

Wildlife and Countryside Link's submission to the Independent Panel on Forestry's *Call for Views*, July 2011

Wildlife and Countryside Link (Link) brings together over 35 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 690,000 hectares of land.

This consultation response is supported by the following 14 organisations:

- Bat Conservation Trust
- British Mountaineering Council
- Butterfly Conservation
- Campaign for National Parks
- Hawk and Owl Trust
- Friends of the Earth England
- Open Spaces Society
- Plantlife
- Ramblers
- Royal Society for the Protection of Birds
- The Grasslands Trust
- The Mammal Society
- The Wildlife Trusts
- Woodland Trust

Question 1 – What do forests and woods mean to you?

Wildlife and Countryside Link (Link) has had a long and distinguished role in the development of forestry policy in England. In the 1980s, Link focused on the devastating environmental impacts of a tax regime that encouraged conifer afforestation, most notoriously on the environmentally sensitive Flow Country in Scotland. Later, in its 1992 report *Future Forestry*, Link set out a vision for a new forestry strategy for Great Britain based on a balanced environmental, social and economic agenda.

Link's opposition to the proposed privatisation of the Forestry Commission's estate in 1993 helped to bring into focus the wider public benefits of the national forest estate for public access and wildlife. Its campaign for a national strategy based on delivering public benefits rather than solely timber production led to the UK Forestry Accord in 1996 and the England Forestry Strategy in 1998, which rejected the idea of single purpose plantations once and for all. Link was one of only two NGOs represented on the Working Group for the wide ranging Study of the Public Forest Estate whose report was completed in 2010.

Today, as ever, Link's members and their collective supporter base share a passion for the beauty, tranquillity and unique biological richness of England's woods, forests and their associated open habitats.

Question 2 – What is your vision for the future of England's forests and woods?

Link believes that England's trees and woodland¹ have a vital role to play as part of a coherent ecological network and a source of optimism and well-being. Their role includes the protection and enhancement of biodiversity, public access, the historic environment and landscape conservation. Link members are united around their common desire to see enhanced woodland and open habitat

¹ We define 'woodland' to include native woods, plantation forests, wood-pasture and parkland.

biodiversity, greater public access to woods and a larger, more sustainable and resilient woodland resource.

Question 5 – What do you see as the priorities and challenges for policy about England’s forests and woods?

The challenge for the Government, on advice of its Independent Panel on Forestry, is to truly integrate the delivery of multiple public benefits – biodiversity, access, historic environment and landscape conservation – into the creation and delivery of forestry policy. This needs to be a policy for all of England’s trees and woodland, on public and private land, including the management of the Public Forest Estate.

Link considers the following to be priorities for English forestry policy and its effective delivery:

1. Protection and restoration of the native woodland resource

Retaining and protecting all native woodland with semi-natural characteristics is vital. Without this basic resource, regardless of how it is managed, woodland species will decline. Restoration of native woodland on ancient woodland sites currently covered with plantation forests (‘PAWS’²) is the only way to increase the extent of ancient semi-natural woodland. The English Public Forest Estate, managed by Forestry Commission England, is a key PAWS resource that requires a strategic and concerted approach to restoration, delivering the objectives of the Government’s native woodland policy *Keepers of Time*.³ Restoration of non-native conifer PAWS should be achieved by restructuring and removal of the conifer crop at an ecologically appropriate scale and speed – with restoration of natural woodland remnant features (native tree cover, deadwood, ground flora and archaeology) which are often put at major risk by planting – to allow the regeneration of the semi-natural component.⁴

The importance and cultural significance of woodland cover of all types to the quality of landscapes should be recognised through spatial planning policy, alongside other important semi-natural habitats. In particular, recognition should be granted to ancient woods, PAWS, woodlands supporting very localised priority species⁵ and assemblages of veteran trees. It is important that landscape scale action for woodland expansion takes account of the priority non-woodland habitats and species present – not just woodland habitats and species, or theoretical ‘focal species’ – and the need to enhance the condition of existing priority native woodlands and designated sites, as well as expanding native woodland cover.

What the Government needs to do:

- Provide new and strengthened forms of protection for all ancient and semi-natural woodland sites, particularly through the new planning framework.
- Commit to restore all 35,000 hectares of planted ancient woods in their ownership or management, and facilitate restoration off the Public Forest Estate.
- Improve the biological condition of the UK Biodiversity Action Plan priority native woodland habitats, associated priority species and designated sites.
- Ensure that historic environment features and designated sites within all woodlands are in good condition.

2. Open habitat restoration

Forestry has a critical role to play in meeting Government aspirations for non-woodland habitats, such as semi-natural grassland and lowland heathland. Inappropriate afforestation has had a direct adverse impact and continues to damage neighbouring non-woodland habitats through habitat loss, fragmentation, tree invasion and changes to soil conditions, drainage and water quality.

² ‘PAWS’ – plantations on ancient woodland sites.

³ Forestry Commission England (2005) *Keepers of Time – a statement of policy on England’s ancient and native woodland*. June 2005. Forestry Commission England, Cambridge.

⁴ Woodland Trust (2005) *The conservation and restoration of plantations on ancient woodland sites: a guide for woodland owners and managers*. Woodland Trust, Grantham.

⁵ Section 41 of the Natural Environment and Rural Communities Act 2006 identifies the species that are of principal importance for biodiversity conservation in England.

Government now has a policy for re-creating and restoring open habitats from conifer plantation,⁶ but current delivery is weak. This policy must be ambitiously delivered if Government is to meet its existing commitments to safeguard this asset and its associated biodiversity, amenity and cultural value for future generations.

The Forestry Commission England manages the largest area of un-restored lowland heathland under forestry. This damaged, but largely repairable biodiversity resource should be restored, which would enable the UK Government to meet most of its own target for the restoration of this habitat. If these areas of potential continue to be restocked with conifers, the conditions needed for re-creation could be lost forever.

The EU Habitats Directive requires Member States to maintain or restore the habitats and species of European importance listed in the Annexes to the Directive to "favourable conservation status". Of the six heath and scrub habitat types present in the UK, five are in Unfavourable-bad condition. All of the bog, mire, fen, grassland and freshwater habitat types present in the UK are in Unfavourable-bad condition (and three are deteriorating). The open habitats policy can also contribute to the restoration of three freshwater habitat types. The ambitious delivery of the open habitats policy should play a key part in meeting these commitments in the future.

What the Government needs to do:

- Agree an ambitious national target with Forestry Commission England and Natural England to deliver the open habitats policy both on and off the Public Forest Estate.
- Develop delivery mechanisms that overcome barriers to the implementation of the open habitats policy.

3. An increase in appropriate management of native woodland

There is strong evidence that a lack of woodland management, and the resulting decrease in structural diversity and loss of woodland features, is linked to the dramatic declines observed in many species of bird, plant, amphibian and insect. With evidence-based targeting, appropriate safeguards and the provision of management support and guidance, more woodland management could see increases in rare and threatened wildlife associated with native woods and open habitats.

Understanding the variation in objectives for woodland management is critical to biodiversity delivery. We acknowledge differing objectives of a multitude of public, voluntary sector and private woodland owners; the task of Government is to ensure that biodiversity objectives are embedded in national forestry policy and delivery mechanisms, such as English Woodland Grant Scheme (EWGS) and agri-environment schemes.

Link recognises the importance of economic activities, including the development of markets and supply chains, as well as grant support, to drive woodland management that could benefit priority species and habitats and other public goods. The critical test is that management interventions, e.g. to harvest woodfuel, are founded on principles of sustainable forest management and do not lead to a 'dash for cash' approach.

Different forms of management (from active intensive to minimum intervention) will be appropriate in different places, and important micro and mosaic habitats within woods (including ponds, lakes, streams, wetlands, rock faces and grasslands) must receive special consideration. Management regimes should also encompass the conservation of evidence of the woodland's history as well as earlier archaeological sites which may also be present within the woodland. The UK Forestry Standard and its associated guidelines is Government's minimum approach to sustainable forestry, but policy must go beyond this if Government are to truly realise the environmental and public benefits of trees, woods and forests in England.

What the Government needs to do:

- Ensure Government grants and advice target delivery for priority national and EU species, habitats and other public benefits, including those for which no markets currently exist.

⁶ Forestry Commission England (2010) *When to Convert Woods and Forests to Open Habitat in England: Government Policy*. Forestry Commission England, Bristol.

- Support the development of markets (e.g. for woodfuel and timber in buildings), products, harvesting, marketing and management planning capacity and expertise for native woodland management that provide public benefits. This should also help to integrate woodland management into existing land management businesses, and so drive sustainable woodland management that provides public benefits.
- Apply the UK's existing commitments to international sustainable forestry to all grant-aided and state woodland work, including work delivered through agri-environment schemes for woodfuel and via woodland planting, felling and management consented by the town and country planning system.
- Provide encouragement to owners to go beyond the UK Forestry Standard minimum to realise public benefits and Government's own biodiversity commitments.
- Encourage more owners and managers of small and/ or low-intensity managed native woods to become certified under the voluntary UK Woodland Assurance Standard (UKWAS). This is in line with Government's own commitments made at the 2002 World Summit on Sustainable Development, existing measures in EWGS for woodland survey and management planning, and measures to assist market access, help consumer confidence on sustainability, and connect with public sector environmental procurement initiatives.
- Ensure that Forestry Commission England continues to certify the English state forest against the UK Woodland Assurance Standard.

4. Sustainable woodland expansion

Appropriate woodland management, in combination with targeted expansion and buffering of what remains of the native and ancient woodland resource, is important in creating conditions for the survival of priority species and habitats, preventing damaging edge effects and providing new areas of suitable habitat for the future. Such action could also greatly enhance the potential for the public to appreciate and enjoy woodlands.

Link supports the principle of expanding woodland cover and the creation of new woodland habitat to benefit woodland wildlife, especially where ancient woodland can be buffered and extended to create more resilient woodland landscapes that are able to cope with climate change impacts. Link also supports the creation of new woods for people who have insufficient existing access to woodland, especially in urban areas where woods and trees perform vital regulatory functions. Any expansion must be undertaken using the principle "the right tree in the right place" to maximise benefits and avoid damage to biodiversity, landscape, water, archaeology and other public benefits including public access. Any expansion should be viewed at a landscape scale, in order to increase connectivity at the broadest scale. Mistakes of the past, such as planting on important open habitats, must not be repeated.

What the Government needs to do

- Provide the right mix of legislation, regulation, facilitation, advice and grant support to encourage a significant increase of the right trees in the right places, whilst preventing planting in the wrong places.

5. Maintaining and enhancing public access for leisure and recreation

The proven social and environmental benefits of access to our forests and woodlands are currently valued at £1.2 billion per annum, with recreational visits valued at £484 million per annum.⁷ Recreational opportunities should therefore be fully realised and public access should be increased. This should be done in an environmentally sustainable manner, by allowing the public to access and explore the area as freely as possible and offering opportunities for environmental education, interpretation and enjoyment of the natural environment, whilst at the same time avoiding disturbance to sensitive wildlife species and habitats and protecting historic features.

There must be a national objective of increasing access to all woodland. To help achieve this, those areas currently receiving Government grants or other public monies (via schemes such as the English

⁷ UK National Ecosystem Assessment (2011) *UK National Ecosystem Assessment*, UK NEA, Cambridge (<http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>).

Woodland Grant Scheme, Stewardship Schemes or through inclusion in the National Forest or other planting and restoration projects), should be dedicated as access land as a condition of the grant where access is not yet provided. The simple rule should be applied that if public money is used then the widest public benefit should be gained, and for woodlands this should include public access.

What the Government needs to do:

- Clarify the key role for woodlands and forests in delivering the aspirations and targets in the 2011 Natural Environment White Paper about reconnecting people with nature. Provide encouragement, advice and support, and help in removing barriers where private woodland owners want to improve woodland access.
- Ensure that public access is maintained and enhanced to all of our forest and woodland, with a national objective of increasing access to all woodland.
- Look to increase and protect access to woodland where there is currently no access provision, through a Countryside & Rights of Way Act 2000 dedication.

6. Support research and information gathering

It is important to understand the state of, and impacts on, England's native woodland resource. Research, survey and monitoring are needed to ensure that national and regional forestry policies, and those that impact woodlands, are properly informed. This will include information on the extent and condition of priority habitats, as well as afforested semi-natural habitats, and the permeability of neighbouring land. Knowledge of the history of the woodland and its continuity of management, from written sources, surveys and biological records, will assist in understanding its management needs and its landscape context.

Continued improvements in the knowledge of the causes of priority species declines, priority habitat changes and needs and dispersal abilities of key woodland species is vital to enable effective management of the existing resource and improved spatial targeting for woodland creation.

What the Government needs to do

- Monitor and report on the effectiveness of forestry policy in delivering Government priorities for the protection and enhancement of biodiversity, public access, the historic environment, landscape conservation and other ecosystem services.
- Continue to support research and solution testing into priority species declines, climate change adaptation and mitigation, tree diseases and ecosystem services delivery by woods and forests.

7. Public Forest Estate

Link believes that the Public Forest Estate is a vital national asset, providing highly valued access to and reconnection with nature for the public. Public ownership will continue to be an important element in the ownership mix for forests and woodlands, and the Public Forest Estate should be the exemplar for the delivery of all the public benefits outlined above.

Individual Link members have additional views, which will be expressed in their individual responses to this call for views.

**Wildlife and Countryside Link
July 2011**

