do you support the aim and priorities for what FLS will do set out in Principle 1 – Supporting the transition to a fairer, greener Scotland (Page 9)?

Please use question 8 to add any additional comments.

- Yes
- No
- Maybe

8. Additional Comments

The aim should focus more on just transition rather than Covid recovery.

As always, much will depend on the way in which wording in the priorities are actually implemented “Facilitate”, “Make best use of”, “strengthen relationships” and “prioritise community led” are all phrases that can result in meaningful change, and the priority must be for FLS to make sure that they do.

The Strategy should recognise that FLS has a role in addressing the inequalities that arise from socio-economic disadvantage, and that this is a role which requires FLS to take a lead in encouraging and supporting groups to develop projects.

9. Do you support the aim and priorities for what FLS will do set out in Principle 2 – Supporting sustainable and thriving rural communities (Page 9)?

Please use question 10 to add any additional comments

- Yes
- No
- Maybe

10. Additional Comments

FLS deserves recognition for resourcing a dedicated team to manage CATS, an approach which puts FLS at the forefront of implementing the ACT. Despite this Asset Transfer remains a complex process that places considerable demands on community volunteers. The low level of recent applications is perhaps a reflection of this complexity.

FLS should consider a broader principle about community wealth building in rural Scotland, a commitment to support community investment in income generating enterprises on the National Estate.

Innovative ways of working can open up interesting opportunities including for example communities and FLS to enter into Joint Ventures to own and manage new and existing plantations.

Increasing collaboration is an important priority, and one which should be grasped to ensure that FLS is once again at the forefront of supporting rural communities. This will require leadership, an increase in resources, and the provision of training for staff.

We look forward to working with FLS to make the most of such opportunities.

11. Do you support the aim and priorities set out in Principle 3 – Informing and Engaging Communities in decision making (Page 10)?

Please use question 12 to add any additional comments.

- Yes
- No
- Maybe

12. Additional comments.

13. Do you agree or disagree with what success would look like (Page 11)?

Please use question 14 to add any additional comments

- Agree
- Disagree
- Neither agree or disagree

14. Additional comments:

We believe that FLS, as a publicly owned body, should be an exemplar of good practice and go beyond simple statutory compliance - particularly in terms of community engagement as it is reflected in sustainable forestry management. One clear example of "beyond compliance" would be the extent to which it embraces the Scottish Land Rights and Responsibilities Statement and the way "Public Good" is committed to and delivered.

Further we suggest that the end of the first sentence should prioritise climate action and regeneration thus: "for transition to net zero, regeneration and development".

15. Do you have any other comments, concerns or additions you would like to make about the strategy?

Two general comments:

1. We welcome the opportunity to comment on this strategy, and will look forward to input into the Action Plan that will follow. Our comments at this stage are aimed at helping FLS to get the principles and wording in the strategy into a place where a stronger Action Plan will follow.
2. While FLS has undoubtedly been a leader amongst Scottish Government bodies in its approach to community engagement, the document would be strengthened if it also:
 - a. analysed how FLS has (or has not) tried to 'include' (? 'engage'?) communities and has had only minor success or has failed;
 - b. analysed examples where past achievements delivered by good partnership working have not been built upon, or have been allowed to diminish;
 - c. reviewed the way in which previous external recommendations have been or have not been implemented. The most recent example we are aware of is the 'Health Check' Working Group Report from August 2014.

We also note:

- 1 Page 5: *Outcome 1 “Supporting a Sustainable Rural Economy” FLS supports a sustainable rural economy by managing the national forests and land in a way that encourages sustainable business growth, development opportunities, jobs and investments”*
This is not necessarily an outcome that works for communities adjacent to plantations if the investments, development opportunities and business growth are largely focused in other parts of Scotland. This tension needs to be addressed.
For example, there are barriers to entry to working on the NFE for micro rural businesses. These types of business often have a considerable impact on the future economic and social well being of small rural communities. Supporting these types of rural enterprises to access work on the NFE should be an important part of this principle.
- 2 Page 5, final para: *“The Communities Strategy focusses on how communities themselves can get more involved in the decisions, management and use of the national forest and land to help deliver their objectives”*. We suggest that the focus here should be more on what FLS can help communities to become more involved: *“Strategy focusses on **how FLS can help and support communities to become more involved in the decisions...**”*. Delivery is otherwise too heavily reliant on the considerable voluntary effort required to make things happen. FLS should state their intention to work more proactively with communities to ensure that engagement becomes more meaningful. Some of the text in principle 2 (page 9) goes some way to support this different approach.
- 3 Page 6 *“Consultations must be as accessible as possible”* is an important principle, however the discussion is thereafter limited to matters relating to physical accessibility, and ignores both
 - a. the requirement to make the material that is consulted on as accessible as possible for a non technical audience.
 - b. the desirability of a more proactive approach to engagement, including both better publicity and the staff training that this will require.
- 4 Page 7 Community Renewables
While we welcomed FLS’s work on both establishing a threshold for community benefits payments in 2011, and subsequent asks around local employment, we would welcome an indication of the actual sum that has, as a result, flowed into community coffers.
We also note that 7 communities have developed their own hydro projects on NFL, and while this is welcome, it would be good to see more commitment to dramatically increasing the percentage of renewables that are either completely or significantly community controlled. We believe that a comparison between the community benefits (monetary and non monetary) deriving from ownership as opposed to a benefit fund would illustrate the reason for this request.
- 5 Page 8 CATS
We note that recent examples are almost entirely for small areas of ground, while the box highlights the *“transformational change for communities”* afforded by earlier larger asset transfers. Will this strategy help to ensure that in future more larger scale asset transfers allow other communities to benefit from transformational change?