

ENVIRONMENT, FOOD AND RURAL AFFAIRS (EFRA) COMMITTEE INQUIRY INTO THE ROLE OF DEFRA IN SUPPORTING A THRIVING FOREST ECONOMY AND ENVIRONMENT

Submission from CPRE Gloucestershire

Introduction

1. CPRE Gloucestershire is a Branch of the Campaign to Protect Rural England, a national charity working nationally and locally to stand up for the countryside: to protect it from the threats it faces, and to shape its future for the better. Forests and woodlands are an important component of Gloucestershire's countryside, which includes the Forest of Dean. One of the largest areas of Public Forest Estate in England, with an origin probably the wildwood, the Forest of Dean has a rich history as an ancient royal forest and was the first National Forest Park in England.
2. CPRE Gloucestershire Branch welcomes this inquiry, which is now particularly timely with the decision to leave the European Union and the consequent need for the UK and the devolved administrations to develop new support frameworks for farming and land management as the Common Agricultural Policy will no longer be applicable. We are concerned, however, that the terms of reference for the inquiry make no reference to the future arrangements for the Public Forest Estate that were recommended by the Independent Panel on Forestry. We comment on this issue in our submission.
3. In this submission we concentrate on five issues:
 - i. Future arrangements for the Public Forest Estate
 - ii. Policy objectives for forestry and woodland management
 - iii. A support framework to deliver forestry and woodland management objectives
 - iv. Targets and a focus for woodland creation, and targets for woodland management
 - v. Pests and diseases

i. Future arrangements for the Public Forest Estate

4. Building upon our experience in Gloucestershire and in particular in the Forest of Dean, we comment on the future of the Public Forest Estate (PFE) where decisions are still awaited from Government in the light of the recommendations of the Independent Panel on Forestry (IPF) and the Secretary of State's January 2013 response.
5. In 2013 Defra published the Government Forestry and Woodlands Policy Statement. In the Ministerial Foreword, the Secretary of State stated that "England's Public Forest Estate will remain secured in public ownership – for the people who enjoy it, the businesses that depend on it and the wildlife that flourishes in it. We have rescinded the previous policy of disposing of 15% of the Estate and we will be providing sufficient funding in this Spending Review to ensure that high levels of public benefit can continue to be delivered." The Minister also pledged two other key things. The first was that "In the longer term, a new body will be created to hold the Estate in trust for the nation. The new body will have

greater independence from Government and greater freedom to manage its resources and maximise its income but with the right safeguards in place to operate for the long-term benefit of people, nature and the economy.” The second was a need for “a group of expert Guardians, including community representation, established to advise the new (PFE) body and hold it to account”.

6. We concur with all those pledges. However, the matter remains unfinished business urgently in need of resolution. Even in the Government Forestry and Woodlands Policy Statement there appears to be back-peddling. For example, although there is mention in Chapter 9 of “A group of expert Guardians, including community representation, established to advise the new body and hold it to account”, that seems to have been diluted in the Annex to “We are also exploring the scope for establishing a separate group of expert Guardians, including representatives from community groups, to advise on and support the delivery of the body’s remit.” Contrary to the IPF recommendations there is no mention of the Guardians being given statutory powers over land sales, or to what extent they will have a regulatory role and so be able to hold the new PFE Board or senior management to account, or even whether due cognisance must be paid to their advice. These differences are in no way clarified in the Forestry Commission’s interpretation of them issued later in 2013 under the title *Towards a New Public Forest Estate Management Body*. It seems to imply that the Guardians should be little more than a Site Stakeholder Group.

7. Notwithstanding the above, we do agree that the new PFE body should be given operational independence, and that, save for a requirement to report regularly to Parliament, Government should not play any direct role in its everyday affairs. We also agree with the assets in trust for the nation concept, and that there is need for an operating Charter with a firm commitment to the nation written into it. Over-arching, we consider that the Guardians key role should be to safeguard the Charter.

8. We note that primary legislation is needed to establish the proposed new organisational arrangements. We look to Defra Ministers to press for the allocation of the necessary time to put this legislation in place as soon as possible.

9. A contentious matter, until the Secretary of State rescinded it in the January 2013 Statement, was the policy of disposing of 15% of the PFE. It is our view that only in exceptional circumstances should PFE land be considered for disposal, particularly ancient forest or ancient “forest waste”. We are completely opposed to the concept of long term (*e.g.* 99 years) leasing of PFE land because, effectively, the practice would amount to privatisation by stealth.

10. The experience in the Forest of Dean of PFE land being sold or leased is that free public access has been lost or severely restricted and commercial development has caused loss of tranquillity, light pollution, habitat degradation and negative impact on the well-being of existing residents within the surrounding area. Should further land sales or long term leasing be allowed, the risk of these effects would increase dramatically, as would the risk of clear felling for the short term supply of wood for biofuel energy generation, site “development”, and/or replacement planting with inappropriate tree species.

11. Disposals, acquisitions or changes of use of PFE land should never detrimentally impact on environmental/public well-being or other public benefits. The process should involve local community consultation, and sales or acquisitions of PFE land (*e.g.* for new woodland creation) only agreed after being consented to by the Guardians under a duty to hold the new (PFE) body to account with the aim of maintaining the integrity of the Estate.

ii. Policy objectives for forestry and woodland management

12. In our submission to the Independent Panel on Forestry we set out our views on priorities for forests and woodlands. We consider that the priorities we advocated are still relevant and repeat them here. We said that we would wish to see:

- all ancient woodlands and heritage forests nationally designated and fully protected legally in perpetuity; and appropriately managed with the Forestry Commission a statutory consultee on all planning applications affecting ancient woodlands and heritage forests;
- access to forests and woodlands on foot and for cyclists and horse riders fully safeguarded and extended where appropriate;
- access to forests and woodlands encouraged for recreational, educational and health benefits;
- more rapid progress with removing inappropriate species from plantations on ancient woodland sites (PAWS restoration) both in the Public Forest Estate and on private land;
- Biodiversity Action Plan (BAP) targets and SSSI condition targets met comprehensively;
- management of woodland and open land within forests planned in a way that it contributes to delivering the objectives of the Lawton Report, *Making Space for Nature*;
- steady progress in the creation of new woodland where the public benefits would be greatest (see Issue 4 below);
- new or updated management strategies for the major heritage forests such as the New Forest and Forest of Dean, developed through a thorough participative process with stakeholders. Ownership of the heritage forests should remain with the Forestry Commission as the body best placed to deliver across the spectrum of objectives required for these special areas;
- development of markets for sustainably grown UK timber;
- public sector procurement policy to favour UK timber supplies, and public funding to support forestry industry awareness campaigns such as “Wood for Good”;
- the Public Forest Estate managed to the highest of standards, as an exemplar of best practice for all to follow;
- in the Forest of Dean and the New Forest, the continued honouring of ancient sufferances, and/or rights originally granted by royal privilege to persons living in or visiting the forests;
- exploitation of public sector partnerships: in particular, National Park Authorities and AONB Partnerships who are well placed to deliver forestry policy objectives;
- greater involvement of voluntary and community sector groups and

organisations in the management of the Forestry Commission's estate through local management agreements. This approach has worked well in the Forest of Dean for many years with agreements with the RSPB (the Nagshead Reserve) and with the Gloucestershire Wildlife Trust which manages a number of smaller nature reserves in the area;

- a campaign to address threats to woodland, and the ability to produce quality timber, from excessive and growing deer numbers, grey squirrels, and in the case of the Forest of Dean, wild boar; and an expanded research capacity within Forest Research to address growing threats from tree diseases and the impact of climate change (see Issue 5 below).

iii. A support framework to deliver forestry and woodland management objectives

13. Forestry and woodland management currently receives public funding through the Rural Development Programme for England (RDPE), under "Pillar 2" of the EU Common Agricultural Policy.

14. The RDPE funded support is mainly through Countryside Stewardship, with woodland one of the scheme's priority areas. Scored against local priority targets to maximise environmental benefit (Countryside Stewardship is a competitive scheme), grants have been provided to create new woodland, support the preparation of management plans, address tree health issues, and improve existing woodlands.

15. Three other schemes, also forming part of the RDPE, provide additional opportunities for the forestry sector: Countryside Productivity Scheme, Growth Programme, and LEADER. In each case via grants for projects that enhance the potential of woodland, they add value to forestry products and create jobs.

16. Collectively, these schemes are complicated to understand for applicants, and complicated and expensive to deliver for Government. Arguably, they are also significantly under-funded for the scale of desirable activity.

17. With the decision to leave the EU, a new system of support for land management (including forestry and woodland management) will need to be put in place as the CAP will no longer apply, nor will access to its two pillars of direct payments to landowners; *i.e.* Pillar 1 – Basic Payments Scheme - to provide income support; and Pillar 2 – Rural Development – to provide incentives to deliver environmental and other public benefits, and to encourage increased efficiency and productivity.

18. Post CAP, there is opportunity to design a new system that continues to support farming and land management but which puts securing wider public benefits and non-market benefits from land management at its heart, and is easier to understand and implement. Current budgets must be protected but should be refocussed to better deliver public benefits and non-market benefits from land management. The opportunity to secure significant reforms and improvements must be grasped.

19. For forestry and woodland, it is our view that the Forestry Commission has served the nation well, and remains the most appropriate organisation to manage future delivery of public support for this sector, but it will need to be adequately funded and staffed for the task if ambitious targets for woodland creation and for the management of existing woodland are to be achieved.

iv. Targets and a focus for woodland creation, and targets for woodland management

Woodland creation

20. From a low point at the end of World War 1, England's woodland cover has increased from around 5% to 10%, but England still remains one of the least forested countries in Europe.

21. Increasing the contribution that trees, woods and forests make to the quality of life and to delivering wider benefits such as climate change mitigation and flood alleviation, indicates a need for a further expansion in woodland cover and a focus on the creation of new woodland where the public benefits would be greatest.

22. There should be a continuing focus on woodland creation around major urban population centres, delivering environmental improvements and recreation opportunities, as well as being a catalyst for economic growth. The concepts behind, and the programmes of, the Community Forests and National Forest provide good models of what can be achieved. Green Infrastructure policies in local plans should also identify opportunities for woodland creation with funding provided through developer contributions, including the Community Infrastructure Levy (CIL).

23. A second priority should be to increase woodland cover in water catchments and floodplains as an important element in ameliorating downstream flooding. In addition to the potential benefits in flood control, such woodlands can provide a wide range of other benefits, including improvements to water quality, fisheries, nature conservation, recreation and the landscape.

24. Annual targets for woodland creation should be set, against which both quantitative and qualitative progress can be measured, for example through the National Forest Inventory.

Management of Existing woodlands

25. Much existing woodland in private sector ownership remains unmanaged or under-managed. Recommendation 11 of the Independent Panel on Forestry was that Government, in partnership with the forestry and land management sectors, should work to offer every woodland owner advice on multi-benefit woodland management, with a view to increasing from 50% to 80% the area of woodland with a UK Forestry Standard compliant management plan. This aim was endorsed in the Government's response to the Panel's report with the comment that shared action could bring around two-thirds of woodland into sustainable management by 2018.

26. We endorse the ambitious this target, and efforts to improve the economics of woodland management and produce more good quality timber, but it will require appropriate financial incentives to deliver. Progress towards the target should be made the subject of an annual report.

27. Further development of the woodfuel market could help incentivise woodland management, although care is needed to ensure that climate change mitigation benefits are not lost in transporting wood long distances. Encouraged through the Renewable Heat Incentive, we agree that more use of local woodfuel for heating can encourage better management of existing woodland with landscape and biodiversity benefits. So long as management is sensitive and there is no risk of loss of ancient woodland or a permanent reduction of afforested areas, greater use of wood fuel is supported.

28. We do however consider it questionable as to whether trees should be grown on a large scale solely for use as biofuel. Living trees are excellent sequesters of atmospheric carbon dioxide, but that benefit of reducing the gas's impact on climate change is lost when the trees are burnt; so it is always much better if felled trees are used for timber products such as building materials, fencing, pulp, and furniture, rather than biofuel.

v. Pests and diseases

29. An increasing number of tree species in the UK are under threat from a wide variety of tree diseases and pests and it is anticipated that the threats will increase with climate change. The implications of these threats could be severe and widespread and potentially highly damaging to the tree population in urban areas, woods and forests, with implications for our landscapes and biodiversity as well as for timber production.

30. Following publication in 2014 of *A Plant Biosecurity Strategy for Great Britain* setting out the Government's approach to plant biosecurity and preventing and/or excluding new pests and diseases, the *Tree Health Management Plan* published by Defra in 2014 was a welcome recognition of the urgent need to increase action to protect tree populations. As precautionary measures, only debarked timber should be imported and all young trees produced abroad and imported should spend at least one full growing season in a UK nursery where they can be carefully screened and monitored for pests and diseases before being transplanted into their final locations.

31. The range of threats is wide with some now well established, notably from *Phytophthora* species, Ash Die Back and the Oak processionary moth; and others are yet to emerge. We note that the *Tree Health Management Plan* states figures for the value of trees and woods. It quotes that "The total UK forestry and logging sector, including support services, directly employed around 14,000 people in 2010, in more than 3,000 separate enterprises. Based on data from the Office for National Statistics (ONS), Gross Value Added (GVA) data for this sector was around £400 million in 2011 and for sawmilling and planing was around £430 million in 2011. The total societal and environmental value of woodlands is several times higher than the commercial value of the forestry and logging sector. These societal benefits are estimated at around £1.8 billion per year (2012 prices) and it is recognised that there are further benefits that cannot readily be monetised."

32. Given the scale of the monetised value of woodlands and their further value that cannot be monetised, fully funding the necessary research and action to deal with these threats looks wholly justified, despite current constraints on public spending.

33. It is also important to remember that the threat to woodland does not only come from viruses, bacteria, microbes and fungi. A further issue is the need for increased research and intervention to contain deer numbers, grey squirrels and feral wild boar/pigs (an exponentially increasing pest in the Forest of Dean). Current populations of all these species make growing hardwood timber, particularly quality timber, increasingly difficult. As examples of what is needed, greater levels of public sector funding should be provided to support and expand the work of the Deer Initiative, and financial support for major programmes to control and significantly reduce grey squirrel and wild boar numbers is required.

CPRE Gloucestershire Branch
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