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Dave Boulton,
Defra – Rural Funding Review Unit,
Area 4E Ergon House,
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Dear Dave Boulton,

**Public Consultation on the Rural Development Programme for England 2007-2013
Response from the Farm Woodland Forum**

I attach responses to the questions posed in the Public Consultation on the Rural Development Programme for England 2007-2013.

Four core principles

Question 1: Do you agree with these four principles?

In principle 2, the criteria that “funding must deliver something that would not happen otherwise” seems potentially flawed. Taken literally, it would mean that farmers who would automatically undertake an environmentally-beneficial action would receive no support and only farmers taking no consideration of the public impact of their actions would benefit. Such a scenario would actively discourage all farmers from considering public benefits until paid to do so. In practice, SFP-Cross Compliance, Entry Level and Higher Level schemes represent a gradation of support, so a better expression would be ‘funding should be in proportion to the cost and effort expended by the farmer in delivering societal benefits’.

Question 2: Are there any other overarching principles that should apply?

Simplicity, transparency and speed of payment should also be criteria in the programmes. An additional principle is that England should not be disadvantaged by the English implementation of the programme relative to other UK regions or European countries.

Question 3: Do you agree that the proposals in this document support these four principles identified?

The subsequent document doesn’t make clear how “local” as opposed to “regional” priorities are accounted for. In fact the document doesn’t actually have many concrete proposals at all! It has a number of issues and priorities – within which we don’t find enough emphasis on supporting economically productive agriculture and forestry WHILST at the same time maximising environmental benefits. Until we have sight of which of the RDR articles (Measures) are going to be implemented in the “Programme for England”, it is difficult to endorse this draft strategy. Annex A should have been commented upon with initial indications of which Measures are likely to be implemented.

Complementing and co-ordinating with other EU funding

Question 4: Do you agree with these proposals for ensuring that Rural Development spending complements other policies and funding streams?

We support the thrust of the sentence in paragraph 23 that “EAFRD funding should be focused primarily on supporting diversification of rural economies at a local level including supporting innovative farm diversification and woodland enterprises.” Innovation is the key and should not be obstructed by rigid policies. In other European countries innovative rural grants are sometimes available providing that results are monitored and disseminated in collaboration with colleges or research institutes (further details available from us if required). Structural Funds (e.g. INTERREG) have supported significant forestry and agricultural schemes in other EU countries, although opportunity for access to these funds is increasingly restricted in England.

Theme 1: Enhancing the environment and countryside

Question 5: Do you agree that the challenges and priorities listed under this theme are the right ones for the programme?

We support the point made in paragraph 40: “There is a significant under-utilisation of the timber growing in England. Estimates indicate that less than 25% of the hardwood timber that could be harvested sustainably from our native woods is actually being harvested, and one result is that land under woods becoming shaded resulting in a decline in woodland plant diversity”. We believe that promotion of agroforestry (in the broadest sense of farming with trees) is one way of encouraging farmers to manage trees.

Question 6: If not, what is missing or superfluous?

It is unclear why “Promote sustainable forest management” should have a separate paragraph heading, whilst “promote sustainable agricultural management” does not! There is a need to combine thinking on agriculture and forestry in farming, and the inclusion of the term ‘agroforestry’ into the policy documents would help achieve this.

Greater emphasis should be placed on the maintenance and establishment of field trees, hedges and farm woodland. Farm woodland is only briefly mentioned under Axis/Theme 3 and is therefore eligible for only a share of the 10% funding allocated to “Enhancing opportunity in rural areas”. It should be brought up front in Axis 2/Theme 1 (“Enhancing the environment and countryside”). The Forestry Commission has estimated that there was a 60% reduction in the number of field trees in England between 1980 and 1998; a decline even greater than that in farmland birds! We believe that a programme to promote the establishment and management of widely-spaced trees through an agroforestry establishment and management programme can be made on social, environmental and economic grounds.

Greenhouse gas emissions are considered to represent the greatest environmental cost of UK agriculture, but the reduction of such emissions is not a priority. It should be. We note that agroforestry can offer substantial benefit in terms of carbon sequestration (both in trees and in the soil) and in minimising greenhouse gas emissions.

Biomass production can help sustain the economic value of environmentally important woodlands. The document tends to over-emphasise opportunities for short-rotation coppice and neglect the opportunities for forest, woodland (e.g. coppice with standards), hedgerows, riparian strips and parkland to generate fuelwood as an ancillary product.

Question 7: What should the balance between priorities be?

We think that the first priority should be the title “promoting sustainable agricultural, agroforestry and forestry management” so that the attributes attributed to forestry are also related to agricultural and agroforestry systems. Hence “Protecting environmental capital”, “Supporting recreational benefits”, “Protecting water quality and flood alleviation”, providing

“quality of life benefits” and “biomass production” are not just an aspect of forest management, but also of agricultural and agroforestry management. The current set of priorities suggest that there was one a set of criteria developed by Natural England and one set drawn up by the Forestry Commission with little joined-up thinking. When will Defra learn that land management includes a continuum ranging from agriculture to forestry, and not two separate enterprises?

Question 8: What would best enable delivery of this theme to be joined up with delivery of other themes?

Again, joined up thinking between agricultural and forestry management is needed. The continuing split between Natural England and the Forestry Commission acts against this. We believe that the specific incorporation of the term ‘agroforestry’; i.e. the integration of trees with farming, into the programme literature is a useful first step to overcome this artificial divide.

Theme 2: Making agriculture and forestry more competitive and sustainable

Question 9: Do you agree that the priorities listed under this theme are the right ones for the programme?

More information is given on specific priorities in this Theme/Axis than for Theme 1, yet only 10% of spending will be devoted to this theme. From the long, and badly structured list of options it is not clear which are the real ‘priorities’. It is also not clear why it was necessary to depart from the European RDR Axis structure – the proposed shuffling of Measures, will greatly complicate reporting and international comparison.

Question 10: If not, what is missing or superfluous?

In Paragraph 47 under ‘innovative approaches’ – one of the bullet points should mention ‘agroforestry’ and its ability to integrate land management practices.

Question 11: What other developments might shift the priorities under this theme in the course of the programme?

We hope that there will be increased support for regional branding initiatives. Issues such as energy and food security have the potential to increase in importance.

Question 12: What would best enable delivery of this theme to be joined-up with delivery of other themes?

The listed priorities need to be clearly structured, rather than a random list of 11 items. Again the priorities seem to comprise an agricultural list and a forestry list with little attempt to integrate the priorities. We think that specific mention of ‘agroforestry’ would encourage joined-up thinking, so for example, the last priority rather than “raising awareness of the potential of woods on farms” should be “raising awareness of the potential of woods and agroforestry on farms”.

Theme 3: Enhancing opportunity in rural areas

Question 13: Do you agree with the priorities listed under this theme?

Yes, in broad terms. We support the fostering of “innovative farm diversification and woodland enterprises”. Again ‘agroforestry’ and ‘enterprises using small-dimension wood’ could receive specific mention.

Question 14: If not, what alternatives do you suggest and what evidence supports your suggestion?

No comment

Question 15: How do we balance focus on specific area experiencing particular concentrations of low pay with this problem in wider society?

No comment

Question 16: How do we ensure that delivery of objectives under this theme is mutually supportive of those under other themes?

No comment

The Leader approach in the new programme

Question 17: Do you agree with the regional flexibility outlined here?

Yes, in broad terms. A key factor is that the programmes are well promoted, and easily understandable. We support an emphasis on fostering sustainable energy through local heat and power projects using timber from local woodlands or energy crops.

Question 18: What is the Leader approach best placed to deliver?

It seems an appropriate method to deliver “regional” initiatives. However an analysis of current Regional Forestry Strategies has revealed a lack of thinking 'outside the box'. Only two of the English Regions mention farm woodlands for example. It is necessary to integrate agricultural and forestry planning at regional level, as well as increasing collaboration between Natural England and the Forestry Commission.

Delivery arrangements

Question 19: Do you agree with the balance between national strategy and co-ordination on one hand and regional flexibility on the other?

No comment.

Question 20: Do you have suggestions for adjusting the model proposed?

See previous comments on: a) the need for joined-up thinking on land management between Natural England and Forestry Commission England; b) specific mention of agroforestry (and perhaps specific types of agroforestry such as riparian buffers and parkland); c) recognition that farmers and woodland managers can be experimenters, and that they can be involved in participative monitoring of the environmental impacts of the scheme, together with local forestry and agricultural colleges. Research, flexibility, monitoring and dissemination of good practice should be integral to the delivery model.

I hope that these comments are helpful. Do not hesitate to contact me if you have any further questions.

Yours sincerely,

Paul Burgess
Secretary, Farm Woodland Forum (FWF)

note: the FWF also contributed to the English and Scottish consultations on the EU Rural Development Regulation (2007-2013) (see www.agroforestry.ac.uk/submissions).