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Dear Nia Jones,

**Response to the Policy Review of Woodland Creation in England under the  
Woodland Grant Scheme and the Farm Woodland Premium Scheme**

This response is on behalf of the UK Agroforestry Forum. The UK Agroforestry Forum is a national forum which seeks to promote farming with trees. The current membership is about 200. Each year, the Forum holds a national meeting which attracts farmers, foresters, advisers, researchers, students and representatives of conservation agencies. We have given particular attention to answering Q28 on agroforestry and will be pleased to be consulted further should you wish.

Yours sincerely,

Dr Paul Burgess  
Secretary, UK Agroforestry Forum

**UK Agroforestry Forum Response to  
the Policy Review of Woodland Creation in England  
under the Woodland Grant Scheme and the Farm Woodland Premium Scheme**

**Section A: Policy Issues**

***Q. 1 Is the rationale and philosophy for central government support for woodland creation sound? If not, why not?***

The government is correct to intervene in woodland creation to ensure the provision of significant economic, environmental and social benefits that would not be otherwise be provided. The benefits that trees can bring to sustainable rural development include:

- landscape and amenity - the English landscape is primarily an agroforestry landscape, where trees are integrated with pasture, crops and amenity areas.
- biodiversity - the incorporation of trees in farming can increase the diversity of invertebrates, small mammals and birds, compared to pasture or crops systems alone.
- product diversification with environmental and economic benefits - trees primarily encouraged for environmental reasons may also have productive functions. For example buffer zone trees can produce timber, fruits and nuts, and flood-control coppice systems can produce biomass energy thereby mitigating greenhouse gas emissions.
- animal welfare – integration of trees with pasture can offer a more welfare-friendly production system than pasture alone.
- carbon sequestration
- mitigation of pollution – trees can provide a filter function in the landscape capable of capturing and recycling nitrogen and phosphorus that would otherwise flow into and pollute watercourses, and
- flood control - where agricultural land use has led to high runoff and flash floods, the strategic placement of trees and contour hedgerows can increase water infiltration and transpiration and reduce flood risk.

***Q. 2. What should be the key criteria in constructing a scheme to encourage woodland creation to generate public benefits.***

Relevant criteria for constructing schemes to encourage woodland creation are:

- the delivery of measurable public benefits, and
- the need to cover extra costs to the owner of providing those benefits.

***Q. 3. What are the main barriers to woodland creation?***

The main barriers to woodland creation include:

- the concern that tree planting on farmland might significantly reduce land value.
- the lower profitability of traditional woodland than most forms of agriculture.
- the lack of a market for woodland products.
- the lack of experience of farmers of woodland management. Although this may not be perceived by farmers, it can affect the quality of woodland products.
- increasing deer populations having significant impacts on woodland management (in terms of regeneration, silvicultural health of woodland and timber quality) and

woodland establishment (the necessity to fence or use 1.5-1.8 m shelters almost doubles establishment costs).

- the time and professional inputs required to submit WGS applications.

Some of these barriers to woodland creation can be alleviated by promoting a diversity of ways of integrating trees into the landscape. For example, many of the environmental benefits of trees can be achieved by hedgerow planting. Systems such as nut crops and hazel coppice can provide an earlier income than traditional forms of woodland. Concern about the costs of transferring land back to agriculture at the end of a rotation can be reduced by planting trees at wide spacings e.g. as in agroforestry, which will enable farmers to maintain both forestry, livestock and/or cropping enterprises for many years.

***Q. 4. How might government departments and agencies work more effectively together to encourage woodland creation?***

Ideally there should therefore be a common framework for assessing the economic, environmental and social benefits of a range of land management systems. Such a framework would allow government schemes to be more flexible in dealing with a wide and diverse range of land management systems, rather than the current schemes which tend to promote monocultures of crops, grass or trees.

***Q. 5. Are the objectives of Government support for woodland creation sufficiently well integrated with those behind its support for other environmental measures? If not, can you suggest practical ways in which this integration could be improved.***

No. In order for woodland creation to be integrated with support for other social, economic or environmental measures, there needs to be a common framework for assessing the social, economic or environmental benefits of different land management systems.

## **2. Aims and Objectives of Woodland Creation Grant Schemes**

***Q. 6. Are the existing aims and objectives applying to WGS and FWPS still relevant? If not, how should they be updated?***

The old objectives are still valid, but they should be modified to reflect better the objectives of the English Rural Development Programme (ERDP). For example, the ERDP puts a high emphasis on a diverse economy giving stable levels of employment. In addition to landscape and biodiversity objectives, the WGS and FWPS should support schemes, which can provide growers with a steady income for a number of years as they learn to manage multi-purpose woodlands. This may include an agroforestry option to the WGS Annual Management Grant scheme that would encourage the creation of agroforestry habitats and high value woodland products.

## **3. Targeting**

***Q. 7. How might the WGS and the FWPS be modified further to better achieve the woodland creation aspirations of the EFS?***

For the WGS, it is important that landowners don't make a loss establishing woodland. In some regions, potential deer damage necessitates extra costs associated with protection from browsing. Similarly in silvopastoral systems, protection of the trees from sheep is essential to produce healthy high value trees. An extra supplement, possibly called the 'Tree Protection Contribution', of £600 ha<sup>-1</sup> could be

made available in areas where deer are a recognised problem or where the trees form part of a silvopastoral system.

The FWPS should be flexible enough to offer support for silvoarable and clump-planted silvopastoral systems (See answer to question 28). In addition, FWPS payments depend on the land qualifying for the Better Land Supplement under the WGS. This is not a problem with arable land but in relation to grassland where it is semi-improved, payments are frequently refused. This is an area that definitely requires change particularly in high priority areas around towns and cities.

#### **4. Regionalisation**

##### ***Q. 8. How might the woodland creation schemes be made more responsive to regional priorities?***

If different biodiversity and landscape objectives are substantiated in different regions, then it is important that these are reflected in differences in the relative support for different forms of woodland. Note should be taken of any supplementary planning guidance, landscape character assessments, and publications such as forest plans in the national, community and regional forestry initiatives. In addition closer links between rural development departments would be a benefit. Such links should be encouraged through the current Forestry Commission review of the options for decentralising handling of forestry policy and management.

#### **5. Advice, Partnerships and Extension Services**

##### ***Q. 9. Should the government place greater emphasis on supporting partnerships as a mechanism to promote woodland creation (and management) and provide information, advice, training and other support for woodland owners, agents and contractors.***

Expert advice can be obtained from a range of organisations such as forestry contractors in the private sector, FWAG and Wildlife Trusts in the charitable sector, community forests and local authority countryside services in the public sector. In general, the provision of woodland creation advice should be integrated with that of other ERDP schemes. The danger of not integrating is that advice and training may become or remain biased by its origins.

##### ***Q. 10. Is current awareness and understanding of WGS/FWPS adequate?***

No. The implications of the WGS and FWPS for agroforestry systems could be made clearer.

##### ***Q. 11. Is current advice provision and dissemination of best practice sufficient? If not how should this be improved?***

No comment.

##### ***Q. 12. Is there adequate provision of accessible training for those wanting to participate in woodland creation?***

Generally no. A level of competence in woodland management should be required of each successful applicant either shown by evidence of previous formal training or by compulsory attendance at relevant training courses. The cost of training related to agri-environment management e.g. fees, should be refunded. The England Rural Development Programme Vocational Training Scheme should be the main vehicle for this.

## **6. Relationship between WGS/FWPS and other Government Schemes and Incentives**

***Q. 13. Should WGS/FWPS become part of a single integrated agri-environment/land management measure or should we seek greater co-ordination and complementarity between the agri-environment and other land use measures?***

If the WGS/FWPS became an option within a single England Rural Development Programme scheme, we hope that there could be support for a wider range of tree-management systems.

***Q. 14. How could the WGS and the FWPS be better co-ordinated with other incentive schemes outside the ERDP framework?***

The inclusion of parameters such as matching with BAPs and Objective 1 areas etc on the application form, is a useful start.

***Q. 15. How should the WGS be used more effectively to support economic development, urban renaissance and brown field regeneration objectives?***

No comment.

***Q. 16. How may the WGS be enhanced to persuade mineral and landfill operators to choose woodland as the after-use option?***

No comment.

***Q. 17. Should land which is being converted to woodland as a planning condition, be eligible under the WGS?***

No comment.

***Q. 18. Should woodland creation grants be conditional upon appropriate stewardship of existing woodlands on the holding? Is so, why and how?***

No. However new applicants should receive training in woodland management (See question 12).

***Q. 19. Should Government take further steps to ensure that newly created woodlands are managed over a longer period to deliver the expected public benefits?***

Yes. This is particularly appropriate in silvopastoral and silvoarable systems, where the farmer currently receives a low initial planting grant (due to the reduced density of trees), but where the annual management costs are often higher (in terms of pruning to produce high value timber, tree protection, and weed control). We suggest that there could be a new agroforestry option, perhaps within the WGS Annual Management Grant (or an agri-environment scheme), to encompass the additional costs of managing agroforestry systems. Such management grants would provide social (employment), economic (high value timber) and environmental benefits (distinct habitat).

## **SECTION B: OPERATIONAL AND ADMINISTRATIVE ISSUES ASSOCIATED WITH EXISTING WOODLAND GRANT SCHEME AND FARM WOODLAND PREMIUM SCHEME**

### ***Q. 20. What should be the guiding principles in designing and managing schemes to provide government support for woodland creation?***

The schemes should be designed to result in quantifiable social (e.g. recreation, rural employment and improved animal welfare), economic (e.g. production of quality timber and tree products), or environmental benefits (e.g. flood prevention, biodiversity, landscape, reduced nitrate leaching, reduced soil erosion and carbon sequestration).

We encourage the use of modern electronic technology in management of the schemes in tandem with conventional paper methods for landowners without Internet access.

### ***Q. 21. Is the range and level of WGS payments appropriate? If not, how should they be changed?***

The WGS payments seem broadly appropriate. However we would support additional payments to cover increased costs of tree protection in 1) areas where deer damage is a particular problem, and 2) in silvopastoral systems (see answer to question 7).

### ***Q. 22. Should the government continue to use mechanisms to target WGS to meet high priorities such as tender schemes, challenge schemes, locational premia, Better Land Contribution and Community Woodland Contribution?***

Yes. We support mechanisms, which have identified benefits; for example the Community Woodland Contribution ensures a public social benefit for recreation.

We propose that there could be an agroforestry option, perhaps within the WGS annual management grant, which would cover the additional management costs associated with silvopastoral and silvoarable systems, which lead to social (employment of trained and qualified pruning contractors), economic (high value timber) and environmental benefits (distinct habitat).

### ***Q. 23. Should the Government continue to apply grant banding where there is a differential in the rate of WGS payments for broadleaf woodlands dependent upon the area of woodland created?***

Yes. This seems helpful to encourage participation by farmers with small holdings of land.

### ***Q. 24. Is the phasing of WGS grant payments appropriate?***

This seems OK.

### ***Q. 25. Are FWPS grant rates appropriate?***

Yes. However it is vital that the rates indicated when a farmer initiates a project are, at least, maintained for the duration of the project.

***Q. 26. Should there continue to be different FWPS payment rates according to the different categories of land?***

Yes. The FWPS implements article 31(1) of Council Regulation (EC) No 1257/1999, which provides for payment of an annual premium per hectare to cover loss of income resulting from the afforestation of agricultural land. It is therefore appropriate to have different rates for different land types.

In systems, such as silvoarable and clump-planted silvopastoral agroforestry, which result in the loss of income from the area planted with trees, FWPS should be payable on the same area claimed within the WGS (see answer to question 28).

***Q. 27. Should there be different FWPS payment rates, or different durations of payments, for predominantly conifer plantations and for predominantly broadleaf plantations?***

Yes, to the extent that broadleaf trees can provide, for example, greater biodiversity and landscape benefits than coniferous trees.

## **9. Scheme Rules**

***Q. 28. Should provision be made support of agroforestry (e.g. allowing the commercial cultivation of crops or grazing of livestock within woodland being created with WGS/FWPS grant aid).***

Yes. We argue that there should be two steps to facilitate this.

*1. Regulations which actively discourage agroforestry should be removed.*

In silvoarable and clump-planted silvopastoral systems, the current practice is to divide the field into a 'uncropped tree' area and a 'cropped' or 'pasture' area. The WGS payments (and associated Better Land Supplements and Community Woodland Contributions) for the 'uncropped tree area' are usually based on a reduced pro-rata basis of 1100 trees per hectare. The remaining 'cropped area' within a silvoarable system usually remains eligible for arable area payments, and the 'pasture' area in a clump-planted silvopastoral system may be eligible for forage area payments. However there are two regulations which can actively discourage growers from planting such agroforestry systems.

*1.1* At present the UK government does not recognise that the 'uncropped tree area' should be eligible for FWPS compensation payments. By contrast in France, the circular "Circulaire DERF/SDF/C2001-3020, DEPSE/C2001-7034 du 8 Août 2001 – PCPR", allows farmers who plant trees in an agroforestry system to get compensatory payments for the uncropped area below the trees (see its page 11). There seems no reason why the 'uncropped tree area' could not also be eligible for FWPS in England.

*1.2* In silvoarable systems, where the alley width is less than 20 m (an example would be where an alley is 14 m wide to accommodate 12-m-wide spray and spreader booms), it should be clear that the cropped area between the trees can be still placed into set-aside. In 2001, the minimum width for set-aside area was specified as 20 m (MAFF, 2001).

2 *Options within the WGS to promote the creation of diverse agroforestry habitats (environmental benefit) and high value timber (economic benefit) should be introduced.*

The creative and imaginative use of the land, integrating woodland and agriculture, should be encouraged. Agroforestry systems have been shown to offer social, economic and environmental benefits. The production of tree crops of high economic value (e.g. walnut, high-pruned timber) provide direct opportunities for rural employment. Biodiversity benefits have been measured in terms of airborne arthropods (Stamps and Linit, 1998; Peng et al., 1993), ground-living arthropods (Dennis et al., 1996), small mammals (Wright, 1994) and birds (Agnew and Sibbald, 1996). Wood pasture has also been identified as a priority in Habitat Action Plans. In parts of East Anglia, with light soils, belts of trees can reduce soil erosion. Silvopastoral systems can also offer benefits to animal welfare.

2.1 In order to produce high quality tree products in a silvopastoral system it is necessary to provide adequate tree protection. We propose that the costs of increased tree protection (to prevent deer damage or livestock damage within silvopastoral systems) could be included as an additional payment within the WGS planting grant (See question 7).

2.2 The WGS planting grants for agroforestry are usually less than those for traditional woodland systems because of the reduced tree density. However the annual management costs are usually higher. We propose that there should be an agroforestry option within the WGS annual management grant (or an agri-environment scheme) to cover those aspects of the management of agroforestry systems that provide social, economic and environmental benefits.

In 2001, the French government introduced an agri-environmental measure “Mesure No 2201 et 2202 Creation (2201) et Gestion (2202) d’Habitats Agroforestiers, AEM National Francaise Agroforesterie Validée” that provides an incentive for farmers who manage agroforestry systems. The payments compensate farmers for the additional costs due to the trees. It was officially approved by the STAR Committee of the EU on Wednesday 21 November 2001. The measure is valid for both silvoarable and silvopastoral systems. Our understanding is that there is an additional five-year payment to cover the costs of forming an agroforestry habitat. They have specified that there must be at least 50 trees ha<sup>-1</sup>. The payment is equivalent to €240 ha<sup>-1</sup> yr<sup>-1</sup> for trees with crops, €240 ha<sup>-1</sup> yr<sup>-1</sup> for trees with sheep, and €362 ha<sup>-1</sup> yr<sup>-1</sup> for trees with cattle.

***Q. 29. How could the WGS/FWPS be refined or developed to assist the delivery of BAP targets?***

As part of the assessment of each WGS application, the administrator should ascertain that the planting will not result in environmental damage. This should ensure that there is no loss of ecologically important grassland or other areas of high conservation value.

In addition, one of the priority habitat groups under the Habitat Action Plan is wood pasture and parkland. In France, new agri-environment measures have recently been introduced to support the creation and formation of such agroforestry habitats (see question 28).

***Q. 30. Should better provision be made for the support of woodland creation by natural colonisation?***

No comment.

***Q. 31. Should there continue to be an upper limit on the size of single applications under the FWPS?***

Yes. The support of an upper limit means that limited funds are allocated to a larger number of people.

***Q. 32. Should the cumulative limit be dropped altogether?***

No comment.

***Q. 33. Are the present 1 hectare minimum for FWPS applications and the 0.25 hectare working minimum for WGS woodland creation applications still appropriate?***

No. A silvoarable system covering one hectare with poplar at a 14 m spacing, which would result in a one hectare poplar stand after about 10 years, would only have a calculated WGS area of 0.14 ha and would currently be ineligible for WGS and FWPS payments. A one hectare silvopastoral system of ash with 400 trees per hectare would have a calculated WGS area of 0.36 ha. For agroforestry systems, we recommend that a lower limit of 0.1 ha should apply.

***Q. 34. How could the woodland creation grants be modified to encourage the provision of more public access to woodlands?***

The Community Woodland Contribution appears to be an appropriate model for a supplementary payment for new woods providing access when they are in close proximity to towns and cities. Such a payment could be conditional on demonstrable public access when woods are not in close proximity to towns and cities e.g. by links to existing footpaths, bridleways and roads.

***Q. 35. Should public access be made a condition of grant for woodland creation?***

No. It is best administered as an option. There will be sites where the environmental benefit of woodland planting alone will justify government support.

***Q. 36. Should the eligibility rules for the FWPS be changed?***

One condition of the Farm Woodland Premium Scheme is that a high percentage of the applicant's income must be derived from an agricultural business. There are now people, in some cases, buying quite large blocks of land, sometimes of former arable land. They could be excluded from the Farm Woodland Premium Scheme for that reason. They are often well placed to plant new woodland and are frequently open to new ideas such as agroforestry. Therefore we suggest that there should be a relaxation of the definition of 'running a farm business' to that of 'owning and managing land'.

***Q. 37. Are there any other rules that, if changed, could improve uptake and delivery of the existing schemes? If so, please describe and explain how they might be improved.***

No comment.

## 10. Scheme Administration.

***Q. 38. From your perspective are there any problems associated with WGS/FWPS scheme administration? If so, how could these be reduced or rectified?***

The experience of our members in putting together woodland grant applications, is that the applications and planting are often rushed in order to meet government deadlines. The possibility to submit schemes and defer planting would be helpful. The scoring sheet WGS2a has alleviated some of these problems with fast tracking of high scoring applications in some regions; it could be formalised and promoted more widely.

### ***Questions 39-43***

No comments.

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