Consultation: Cairngorms National Park Forest Strategy

23 March 2018

Do you think this vision sufficiently captures the opportunities for forestry over the next 20 to 100 years?

no

If not how could it be improved?

We warmly welcome the vision of a substantially expanded forest resource including large areas managed for timber and supporting a wide range of jobs in woodland management and processing.

However, the detail about species make-up, siting and management of these forests requires further thought and development.

The vision seeks to have a 'higher proportion' of native species, to be 'more structurally diverse rendering them more resilient to risks from disease and invasive species' with 'a wide variety of local, sustainably-sourced native timbers'. However, the figures on p.8 show that 76% of the existing forest cover is already Scots pine (60%) and birch (16%), with 21% non-native conifers and 3% other broadleaves.

As Scots pine is the only native conifer, a 'higher proportion' would mean approaching a monoculture, at risk from disease and of violating the UK Forestry Standard which specifies that a maximum of 75% should be allocated to a single species, with at least 10% another commercial species. There are opportunities to diversify in suitable parts of the Cairngorms into species such as Douglas fir. At present, the business case for woodland creation in some places may only be made through planting non-native conifers: it is important that a presumption in favour native species does not result in landowners deciding against planting woodland at all, or creating poor-quality unmanaged woodland.

In softwoods, the ambition is even less clear, with a hope that in 100 years time birch might be used for 'firewood businesses and for bespoke woodland crafts'. 'Passivhaus'-style energy-efficient timber homes are already being built in the Cairngorms, and we would hope that within 100 years there will be little need to *burn* wood for heating. Already, birch can be used for a wide variety of manufactured timber products for furniture and building materials. It can also be a feedstock for the high-tech bio industry, manufacturing anything from solar panels to fabric to biodiesel. We would like to see an ambition that within 20 years, the existing birch resource would be brought into management to support a sawmill, with extensive new areas planted to support high-tech processing facilities in the longer term. Other commercial species should be included in the vision. The creation of 'large stands of pure aspen' mentioned as a desirable habitat could be incentivised as an additional feedstock for such industries. The absence of grey squirrels gives the region a great advantage over other parts of

the UK for commercial broadleaves, and the potential for these in the glens should be explored, particularly with the forecast of a warming climate.

Do you agree with each strategic objective?

1. Promote the creation of new woodlands that complement other land use - yes

2. Enhance the condition of existing forests - yes

3. Restore lost or vulnerable forest ecosystems - yes

4. Encourage natural regeneration of native forests - no

5. Promote the creation and enhancement of productive forests - yes

6. Protect forests from disease and invasive species - yes

7. Increase employment in the forestry sector - yes

8. Encourage innovation in the use and making of native forest products - yes

9. Promote responsible access and active enjoyment of forests - yes

10. Promote community involvement in forest management - yes

If not, please let us know how it/they could be improved. Please clearly note which objective your comment relates to:

4. Revise to 'Expand woodland through natural regeneration or planting as appropriate'. While there are impressive examples of natural regeneration in the Cairngorms, these are often combined successfully with planted areas, which deliver timber, carbon, biodiversity and other benefits in a far shorter space of time. The consultation recognises the importance of forest management: active tree-planting should be regarded as an important forest management practice in its own right, and not as a second-rate option to natural regeneration. Tree-planting work is also the first way in which the area can deliver jobs in forestry and develop a forest culture.

5. While the objective is good, the explanation underneath it presents an unfair caricature of 'good v bad' commercial forests, which does not recognise the developments in forest management over the past century, or the importance of plantation-style forests in supplying the lion's share of the timber crop. In developing a strategy to deliver this objective, the first step will be to examine data on how much timber is supplied by which forests, to ensure any transition to a different forest composition does not jeopardise the region's sawmill businesses. A formal consultation with sawmills and other wood users who source wood from the park, to identify what are the key timber requirements now and in future would be valuable.

8. While the objective is good, the text underneath should make it clear that 'native forests products' is not merely a 'craft' sector, but that by engaging in

new timber technologies, from housing to biotechnology, the Cairngorm forests can make a major contribution to the future resource needs of Scotland, to the Scottish economy, and to the creation of highly-skilled professional jobs.

Policy Guidance

Do you agree with the policy guidance on integrating woodland creation with other land use?

No

If not, how could it be improved?

Planting on appropriate agricultural land should be supported. Conifers including Sitka (which provides by far the best and fastest financial return per hectare), and potentially broadleaves such as Oak and Beech, should be regarded as a farm crop likely to deliver high economic returns, thus helping to support the culture of crofting and farming into an uncertain economic future. They are also able to deliver important environmental benefits for biodiversity, flood management, landscape enhancement etc.

Do you agree with the policy guidance on habitat enhancement?

no

If not, how could it be improved?

As it stands, the action 'dense conifer stands in close proximity to watercourses should be gradually replaced by native broadleaved species' simply repeats the existing requirement of UKFS, and where forest is actively managed this will usually have been done already. It would be more helpful for the action to recognise that the remaining instances are usually where extracting the trees would either be expensive or difficult to do without causing pollution or damage. A better action might be 'assess the damage being caused by unmanaged conifer stands near watercourses, and target suitable assistance to landowners to bring the most problematic areas back into management'.

Aspen: the best way to incentivise the creation of 'large stands of pure aspen' would be to explore how it could be managed commercially alongside birch as a feedstock for biotech industries.

Any proposal to expand LISS systems must be more carefully researched and costed, to ensure that it does not result in forest management systems which are commercially unviable or less attractive to landowners than non-forest land uses, or that it results in a drop-off in timber supply which will threaten the existing sawmill businesses, and the growing significance of the Cairngorms

forest as an powerhouse of Scotland's sustainable economy. By resulting in oversized timber which is unattractive to sawmills, it can result in high-quality sawlogs being inadvertently degraded and used for chip.

Do you agree with the policy guidance on rural development?

yes

If not, how could it be improved?

It would also be beneficial to mention the potential for high-tech developments in wood processing here, to use what has been traditionally been regarded as low-grade timber such as birch and Scots pine as a feedstock for engineered building timbers and replacements for oil-based products. The Cairngorms has the potential to grow Scotland's sustainable cities of the future and substantially reduce our global environmental resource footprint; a focus on crafts and social enterprise risks underambition and employment becoming 'theme park management' instead of sustainable production.

It is not clear why 'where non-native species are required, European species are preferred'. Douglas fir, for example, has established an important role in Scottish forests, while species such as Western red cedar have important potential in the diverse conifer mix. Sitka spruce produces a financial return and sequesters carbon substantially faster than any other tree, and is more resilient than Norway spruce.

The action 'existing productive forests containing large, even-aged non-native coniferous species should be managed to increase species and structural diversity' is redundant as this is taking place already under UKFS. Rather than re-emphasising mistakes of the past, it would be more constructive to acknowledge the work already done by the Forestry Commission and private sector in the past fifty years to expand and improve the woodlands of the Cairngorms, resulting in the mature forests, skills, transport links and processing infrastructure on which the future Cairngorms forest will build.

Although not always the case in the past, for many years new forests designed for timber have been obliged to consider how the timber will be extracted. Rather than the restrictive proposal, 'the planting of forests designed with future timber extraction in mind is preferred in areas where there is already existing good road access', it would be better to say 'Support development of a strategy for the extraction of timber from areas suitable for timber production'. Access to broadleaf woodlands which will require management and could supply timber should be considered just as much as for conifers.

The emphasis on woodfuel in the section on carbon is curious. Woodfuel is important as a way to bring unmanaged woodland into management, but in the longer term, a far better carbon-strategy is to lock timber up for the long term in energy efficient buildings. It would be beneficial to expand this section, including figures on the carbon-sequestering potential of a) an expanded Cairngorms

forest and b) the use of timber from the forest. The UK 25 year environment plan includes new ambitions for carbon trading which may be valuable.

Do you agree with the policy guidance on forests and people? yes

If not, how could it be improved?

Do you have any other comments about the draft Cairngorms National Park Forest Strategy 2018?