

Confor response to Loch Lomond and Trossachs National Park Trees and Woodland Strategy

Confor is the not-for-profit organisation for sustainable forestry and wood-using businesses in the UK. We have more than 1,500 member companies representing the whole forestry and wood supply chain. Confor focuses on the strategic issues that are vital to the success and sustainable future of the sector. These include helping to build the market for wood and forest products, creating a supportive policy environment and helping members to become more competitive and successful.

Summary

The strategy requires more clarity on the financial basis of the delivery of its vision, which Confor suggests will be best achieved by enhancing the productive timber resource of the park rather than allowing it to decline. Confor would welcome greater consideration of woodland ownership, silviculture appropriate to the location, structures of sustainability governance such as certification, integration of forestry into whole-farm business plans, the economic importance of the forestry resource, and the management of increased public access to woodlands. The Landscape Toolkit has been welcomed by practitioners, and we look forward to seeing case studies of its use in practice.

Full response

1 Is there anything you would change about the vision?

There is a lack of acknowledgement of the balance of benefits we require from forests and the choices to be made to deliver these. It is unlikely that a 'native woodland habitat network' will deliver 'locally sourced timber' or 'carbon sequestration' at levels which are 'sustainable benefits from nature'. Nearby settlements like Glasgow and Stirling are already carbon emitters, and heavily reliant on timber harvested from overseas forests, and carbon-intensive materials such as concrete and plastic. For the surrounding countryside to reduce the timber producing and carbon-sequestering capacity of their forests would be a step back in sustainability. Although harvested timber appears to be carbon 'removed', if it is high-quality timber being turned into buildings in the

region, it will store carbon for many decades into the future and, more significantly, displace the carbon emissions associated with alternative materials.

The vision would be improved by changing 'a strengthened native woodland habitat network' to 'a strengthened mixed woodland resource'.



After 25 years, commercial softwood sequesters around 8x as much carbon as naturally regenerating native woodland. Timber removed at thinning or harvest is used in long-term nature-based products like construction timber and board. From Elaine Oneil, [Forest Carbon Considerations Linking Land Use and Wood Utilization](#), Michigan State University (2019)

2 b) Are there any changes you would like to make to the objectives and rationale?

The balance between productive and biodiversity woodland given on p.5 (22.5% productive conifer, 7.5% native) is likely to substantially overstate the productive resource. At the very least, 5% of the productive resource will have been converted to native woodland under UK Forestry Standard, increasing the native woodland cover to 8.6%, and a minimum of 25% of the productive resource converted to alternative species and open space to create biodiversity habitat. This means the maximum conifer cover of the park is 17%, with at least 8.6% native woodland, and the remaining 4.4% of forest area a mixture of species such as Larch, Norway spruce and Douglas fir, and open space. Other considerations, such as requirements to remove conifers from deep peat and around watercourses mean that the productive resource is likely to have been

reduced further. This can be easily seen by comparing the map on p.5 with satellite photographs of the conifer cover in the park.



Map

(Above: W. of Loch Eck; Below: W. of Loch Ard)

Satellite



Failing to replace this lost productive resource, by concentrating planting on native woodland, incurs the risk of reducing carbon, timber and employment benefits; and threatening its long-term management such as protection from herbivores, disease and fire, creation of paths and bike trails, drain reprofiling, or red squirrel conservation projects, which are all funded from the proceeds of timber sales.

The objectives and rationale should aim for net gain in both native woodland and high-quality timber production, based on a more thorough assessment of the forest resource, its forecast productive potential, and restocking levels following harvest.

The Strategy should make clear what the ownership profile of the forest resource is, in particular the split between public and private ownership; provide a vision for how it expects this to change in future either through new woodland creation

or asset transfers; and clarify the Objectives based on this information. In particular, there are frequent references to 'land managers/ owners' when the manager in question may in practice usually be Forestry and Land Scotland.

3 Is there anything you would change about the Management of Existing Woodlands section?

The objectives in this section are admirable but costly; and are unlikely to be delivered unless they are part of a financially sustainable forest resource.

This section should include a costing to demonstrate the current and projected income from timber sales from the forest resource, and the resulting budget which can be expected to be available for reinvestment in managing herbivores and invasive species, restoring PAWS, improving infrastructure such as roads, and benefiting flagship species.

Management techniques for productive conifer should be suitable for the site: for example LISS may not be suitable for the climate and soils across much of the park.

Management of the resource should take into account developing resilience to future climate change impacts, including higher risk of wind damage (especially for conifers) and wildfire (especially for native woodland).

4 Is there anything you would change about the Targeting woodland creation section?

There is little in the Productive Woodland Creation section which would not be delivered as a matter of course under the UK Forestry Standard. Any different requirements should be clear in how they add value to the woodlands, and not merely create further levels of complexity in an already-complex woodland creation process.

An interesting proposal would be to facilitate the creation of high-quality productive woodland by exploring a fast-track approvals scheme for independently-certified woodlands. Woodlands are not usually certified to FSC or PEFC standard until they are due to be harvested, as there is no benefit to the owner in having them certified earlier. If certification at the point of creation provided owners with a quicker and therefore cheaper process, it could become a cost-effective way to ensure diverse and sustainable forests.

5 Is there anything you would change about the strategy guidance on habitat enhancement?

The guidance should include a business plan linked to the costing exercise above, to ensure that income from timber sales across the woodland resource are adequate to deliver the enhancement envisaged, with proposals to encourage the private investment in productive woodland, and in due course the reinvestment in the woodland resource required.

6 Do you agree with the strategy guidance on landscape integration and special landscape qualities?

Yes. The Landscape Toolkit has received a very positive response from forest managers for its potential to deliver realistic and creative designs. It would be useful to see some case studies of its use in practice over coming years.

7 Is there anything you would change about the strategy guidance on integrating woodland and other land use?

The strategy should include the integration of timber production into whole-farm business plans. In the context of the likelihood of reduced agricultural subsidies, an element of timber production could be vital in ensuring farm businesses, with their associated landscape and production values, remain viable.

8 Is there anything you would change about the strategy guidance on social and rural economic development?

The guidance should be based on an assessment of the economic importance of the forestry resource, including timber, jobs, and ecosystem services, and a forecast of how the proposed guidance would change it.

9 Is there anything you would change about the strategy guidance on woodlands and people?

This section should include realistic proposals on how the park will ensure that public access to woodlands remains responsible, in an area with very high visitor numbers. Landowners should not have to bear the cost of impacts such as littering and fly-tipping, irresponsible fires, unauthorised huts or bike trails, or disrupted forest management work, as a result of facilitating greater access to woodlands. Measures provided by the park might include signage, penalties and enforcement for irresponsible behaviour, and infrastructure to encourage responsible behaviour such as litter bins, camping and picnic sites, and bike routes.

Eleanor Harris

07 June 2019