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Mr Paul Johnston,  
Forest Commission England,  
National Office,  
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14 January 2004

Dear Mr Johnston,

**Public Consultation on the English Woodland Grant Scheme (EWGS);  
response from the Farm Woodland Forum**

I attach some comments on the Public Consultation of the English Woodland Grant Scheme (EWGS) from the Farm Woodland Forum, which is the new name for the UK Agroforestry Forum. The comments relate specifically to questions 4, 9, 10, 11, 12 and 13.

***Question 4. Do you think that the activities proposed for WMG are appropriate and adequate? If not, what are your concerns and are there other actions that you would wish to see included?***

We support the inclusion of “Woodland health” and “actions such as re-spacing, pruning and thinning to improve light levels reaching the woodland floor and support healthy growth” within the range of activities that applicants will be able to select from. Furthermore, we wish to see specific mention of ‘management efforts to create, recreate and regenerate historic wood pastures and parklands’ and a definition found for such woodlands to allow them to be included within the woodland estate of a property on which WMG would be paid.

***Question 9. Do you think that the proposed woodland categories appropriately cover the new aims and priorities for EWGS support for woodland creation? If not, what do you think has been omitted?***

***Question 10. Do you think that the proposed eligibility criteria are appropriate to the woodland categories? If not, how could they be improved?***

***Question 11. Do you generally support the proposed arrangements for the WCG grant payment? Please tell us if anything in the proposals concerns and why?***

We welcome the introduction of the special broadleaved woodland category for “broadleaved species appropriate for growth at wide spacing”. We request that it is made explicit in the supporting documentation that this grant is available for appropriate agroforestry systems.

The eligibility criteria of “As agreed – minimum 100 stems per hectare” for the grant indicated in Table 2 appears generally sound. However the level of payment is not clear if

there were, say, 156 stems per hectare. In such cases will the payment be based on an interpolation of “small standard” and “special broadleaved” payments? If not, then the grower will tend to be drawn to the lower plant density. Likewise, what will be the grant if a grower wished to plant 80 trees ha<sup>-1</sup>, say as part of a parkland agroforestry system? Will the grower be eligible for a reduced pro-rata level of the “special broadleaved” payment? This would seem sensible. We request that there is flexibility for officials to interpolate between the categories, where appropriate, and to extrapolate reduced pro-rata payments if the stem densities at planting are less than the guideline values indicated.

The special broadleaved category specifies that the maximum spacing should be 10 m. In some silvoarable systems, at a stand density of 100 trees ha<sup>-1</sup>, a spacing of 14 m x 7 m will probably be more appropriate than 10 m x 10 m. This is because the 14 m spacing between tree rows will allow 12-m-wide machinery, e.g. sprayers, to pass between the rows of trees. We hope that the interpretation of the comment of “maximum spacing: 10 m” will not exclude, for example, spacings of 14 m x 7 m.

***Question 12. Do you generally support the changes to FWPS proposed above? Please tell us if anything in the proposals concerns you and why?***

Item 10.5.2 specifies that agreement holders of the WGS must undertake to maintain the woodland concerned for 30 years (in the case of mainly broadleaved plantings). However some stands of fast-growing species, such as poplar, will be ready for harvest between 20 and 30 years. The rules should be modified to allow this. In addition, future cultivars of broadleaves for furniture timber, such as cherry, ash, and sycamore, could have fast growth rates.

***Question 13. Do you have any comments on the proposed continuation of the above exclusions from the FWP bearing in mind that the payments are concerned solely with the conversion of agricultural land to woodland?***

We welcome the fact that the EWGS will be administered by a single agency and that the rules for planting, maintenance and income foregone payments can now be rationalised. We note that only 6 of the 97 groups responding to the ‘Policy Review of Woodland Creation in England’ disagreed with the statement that ‘agroforestry should be allowed in woodlands created with WPS/FWPS support’. We also note that the Steering Group Report for this consultation also agreed that agroforestry should be allowed in such areas. This was only recommendation from 25 made by the Steering Group which was not accepted by DEFRA/Forestry Commission.

The current consultation says: “(viii) Planting for the purpose of agroforestry – we consider that the potential disadvantages of accommodating agroforestry under the FWP, in particular the difficulty of coming up with a simple mechanism for adjusting income forgone payments to take into account of this without risking significant under or over compensation in certain circumstances outweigh the advantages. Furthermore, although we are not against the principle of encouraging appropriate agroforestry, we question whether the FWP is the right mechanism for achieving this.”

In France, the circular “Circulaire DERF/SDF/C2001-3020, DEPSE/C2001-7034 du 8 Août 2001 – PCR” allows farmers who plant trees in an agroforestry system to get compensatory payments for the uncropped area below the trees. We believe that such a system could be operated here. There are four broad categories of planted agroforestry that may seek receipts from a Farm Woodland Payment Scheme. These are illustrated in Figure 1.

1. Farm woodland. This category (Figure 1a) includes the woodland types, described within the Woodland Creation Grant as “standard”, “small standard” and “native” woods. Such

woodlands will often be eligible for Farm Woodland Payments and livestock will generally be excluded from such areas. However the Scottish Forestry Grants Scheme Farmland Premium Rules and Regulations paragraph 36 includes the phrase that “Grazing in Farmland Premium supported woodlands will not be allowed other than as a conservation/silvicultural measure at the discretion of FC Scotland/SEERAD Technical Staff.” In England, the Farm Woodland Forum requests the possibility of grazing in Farm Woodland Payment areas as a sanctioned conservation or silvicultural method.

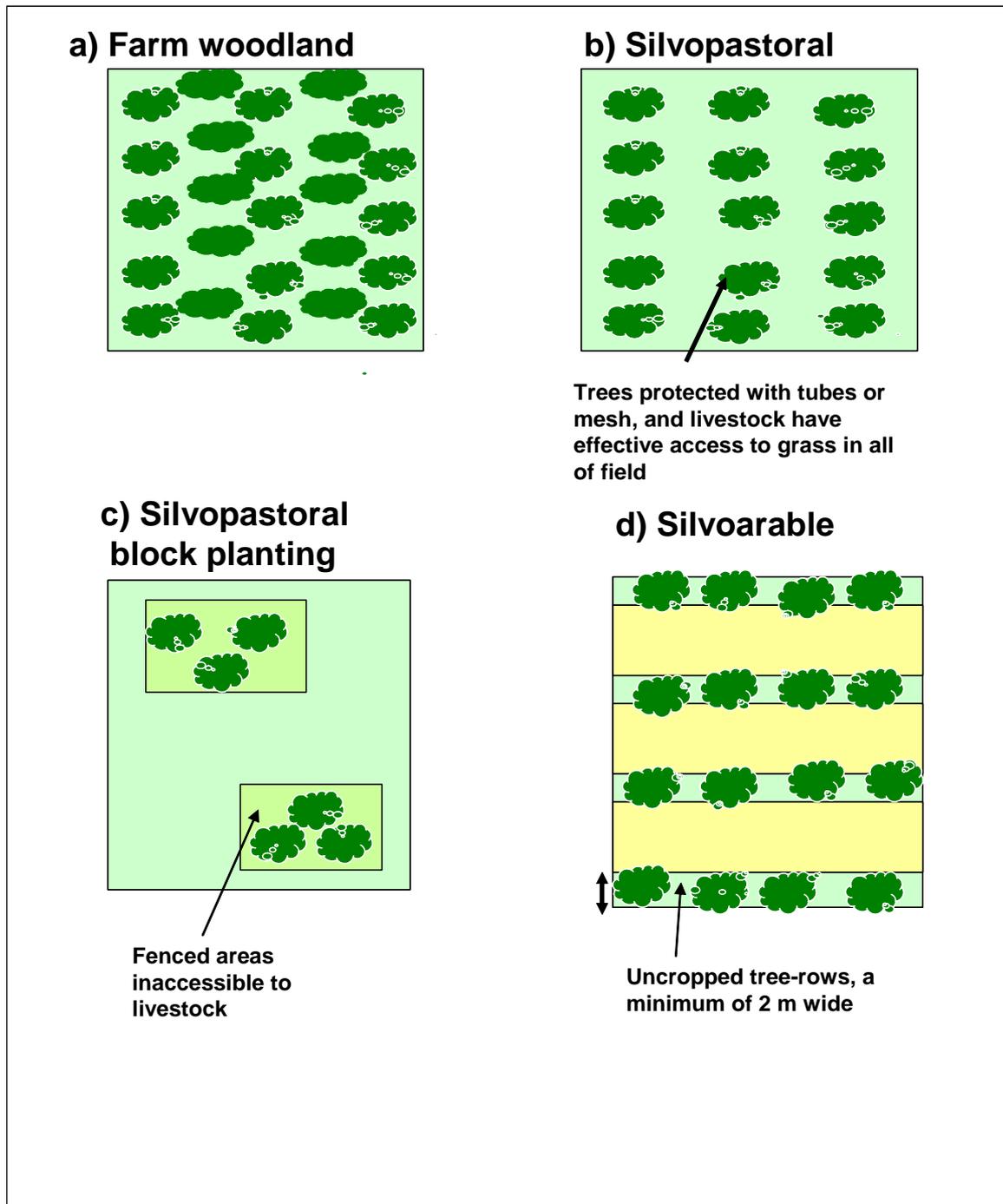


Figure 1 *Schematic diagram of four categories of agroforestry*

2. A second category will be silvopastoral systems, typically of the “special broadleaved” type, where the farmer intends to maintain grazing and the trees are individually protected by

tree shelters or meshes i.e. Plates 14 and 15 in Hislop and Claridge (2000) and Figure 1b. Effectively, livestock can maintain full access to all of the pasture. In such situations, the reduction in pasture production is often minimal and it is difficult to argue for a compensatory Farm Woodland Payment on that basis. However, it seems likely that the move to Single Farm Payments incorporating payments based on 'Pasture Area' (Regulation 1782/2003) will introduce an arbitrary distinction between 'pasture' and 'woodland'. An EU guideline suggests that areas with more than 50 stems per hectare may be classed as 'forest' and therefore be ineligible for the pasture element of the single farm payment (AGRI/2254/2003). In such circumstances an income compensation payment will certainly be required

3. A third category of silvopastoral system is where the trees have been planted and **fenced** as individual trees, or in small blocks or "clumps" within pasture (Teklehaimanot and Sinclair, 1997; Burgess *et al.*, 1999)(Figure 1c). The blocks are usually permanently fenced and grazing livestock do not have access to the area within the fence. In such situations, as at present, the ungrazed area within the fence should be eligible for Farm Woodland Payments on a pro-rata area basis.

4. In the UK, the trees in agroforestry systems involving cropping (silvoarable agroforestry) will be planted in easily identifiable rows to enable mechanisation i.e. Plates 11, 22 and 23 in Hislop and Claridge (2001) and Figure 1d. Because farmers will not risk using machinery near the trees, the system necessitates an uncropped tree-row that is at least 2-m-wide (Burgess *et al.*, 2003), where it is not possible to harvest a viable crop. This 2-m-wide-tree-row should be eligible for Farm Woodland Payments. For simplicity we propose that a constant 2-m width is assumed, irrespective of the actual cropped area.

I hope that these comments are helpful. Do not hesitate to contact me if you have any further questions. The Farm Woodland Forum would welcome the opportunity to make a presentation to the committee, in consultation with our French colleagues, to explain these alternative approaches to the payment of forestry, agricultural and agri-environment grants.

Yours sincerely,

Paul Burgess  
Secretary, Farm Woodland Forum

#### References

- Burgess, P.J., Brierley, E.D.R. & Goodall, G.R. (1999). The financial costs of farm woodland establishment at four sites in Bedfordshire, England. In: Burgess, P.J., Brierley, E.D.R., Morris, J. & Evans, J. (eds). *Farm Woodlands for the Future*. Oxford Bios Scientific Publishers Ltd. pp. 81-94
- Burgess, P.J., Incoll, L.D., Hart, B.J., Beaton, A., Piper, R.W., Seymour, I., Reynolds, F.H., Wright, C., Pilbeam & Graves, A.R.. (2003). The Impact of Silvoarable Agroforestry with Poplar on Farm Profitability and Biological Diversity. Final Report to DEFRA. Project Code: AF0105. Silsoe, Bedfordshire: Cranfield University. 63 pp.
- Hislop, M. & Claridge, J. (2000). *Agroforestry in the UK*. Forestry Commission Bulletin 122. Edinburgh: Forestry Commission
- Teklehaimanot, Z. and Sinclair, F.L. (1997). Henfaes – Annual Report 1996. *Agroforestry Forum* 8(1) p16.