



[DRAFT] MORAY WOODLAND & FORESTRY STRATEGY, MAY 2017 Comments from FINDERNE Community Council

1 Introduction & Background

FINDERNE Community Council (FCC) welcomes the opportunity to comment on The Moray Council's draft Woodland & Forestry Strategy.

FCC represents the rural communities of Rafford, Easter Lawrenceton, Dunphail, Edinkille, Logie, Cathay, Altyre, Burgie, Blairs, Blervie, Brodieshill, Relugas, GLENERNEY and BraemoraY and has a constituency of some 1,900 residents. A significant proportion of its land area comprises woodland cover of varying type and scale but dominated principally by large blocks of commercial National Forest Estate and privately owned commercial plantations. The status and contributions that this woodland cover make within the FCC area are thus of key importance to both our local communities and visitors, along with issues and challenges faced by those whose livelihoods and quality of life are directly or indirectly affected by the health and sustainability of the forest industry.

FCC therefore commends The Moray Council in preparing this positive document which provides an important opportunity to promote, protect and enable the future sustainable development of the tree, woodland and forest resource which together represent a fundamentally important element of Moray's economic and natural "capital".

We would emphasise that our comments as set out below are made within this positive context and also acceptance that the document is still at draft stage. After some general and typographical comments we have aligned our commentary with the main headings of the draft document for your ease of reference.

2 General / Typographical

The document has merit in its brevity and thereby "readability" together with visual interest provided by its illustrations and diagrams.

We would recommend inclusion of a "Contents" page as this not only helps to quickly signpost readers to specific aspects of the document but also helps with understanding the Strategy's overall structure.

There are a number of typographical errors. Whilst these will doubtless have been "ironed out" at final proof reading stage to underpin the document's consistency and credibility, may we meantime draw your attention to the following:

- **Capitalisation** (notably on page 5): the convention when naming tree species is to use an initial capital only for a proper noun / name. Thus, Douglas Fir should read Douglas fir; Norway Spruce should read Norway spruce and thereafter on the same basis ...Lawson cypress, western red cedar, western hemlock, Siberian spruce and European silver (not sliver!) fir.
- Moray Nurseries should also read Moray nurseries.
- On Page 8, 'felling license' should read felling **licence**; "landowner's" should read "**landowners**".
- We think your reference to "Siberian Spruce" should read **Serbian** spruce which is a more likely species choice for UK (incl Moray) conditions. For the same reason we would also recommend you replace European silver fir with **grand fir** and **noble fir**.
- On page 7 (under Education, Training and Skills) the first sentence as currently drafted implies that the workforce is not only getting older but also shrinking in stature! Perhaps "**the current workforce is ageing and not attracting sufficient levels of new entrants**" would read better?
- We would recommend replacing "ambassador's network" with '**network of industry ambassadors**'.

3 Introduction & additional baseline Information

Whilst we welcome the reference to the importance of forestry to Moray, we do nonetheless feel that the very short introduction significantly undersells its significance as one of Moray's key land uses.

The key facts stated about the area of forestry cover are rather bald - and **62,441** hectares does sounds very specific rather than just an "approximation"?!

We consider that Moray's long standing tradition and proud history of woodland stewardship and management, supported and encouraged by its particularly favourable climatic conditions for growing a wide variety of productive and other woodland, together with its contribution to the local economy, give Moray a correspondingly unique place within Scottish forestry generally.

We also bear witness to the fact that Moray's resource of trees (which include some of the oldest to be found in the UK) and woodlands continues to provide a high quality, jealously guarded and distinctive aspect of the county's environmental, landscape, economic and social fabric.

A number of exemplars of traditional privately owned estate woodlands are found in Moray - including *inter alia* Altyre, Logie and the Moray Estates - as well as those of the National Forest Estate well known for their historically famous pioneering work in establishing highly productive, and now multi-purpose, forests along the Moray coast as a means of protecting adjoining highly valuable agricultural land from invasive sand dunes.

Furthermore, our constituents are becoming ever more aware of increasing levels of timber movements around the county (and rural road network) and perhaps don't fully appreciate that this is as a result of the sheer scale of the woodland resource in Moray coupled with its "age and stage" (in terms of crop maturity and timber production), and which in turn is generating important economic activity.

In light of the above, we would therefore recommend that the Strategy places more emphasis on the distinctiveness of Moray's forest and woodland resource. By doing so this would strengthen the "scene setting" for the Strategy from the outset?

We feel that the document would benefit from an additional **section heading** that provides additional baseline information / contextual detail about the woodland resource itself - e.g. under the sub headings of ownership (NFE v private sector), main woodland types / principal species / age class and also productivity. The latter would provide the context for the role and trends for future timber production and it would be helpful here to illustrate (e.g. graphically) projections of timber availability over say the next 20 years. Such information should be openly available via Forestry Commission Scotland's production forecasts.

The above baseline information would serve not only to improve the readership's understanding of Moray's forest resource but also the role and scale of timber production as the underlying driver for the regional forest industry's contribution to the local economy.

We suggest that current and future levels of timber production could then be usefully included alongside the document's other "headline" facts and figures as appearing on the inside first page.

4 Purpose of the Strategy

We are not really clear as to the proposed audience for the Strategy and we feel it would help if this section articulated this? We would hope that the Strategy would have an important promotional role in informing elected representatives and the wider public as to the importance of forests, woodlands and its related industries in Moray and to help engage them in the vision for their future expansion and development.

5 Policy Framework

We would recommend a specific heading for "**National and Local Policy Framework**" (after "Introduction" and "Purpose of the Strategy").

Whilst the simplicity of the policy framework graphic is commendable and reduces the need for unnecessary explanatory text, we nonetheless feel that it would be helpful to include an introductory sentence to explain to a potentially wide audience of readers that there is a wide and interconnected

.../interconnected

legislative, regulatory and policy framework that has a bearing on forests and woodlands at national and regional levels, and that (within the lifetime of the this Strategy) the Scottish Government will have put in place new primary legislation to fully devolve forestry in Scotland.

For consistency we suggest that each of the policy contexts are attributed their publishing date rather than some with and some without.

We also recommend that the graphic “chain” be expanded to include a number of other significant policy and regulatory contexts because they have a bearing on, and/or or will influence or support, the range of opportunities identified within the Strategy:

- **UK Forestry Standard (2011)** [cf. because it sets out the national tenet for sustainable forest management]
- **Scottish Government Policy on Control of Woodland Removal (2009)** [relevant to interaction between development and trees / woodlands]
- **Scottish Government Rationale for Woodland Expansion (2009)** [relevant to woodland expansion opportunities]
- **Scottish Government Community Empowerment Act (2015)** [relevant to community connections with woodlands]

6 Vision

We support the positive tone of the vision. However, the reference to production of high quality timber - whilst clearly being very important - is on its own rather narrow, there being opportunities for other aspects of wood processing and forest products to also contribute to the local economy and support jobs etc..

Could we suggest the vision might thus be adjusted to read:

“Moray has a high quality and sustainably managed network of forests and woodland whose potential has been harnessed to contribute to the local economy, protect and enhance its environment, attract visitors, provide educational and recreational opportunities and contribute to the health and well being of our communities.”

For consistency, in the sentence following the vision statement, we recommend the word “aims” should be replaced by **“themes”** which are thereafter developed in the following sections.

7 Key Themes

We support the three key themes as introduced on Page 3.

May we suggest, however, that in order to strengthen the ambition of the document in terms of the economic contribution that the forest and woodlands resource makes to Moray, that the economic theme reflects this by expanding it to read: “Harnessing **the economic** potential of our woodlands”.

Also, to support the references made elsewhere in the Strategy to new woodland planting, we feel that the environmental theme should read: **“Expanding**, protecting and enhancing our woodlands”.

We would also suggest that **“Tree Health”** replaces “Tree Disease” (also on Page 13) as the former covers a wider range of challenges / opportunities, not just the negative connotations of pests and diseases *per se*, but also resilience to climate change through species diversification, stricter control on imported tree reproductive material etc..

We also have a few comments on the text beneath the various themes as follows:

Economic Development - we feel the strategy would benefit from a stronger section here that speaks more about the opportunities for development of the wood processing industry in Moray not just within an employment context. These would include biomass (wood fuel), with the new plant at Craigellachie being a prime example, as a means of providing local outlets for small roundwood, to supplement markets for higher quality construction and other timber products that are found at the sawmills such as James Jones. Perhaps photograph(s) specifically of these processing centres would be beneficial here to raise reader awareness?

Woodland Planting - we feel the key challenge / opportunity here is that further woodland expansion is vital not only to help contribute to the Scottish Government target of a further 100,000ha of woodland creation by 2022, but also to help address the issue of net loss of productive woodland of over 24,000 hectares in Scotland over the past 2 decades. The latter has arisen via a number of causes, including the need to diversify second rotation forests through restructuring design, removal of forests from high quality peatlands and wholesale or partial loss of woodland to wind farm developments. Despite its heavily wooded landscape as described above, any net loss of productive woodland and associated economic and environmental impacts would be as unwelcome in Moray as anywhere else in Scotland. It also poses a threat to continued inward investment and sustainable development (and employment) in the forestry sector.

Thus we would suggest that second bullet point might more appropriately read: **“Promote the planting of a wide range of productive species to help support sustainability and expansion of the forest industry in Moray”**.

Timber Transport - this is a subject particularly close to the hearts of local communities who are faced with increasing movements of timber via the often narrow rural road network impacting on noise, vibration levels and public safety issues, as the forests and woodlands in Moray accelerate to maturity.

We therefore welcome this dedicated section within the Strategy on timber transport. Our Moray communities are generally accepting of the fact that timber transport is an essential aspect of a maintaining vibrant forest industry and that timber has to be transported from forest to market. However, the timber haulage industry should not take such community support for granted.

We would urge therefore, that this section recognizes the need for local communities to be kept in the “collaboration” chain - via Community Councils - particularly at the stage when the Local Authority and / or the Grampian Timber Transport Group are involved in discussions on timber transport arrangements as part of the consultation process with landowners with regard to approval of forest plans and/or other felling licence proposals.

Thus, the second bullet point would benefit from additional wording at the end **“ ... based on Agreed Route Maps and in consultation with the local authority and local community councils as appropriate”**.

We would also recommend reference in this section to the relevant industry codes of practice for timber transport – namely the Timber Transport Forum’s **Road Haulage of Round Timber** (2012).

Tourism, Recreation and Access – at the top of Page 8 (second sentence), we assume the reference to local “visitors” really refers to local **people** as distinct from tourists?

We feel that the final sentence (before the photo of Hill 99 viewing platform) would benefit from re-wording as it would normally be the case that many (but not all!) private landowners maintain their woodlands to a high standard for silvicultural and general stewardship reasons, and that recreation and tourism opportunities are enhanced as a result.

Could the sentence read: **“It is recognized that many private landowners in Moray have supported recreation and tourism opportunities by maintaining their forest and woodlands to a high standard and by welcoming public access”**.

Should we also mention the very significant role that the National Forest Estate has played in promoting public access and the “visitor experience” - as implied by the [Hill 99] photograph?

Thus also add ... **“and the National Forest Estate”** to the end of the final sentence in this section (i.e prior to sub-heading “Accessibility”)?

Walking (page 10)

Whilst we welcome the various bullet-pointed opportunities, we’re unclear as to how these link or interact specifically with Moray’s forests and woodlands *per se* and what needs to be done to promote better interconnection and collaboration with woodland owners to make sure that these opportunities can be brought to fruition?

We’re not clear what the final sentence on Page 10 means viz. the word “offer”? We suggest you might want to link this sentence specifically to the relevant Map (and title) within the Strategy document.

Health and Wellbeing (page 13)

Again we welcome these very positive objectives. Perhaps the third bullet point could be further strengthened by saying: **“Promote the management and creation of, and accessibility to, woodlands close to towns and villages”**.

May we also suggest that the fourth bullet point be strengthened by adding **“sustainable management of existing woodlands”** after ... to secure woodland creation? - the rationale for this being to ensure that wherever possible development does not contribute to net loss of woodland (*viz a viz* the SG’s Policy on Control of Woodland Removal).

Environmental Quality of Woodlands (page 14).

We suggest that in the first bullet point it is important to add ... **“and restructuring proposals...”** that **“help mitigate effects of climate change on future tree health by encouraging...”** etc..

Under **“Environmental Quality and Biodiversity”** (second bullet point) we suggest adding at the end of the sentence: **“such as Low Impact Silvicultural Systems (LISS)”**.

Third bullet point - add: ... **“that contribute to LBAP objectives”**.

Fourth bullet point - we feel that **“encouraging sustainable forest management that meets the UK Forestry Standard”**, whilst absolutely true, should be referenced much earlier in the document as being an underpinning paradigm of the Strategy, rather than suddenly appearing here?

Opportunities for New Woodland Creation(page 15).

We note that the indicative mapping for **“Opportunities for New Woodland Planting”** has included the additional category of **“Survey Work Required”** to those normally recommended within the SG’s **“Right Tree in the Right Place”**. May we suggest that some additional explanatory text be included for readers to better understand the status and rationale for this categorisation?

When referring to the **“methodology supporting opportunities for new planting mapping is set out in Appendix 1”** (bottom of Page 15), for clarification, does the table on the next page = Appendix 1? The table would benefit from a title?

8 Concluding remarks

To reiterate, FCC welcomes the opportunity to contribute to the development of this important Strategy and trusts that our comments will be taken in the positive spirit intended.

FCC looks forward to playing its part, along with other community councils and relevant stakeholders, in working more closely with the TMC to help promote and achieve the vision for the future vibrancy and multiple benefits of Moray’s woodland resource as will be set out in the finally published Strategy.
