



Cranfield University,
Silsoe, Bedfordshire,
MK45 4DT
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Maria Grace,
Defra – Forestry Policy Unit
Area 5D Ergon House,
Horseferry Road,
London,
SW1P 2AP
forestrypolicyunit@defra.gsi.gov.uk

Dear Maria,

Public Consultation on England’s trees, woods and forests: a consultation document

I attach some comments on the Public Consultation on England’s trees, woods and forests from the Farm Woodland Forum.

Why we need a new strategy?

- Section 1 should include mention of the following (but perhaps with application to England): The 1998 Forestry Commission survey of small woodland and trees estimated that there were 123 million live trees outside woodland in Great Britain. This included 36 million trees in groups of less than 0.1 ha, 5.8 million individual trees along boundaries, and 3.5 million individual trees within fields. It was also estimated that there were 77.5 million trees in narrow linear features such as windbreaks; an important feature in a country subject to some of the strongest winds in Europe. However the same report, citing a survey from 1980 which, although not directly comparable, suggests that the number of individual trees on farms declined by about 57% between 1980 and 1998. The reasons for the decline are likely to include factors such as Dutch Elm Disease and the need to remove irregularly planted trees with agricultural mechanisation. However many of these trees would have had important productive, conservation, recreation or landscape value.
- The CEH Countryside Survey shows progressive decadal declines in hedgerows and trees within them.
- In the list of Policies “UK Government commitment to the EU Forest Action Plan – June 2006” should be mentioned.
- The paragraph headed “patterns of rural land use and ownership” mentions natural woodland colonisation, conventional woodland planting and energy crops: It ignores the option for agroforestry (Article 44 of the new Rural Development Regulation).

Question 1. Do you agree with these principles and objectives of Government intervention in trees, woods and forests? If not, what principles and objectives should guide Government intervention?

In part we agree, but:

- Why can’t the objectives of the forestry strategy match those of the new UK Sustainable Development Strategy (paragraph number 14), with climate change mitigation and energy

security included as a separate objective? The current England Forestry Strategy document seriously underplays the potential role of trees in carbon sequestration and as a renewable fuel. It is not even mentioned under objective 2 which considers environmental objectives.

- Objective 1 “to safeguard England’s resource of trees, woods and forests for future generations” is uninspired and “safeguard” seems a very passive and backward-looking verb. Trees, woodlands and forests are dynamic living entities, they may become less appropriate in some locations, more appropriate in others. “to expand and enhance England’s resource of trees, woods and forests for future generations” would be a more inspiring aim.
- Objective 4 should mention “**English**” woodland products and services.
- Three of the objectives correspond to the common environmental, social and economic division of three of the four “pillars” of sustainable development. However there is no objective relating to institutional aspects. Hence there should be an additional objective relating to the institutional aspects of government intervention e.g. a role in supporting education, increasing public understanding, and the UK’s input to creating sensible international agreements.
- Remove all after “services” in the 4th bullet point. The other bullet points cover public benefit – there is an equal need to ensure private profitability.

Question 2. Do any regulations present a barrier to the sustainable management of trees, woods and forests and associated businesses and activities? Is so, what changes should be made?

Yes.

- Current proposals suggest that farmers with more than 50 trees per hectare on their land could forfeit single farm payments even though the trees offer animal welfare, environmental and landscape benefits. Options whereby farmers benefit from the integration of trees with agriculture should actively be developed. The Scottish initiative being implemented by the Forestry Commission at Breadalbane in Perthshire to pilot agroforestry schemes, identified by farmers, should be replicated in England.
- Liability to litigation when the public enter working sites or trip on woodland paths can be a disincentive to expanding public access – means of limiting this liability should be explored.

Question 3. Could we use public procurement policies more effectively to encourage the sustainable management of our existing woodlands without breaching Single Market rules or the need to obtain best value?

Yes.

- We find it surprising that we can still buy wood products in major stores which do not indicate the country of origin of the wood.
- Architects and public officials can easily stipulate local materials in vernacular or modern architecture. The problem is more about quality, price and availability!

Question 4. Do these seven types of intervention adequately express Government’s role in supporting trees, wood and forests?

Not quite.

- The seven areas mentioned include strategy, regulations, standards, research, capacity building, purchasing public benefits and direct action. These seem appropriate, but as indicated in Question 1, these actions could relate to an objective addressing institutional issues.
- We feel that there is a role for DEFRA in supporting research on trees, woodlands and forests, as trees, woodlands and forests need to be integrated with other research affecting the environment, food and rural affairs. It is unfortunate that neither DEFRA nor the

Forestry Commission is currently looking at the specific research needs of farm woodlands.

Question 5. Do you think we have got the balance right between the way national priorities will be expressed in the new Strategy and the scope for regional delivery to respond to local needs and opportunities?

No.

- Some of our Forum members remain sceptical about the ability of the regional forestry frameworks to deliver additional benefits beyond those possible at an English level. I understand that this was the conclusion of a recent UK PhD study (Mike Render, personal communication). However we support competitive regionally-based grants with potential for modification of national guidelines – let’s learn from innovation and subsidiarity.
- Only 2 of the Regional Frameworks specifically mention farm woodlands.

Question 6. Do you agree that creating new woodland solely for the purpose of carbon sequestration is not a national priority for forestry policy in England?

No.

Question 7. If you disagree, what evidence is there that creating carbon sinks should be a national priority for forestry policy in England, rather than an additional benefit of planting woodland for other reasons?

- First of all, why is “economic” always placed after “sustainable development”, “environmental” and “social” justifications for forestry. Let’s not downplay the need to stimulate timber markets and ensure profit for quality timber.
- The observed decline in organic matter content in agricultural soils, and the possibility of uncultivated land (e.g. woodland areas) reducing this decline, is considered an important element in the estimation of net carbon emissions by countries such as the USA. Why not the UK?
- Agroforestry is mentioned extensively in IPCC reports – it has the potential to enrich soil carbon on agricultural soils & should be mentioned here.
- No-one would plant trees solely for carbon sequestration. Question 6 is academic. What is more important is to emphasise the residence time of the carbon and focus on high quality timber for construction and furniture, rather than fuelwood or pulpwood which serve little C-sequestration function.
- Beware of an over-emphasis on coppiced willow and poplar. Promising clones have suffered disastrous attacks of rust and canker and coppiced willow is demonstrably susceptible, as a monoculture, to complete defoliation by blue willow beetle. SRC is harvested well before maximum mean annual increment. It is also not very effective in net energy terms. We may be better to emphasis medium rotation timber production on reasonable land, and residue recovery for energy as a co-product.

Question 8. Does the timber industry have adequate opportunities to promote English timber as an environmentally friendly substitute for other materials? If not, what are the barriers?

Question 9. If we are to achieve the substitution of wood fuel and timber for less sustainable fuels and products: i) what, if any, are the barriers to progress, and ii) what areas of activity e.g., skills, co-operative may need attention?

- We think that timber products on sale in the UK should indicate the country of origin of the timber.
- Lifecycle energy analysis, personal energy accounts, initiatives such as the 25/5 pledge (cutting personal energy use by 25% in 5 years) are all methods to raise the profile of local timber. The forestry sector should press for company sustainability audits (as advocated by the EU Parliament), and labelling of goods in megajoules and carbon used in production.

Question 10. As owners respond to new markets for woodland products, will the existing regulatory framework offer adequate protection against possible adverse impact (or woodlands and the wider environment) of large-scale reintroduction of management in existing woodlands or new planting? Will it do so without creating unnecessary barriers for woodland owners and managers competing in these markets?

- Re-introduction of management is unlikely to be deleterious. Traditional practices like coppicing, coppice-with-standards and high-pruning will re-introduce light and diversity to scrub woodlands. Heavy clearance and pasture sowing may re-establish parklands. Consideration should be given to the use of new tree species in most areas especially in relation to the consequences of global warming.
- Trees could provide shelter for expanding agricultural crops like vines, and new crops like olives and tea. This highlights the need for an integrated agriculture and forestry strategy.

Question 11. Do you agree that it is a national priority to understand how we must adapt our woodland management to ensure that woodland can continue to deliver the full range of benefits in a sustainable way as the climate of England changes?

- We agree that this is a priority, but it must go beyond just “understanding” to “adaptation”. The national priority related to climate change must also relate to the planting of new woodland and trees species. Guidance on new species and hybrids is critical and there would be benefits of greater European collaboration. We are not sure about the need to use the phrase “full range”. Some benefits may become less important (e.g. frost protection) as climate changes.
- The native species and provenance argument is less convincing in times of rapid climate change. Let’s consider species which give both environmental benefits and high economic returns, and be more open to use of currently excluded species like the foreign alders, hybrid aspen, *Pinus radiata*, *Nothofagus*, red oak, *Paulownia*, service tree, walnut (black and hybrid), hazelnut etc. New agroforestry plantings on agricultural land provide an opportunity for experimentation with these species/provenances in a way that may not be appropriate for conventional planting aimed primarily at nature conservation.

Question 12. Do you agree that it is a national priority to understand how we can use tree and woodland cover most effectively to manage water resources, protect soils and buffer against air pollution?

- We support this as a research priority, which DEFRA should be involved with. We should learn from experience in Europe where, for example, tree strips are planted in herringbone arrangements on flood-plains to channel floodwaters and collect debris.

Question 13. How and where could other Government policies contribute to delivering our biodiversity aims for trees and woodland?

- We support the establishment and maintenance of agroforestry systems (and other methods to integrate trees with farming) (taking advantage of RDR Article 44) within the rural development regulations and cross-compliance requirements. We hope that ‘stacking’ of grants will continue in England to allow SFPs to be maintained even when part of the farm has been put down to trees.

Question 14. How can Government best support its delivery partners in achieving these aims?

- We would like to see the Breadalbane pilot project, recently initiated in Scotland to look at support for agroforestry projects in a specified area, being replicated in England. Generally, grant conditions should allow local “experimental modifications” provided that the landowner undertakes to monitor and report on the results of the experiments (this happens in France for example).

Question 15. Do you agree that restoring open habitats by carefully targeted deforestation should be a national priority where this makes a significant contribution to the Government's biodiversity policies and to UK BAP targets?

- This practice seems sensible where appropriate.

Question 16. How and where could other Government policies contribute to delivering our landscape aims for trees and woodlands?

- We support the establishment and maintenance of agroforestry systems within the English Rural Development Plan (which hopefully will implement Article 44 of the EU Rural Development Regulation).

Question 17. How can Government best support its delivery partners in achieving these aims?

- We would like to see the Breadalbane pilot project to look at support for agroforestry project in a specified area, recently initiated in Scotland, being replicated in England.
- Parklands and hedgerow trees were a vital part of the English landscape. They are unlikely to be restored through a plethora of high-overhead agri-environment schemes. Better would be relaxation of the minimum density and block-width rules. Isolated and linear trees can give good timber if pruned properly and wisely.

Question 18. Do you agree that: i) promoting public access to woodland should remain a national priority and, ii) improving public access to woodland is a matter for regional and local decision makers to consider where there is unsatisfied demand?

- We are supportive that public access to woodland should remain a national priority. Parklands, tree-pasture, timber-strips, riparian buffers and farm woodlands generally are ideally suited to public access in rural and peri-urban settings.

Question 19. How should existing mechanisms to deliver public access be modified or, if new mechanisms are needed, what might they be?

- The Community Supplement in the old English Woodland Grant Scheme seemed a good model. The old Dedication Scheme takes a lot of beating too.

Question 20. What should be done to improve social inclusion in woodland access and recreation?

- Resources to support local education regarding the need to balance economic aspects of woodland management with social access and recreation seem important. More use could be made of community ownership schemes.

Question 21. Do you agree that provision of high quality facilities for public recreation in publicly and privately owned woodland is a national priority?

- We support the increased provision of high quality facilities. However who should fund this? See our earlier mention of injury liability when the public are "invited" into woodlands.

Question 22. Do you agree that it should be a national priority to promote the role of trees and woods within a network of green infrastructure in and around our towns and cities?

- We support the role of trees to provide a network of green infrastructure. Trees are an effective means of securing greenbelt, especially if planted by public participation. Why not allow local councils access to planting grants (as happens on continental Europe)?

Question 23. Do existing policies, mechanisms and resources adequately support planting and management of trees and woodlands as part of a green infrastructure? If not, what changes are needed?

- It is better to plant tree strips in flood-plains than implant houses which must be protected at public expense.

Question 24. How could woodlands within a new green infrastructure contribute more to other priorities, for example a growing network of non-motorised transport routes in and around towns and cities?

- Farmers can be encouraged to link set-aside areas to allow cycle paths adjacent to busy roads – especially near towns – with trees planted as linear features.

Question 25. How can we develop the potential of trees and woods to deliver educational and other social benefits and help to create sustainable communities? What can we learn from our own experience or that in other countries?

- Encourage farmers and peri-urban communities to integrate well-managed trees into farmed and suburban landscapes, whilst encouraging pruning and tending of trees as eventual sources of revenue.

Question 26. Do local authorities have access to the expertise, resources and technical support they need to manage our urban tree stock?

Not always.

- Support is often through short-term companies or agencies whose financial base is insecure.
- Resources for employing local authority staff for managing urban tree stock often compete unsuccessfully with other areas of expenditure. Expenditure on managing urban tree stock might well be “ring-fenced”.

Question 27. Do current regulations and guidance on policy and practice offer adequate protection for scheduled and unscheduled archaeological sites and other historic or cultural heritage sites in i) existing woodland and/or where woods are being planted or allowed to develop through natural colonisation?

- No comment

Question 28. Do you agree that Government support for capacity building, innovation and other supply-chain initiatives can contribute significantly to the profitability of woodland management?

- Yes, but in the Rural Development Plan only 10% of total funding is forecast for this Axis. Other countries give much greater importance to this (and the UK RDR spend is already the lowest in Europe/ head of the population).

Question 29. What are the priorities for capacity building and innovation?

- No comment

Question 30. Do you agree that all government support for sustainable woodland planting and management should be based on delivering the environmental, social and other public benefits of sustainable forest management, including the production of renewable energy and the economic regeneration of lagging rural areas?

- It does not seem necessary to include the phrase “of sustainable forest management” in the third line as it is already implicit. We would also say “sustainable tree and woodland ..” in the first line to indicate that it includes individual trees.
- The phrase “of lagging rural areas” should be removed, as regeneration projects in “progressive” or “urban” areas should also be potentially eligible for governmental support.
- (Paragraph 81) No tree planting anywhere is aimed “solely to produce timber” but we feel the pendulum has swung too far away from the objective of producing quality timber. Quality timber production and national economic benefits must be proudly up there at the head of the priorities – as it is in the EU Forestry Action Plan.

Question 31. Do you agree that i) there should be no net loss in the total area of native woodland in England, ii) that there should be a significant increase in the proportion of woodlands that are managed sustainably? and iii) there should not be a national target for woodland expansion?

Question 32. If not, what should the targets be, should they be split down to regional level (or finer) and how would you justify them?

- No net loss in the total area of native woodland raises issues about “native” at a time when climate change appears to be creating real effects and raises issues regarding the need to select new species.
- What does sustainably-managed mean? Without definition the phrase is vague. Why is the focus on the proportion of woodlands rather than the area of sustainably managed woodlands? A government could increase the proportion of sustainably managed woodlands by removing small areas of unmanaged woods. If there is a target it should relate to the area rather than the proportion.
- We would like to see a target for the maintenance of parkland and hedgerow trees which are a distinctive feature of the English countryside.
- We think that there should be a national target for woodland expansion (but modified Regionally) broadly consistent with the extremely low forest cover in England. We feel that this is important in order to maintain a reasonably stable level of national capacity in terms of contractors involved in woodland creation and maintenance. We feel new woodland planting is creating real and very visual benefits. In addition, without the incentive of national targets, regional government will spend their money on alternative activities. Furthermore why should the EU pay the UK any money for woodland expansion if it is not a national priority?

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

Yours sincerely,
Paul Burgess & Gerry Lawson
Secretary & Chair, Farm Woodland Forum