

Response ID ANON-XSSW-SGHH-Y

Submitted to **Scotland's Forestry Strategy 2019-29**

Submitted on **2018-11-29 12:18:07**

50-year vision and 10-year objectives for forestry in Scotland

1 Do you agree with our long-term vision for forestry in Scotland?

Yes

Please explain your answer.:

although we think that there is more scope for the forestry sector to increase the already substantial economic, environmental and social benefits of forestry to Scotland by addressing infrastructure challenges and harnessing opportunities.

2 Does the strategy identify the right objectives for forestry in Scotland over the next 10 years?

Yes

Please explain your answer.:

Realising the vision and achieving the objectives: the major issues to be addressed

3 Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives?

No

Please explain your answer.:

While the Forum agrees with the issues considered there is a clear omission with regard to timber transport and timber transport infrastructure. Within the time frame of the vision we should expect our transport infrastructure to meet the needs of the forestry sector and substantial progress in this regard should be made within the ten year period of this strategy.

Comments have been provided in relation to the existing issues raised.

4.2 Rural land-use, productivity and integration

Forestry can be a spearhead for wider rural development. Forestry covers 20% of our land area mostly in rural Scotland. It feeds value-adding manufacturing in the timber industries, mostly in rural towns. It provides well-paid, year-round employment opportunities in rural Scotland. As such there is great potential for this strategy to integrate better with rural development policies (rather than just land management policies).

Improvements to transport infrastructure is key in this regard. The Land Use Strategy has consistently failed to recognise that the scope for realisation of land use potential and associated local value-adding manufacturing is directly linked to accessibility to skills and markets. Infrastructure therefore requires a specific objective within the forestry strategy particularly because it requires wider integration with government policies and strategies.

Because forestry (and farming) fall outwith local authority planning processes, and indeed are largely bypassed by the national planning framework, there is no mechanism for consideration of freight infrastructure in relation to rural land use. The Timber Transport Forum is providing an interim partial measure but, in the period of this strategy, it would be sensible to encourage more formal mechanisms where local authority and national transport infrastructure development was informed by, accommodated and encouraged rural land uses.

The forestry sector's demand for freight transport capacity improvements provides a spur for targeted (but substantial) modernisation of our rural transport infrastructure. In this we include rural trunk roads (there are 3,578km of trunk road), rural local roads (the council maintained A,B,C and Unclassified roads - there are about 30,000km of these of which timber transport uses about 10,000km) rural rail freight tracks, passing places, sidings and access points as well as rural harbours and ports.

Rural Scotland's transport infrastructure requires substantial modernisation if rural Scotland is to function in a de-carbonised economy. The real opportunity is to relate the freight infrastructure demands of forestry to associated demands for other freight-requiring sectors – minerals, whisky, aquaculture, fishing, construction, farming, renewables, power grid, manufacturing, retail, recreation and tourism – to justify and drive rural transport infrastructure improvements. These, in turn, will further strengthen the rural economy and rural communities. The Scottish Government's recent attention to improving the information base on the rural economy will help in this regard. However, the resources and mechanisms for such integrated planning are lacking. While the councils or Regional Transport Partnerships (or similar body) could lead on this, the Forum believes that the scope of the work and the level of skills and investment required does make this a national issue.

By the end of the ten-year period of the strategy, it is likely that most areas of existing commercial softwood plantation will have been harvested at least once. Few areas (excepting recent new planting) will remain to experience timber transport for the first time. Now is therefore a good time to initiate a programme of infrastructure improvement.

The Forum would suggest that the Scottish Forestry Strategy directly informs the ongoing work by Scottish Government in reviewing the National Transport Strategy, resulting in a clear, long term commitment to a programme of rural transport infrastructure modernisation - echoing the recent call from Scotland's National Council of Rural Advisers for robust rural infrastructure.

4.3 Economic development: national regional and local

On page 22 under 'sustainable growth' is one of the few references in the consultation document to 'timber transport' - in this case as a negative impact on communities and the environment.

In fact, timber transport is hugely positive element of a carbon-positive supply chain maintaining skilled, well-paid jobs in rural Scotland, maintaining haulage companies and HGV servicing resources on the periphery of Scotland, and offering return haul opportunities to serve rural Scotland. The 2015 study into the economic benefits of forestry gave timber transport a GVA of £50m/yr.

The demands of timber transport are attracting investment in minor road improvements, harbour developments and (hopefully) in rural rail freight access points, all of which have wider benefits for rural communities. Timber transport has already been a substantial player in the maintenance and development of coastal shipping infrastructure and services for rural Scotland.

Any negative impact of timber transport is primarily because of the limited capacity of the transport infrastructure.

Our rural roads and trunk roads are dated, resulting in far longer journey times and far higher fuel consumption than modern roads. These limitations will equally apply in a de-carbonised economy limiting range and efficiency of electric, hydrogen and hybrid vehicles. The ongoing modernisation of the A9 and A96 are welcomed but this level of modernisation is required throughout the strategic (trunk) road network. At a minimum our rural trunk road network and major local A roads should accommodate freight at 50mph as in England and Wales. In many places the trunk roads are narrower than the standard for modern roads and require realignment, widening and some dualling to reduce the conflict between freight haulage and resident and visitor traffic.

Rural ports often date from the Victorian era and the road network serving them and their storage and loading capacity can be severely limiting. Much more could be done particularly if Scottish Government mode shift revenue grants, designed to meet the needs of countries with inland freight-carrying waterways, could be similarly applied for domestic freight to Scotland's geography of sea lochs, estuaries and the channels of the Inner Hebrides.

The Scottish Government should review modal shift revenue support for domestic waterborne freight to suit it to Scotland's coastal geography.

As we move to an established second rotation forest resource more effort must go into creating and maintaining in-forest infrastructure particularly the forest roads and the interface between harvesting and haulage. Roads, turning areas, stacking and loading facilities and forest accesses from the public roads should be well-planned and well built providing an efficient, safe and robust working environment. Growers, buyers, agents and hauliers will need to collaborate to set and promote standards in this regard and Scottish Government should consider mechanisms to support this.

There remain opportunities to share infrastructure to access forests with other rural land uses, such as windfarm roads, power grid access tracks. This optimises use of resources and minimises the environmental impacts of road construction. Again because forest roads are not generally considered by planning authorities there may be less opportunity to encourage such sharing. Other mechanisms should be encouraged.

The Scottish Forestry Strategy should encourage shared use of private access infrastructure.

Our rural rail freight capacity has been consistently depleted to the extent that a business trying to access rail freight services in rural Scotland has multiple challenges to overcome. Scotland's Rail Freight Strategy has set targets for rail freight growth. Timber offers a clear market for rail freight particularly where the road infrastructure is lacking. Again, timber freight offers demand for rail track and service modernisation that is anyway long overdue on Scotland's peripheral rail lines serving the north, north west and south west – (and the Borders).

Scottish Government should look to invest in rural freight infrastructure and services for the forest and timber industries recognising this as a mechanism to lead and encourage economic growth across rural Scotland.

4.4 Innovation and new technology

The Forum agrees, there is scope for substantial modernisation of the supply chain in the fields of robotics, automation, telematics and de-carbonisation.

Timber transport vehicles are already state of the art machines, now with remotely controlled cranes, telematics and road friendly technologies. In the period of the strategy, haulage will start to move (perhaps quickly) towards de-carbonisation and to the various stages of autonomous 'driverless' vehicles. There is a risk that the mainstream de-carbonisation processes could leave rural Scotland behind with old technology and out of date infrastructure.

Timber transport has several features which provide a neat opportunity to turn this around and enable rural Scotland to lead the field. Timber road hauliers, by necessity, maintain a relatively modern fleet. Much haulage is relatively short distance, <100km, on known routes, visiting timber processors that are often electricity generators. Timber transport occurs in areas that are rich in renewable energy capacity but constrained in grid capacity offering the scope for lower-cost local consumption of electricity and hydrogen – for lorries, boats and trains.

Timber transport should be a focus for the development of electric, hydrogen and hybrid HGVs, trains and boats.

On-road electrification should be trialled on regular timber haul routes and charging points and servicing resources developed.

4.5 Developing future foresters and upskilling existing workforce

This skills issue is also reflected in timber transport and rural transport more generally. There is a clear need to attract people into timber transport and for sector-specific training. Timber haulage is a particular skill-set working beyond the boundaries of general haulage. It takes several months and considerable operational cost to train a crane lorry operator and ongoing CPD is required in a range of areas including non-technical subjects such as engaging with communities and conflict management. Much of the timber haulage sector is small family companies with little capacity for formal training particularly where trained staff can leave to work for others. The sector should look to encourage those companies delivering quality haulage by ensuring haulage rates reflect their approach to quality and sustainability and by improving stability of work through longer term contracts.

The Scottish Forestry Strategy should include timber haulage providers in measures to train and up-skill the workforce.

Safety is relevant in this regard and we will refer you to the FISA response to the strategy but the main issues relating to timber transport are load security, electricity cables, access and in-forest loading & haulage infrastructure as well as facilities for drivers.

While driver training is required there is a more fundamental problem that needs addressed if we are to maintain a skilled workforce. More young people of working age must choose to live and work in rural Scotland. The forestry sector has tended to keep to the fringe of rural development policy – staying in the realm of land management (farming, forestry and fishing) policy.

Foresters and forest policies need to be far more active and involved in the development of wider rural policy – improving rural infrastructure and services, providing affordable homes and offering stable, well-paid employment opportunities. We would again refer you to the recent NCRA recommendations to government. Through the course of the strategy period, forestry should seek to position itself as a key rural development sector as much as a land management sector.

4.6 Climate Change

Timber transport is a carbon-emitting stage in an otherwise carbon sequestering or displacing supply chain. Timber lorries themselves are remarkably efficient but, as mentioned with regard to economic development, the poor road infrastructure contributes considerably to carbon emissions both in higher than normal fuel consumption and road maintenance. Sustainable forestry must consider the supply chain and invest in robust efficient logistics and related infrastructure.

Technology and innovation can play a part as previously noted. Modal shift from road haulage to coastal shipping or rail is an option in some situations but as stated previously requires public investment in access to rail and sea freight and adjustments to the modal shift revenue grant system for domestic waterborne freight to suit it to Scotland's geography.

Delivering the vision: priorities for action and policies for delivery

4 Do the ten priorities identified capture the areas where action is most needed to deliver our objectives and vision?

No

Comments.:

The priorities (like the issues) ignore transport infrastructure which is a constraint to the efficiency of the supply chain and a limiting factor in woodland expansion.

A positive approach to this could substantially help deliver and broaden the vision of a land use integrated with the wider rural economy and supporting rural communities.

Policies for delivery

5 Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

Comments.:

The Timber Transport Forum and the Strategic Timber Transport Fund have been effective for two decades in managing use of our existing rural infrastructure for a growing timber industry and in delivering rural transport infrastructure improvements related to forestry. Both should be continued in the interim but with a view to reducing the need for them by addressing the challenge throughout the course of the strategy period.

The Scottish Forestry Strategy provides an opportunity for better policy integration with the wider rural economy, better understanding of how our rural land is used and better engagement with national and local authorities responsible for planning and promoting transport infrastructure and modal shift.

6 For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

Comments.:

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Monitoring and reporting

7 Do you think the proposed progress indicators are the right ones?

Not Answered

Please explain your answer.:

-

8 Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

Comments.:

-

9 For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

Comments.:

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Impact assessments

10 Would you add or change anything in the Equality Impact Assessment (which includes our assessment of the potential impact of the strategy on inequalities caused by socioeconomic disadvantage – Fairer Scotland Duty)?

Comments.:

-

11 Would you add or change anything in the Business and Regulatory Impact Assessment?

Comments.:

-

12 What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?

Comments.:

-

13 Should any additional evidence sources be used in the Environmental Report?

Not Answered

Please provide details. :

-

14 What are your views on the predicted environmental effects as set out in the Environmental Report?

Comments.:

-

15 Do you agree with the conclusions and recommendations set out in the Environmental Report?

Not Answered

Comments::

-

16 Please provide any other further comments you have on the Environmental Report.

Comments.:

-

Conclusion

17 Do you have any other comments you would like to make about the draft strategy for forestry in Scotland?

Comments.:

-

About you

What is your name?

Name:

Timber Transport Forum

What is your email address?

Email:

roland@confor.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Timber Transport Forum The Timber Transport Forum is a voluntary partnership organisation set up in 2000 to address the issues raised by timber transport in Great Britain. The Forum includes representatives of the forestry and timber industries, the local roads authorities and various national agencies and organisations, including Forestry Commission England, Forestry Commission Scotland and Transport Scotland (freight). Much of the 7m tonnes of timber harvested each year in Scotland comes out onto minor rural roads, often several lorries per day for several weeks while harvesting a particular area of forest. On narrow roads this can disrupt other road users and on weak roads there is a risk of damage from repeated heavy traffic. The timber industry works with local authorities to manage both the timber traffic and the roads to minimise disruption and damage. Where required, timber movements can be restricted to particular times of year, the number of lorries per day can be reduced, and road-friendly lorries with a larger tyre footprint used to spread the load. These measures help sustain the road network but they do reduce the efficiency and increase the cost of the timber supply chain and can limit forest management options.

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: