



**Independent Panel on Forestry's Call for Views¹ – response by the
Royal Society for the Protection of Birds² July 2011**

The RSPB welcomes the opportunity to respond to this initial consultation by the Independent Panel on Forestry for England. We look forward to subsequent dialogue on the Panel's detailed proposals.

England's woodland resource is a legacy of previous forestry policies, some of which encouraged the overplanting of important lowland heathland, blanket bog and semi-natural grassland habitats, as well as promoting the removal of, and damage to native woods. These earlier policies favoured timber production, rather than a range of public benefits such as wildlife, access or the protection of soil, water quality and the historic environment. Forestry policy, including state forest management, must address these 'legacy issues' by rectifying wildlife damage, in addition to any new priorities.

Sustainable multiple benefit forestry finally became a cornerstone of government policy for Great Britain in 1991³, restated in two subsequent forestry strategies for England⁴. This promise must finally be honoured in full. We note the time lag between issuing government forestry policy and tree growth and the development of woodland ecosystems. We have concerns about the effectiveness and uptake of policy delivery mechanisms to produce a range of public benefits in a sustainable manner.

The RSPB has been lobbying for improvements to forestry policy, legislation and practice for over 25 years. For example we sought the expansion of the Forestry Commission's statutory duties to include wildlife and campaigned to halt environmentally damaging new forestry - which was driven by tax incentives, insufficient regulation and unsustainable practice. We comment on forestry strategies, standards, state forest plans and woodland grant development; promote lowland heathland restoration and carry out research to understand declines in broadleaved woodland birds. We challenged the scope and operation of the forestry measures of the current Public Bodies Bill and critically examined the recent Public Forest Estate proposals. We also manage native woodland, restore lowland heathland and peat bogs, carry out casework and give advice on forest management.

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

The RSPB believes that England's trees, native woods, plantation forests, wood-pasture and parkland have a vital role to play in the protection and enhancement of biodiversity, the provision of environmentally sustainable public access, the conservation of landscape and the historic environment. They are an essential part of the environmental and social well-being of England.

Unfortunately England's native woodland is a fragmented resource, much of which needs more help to improve its environmental condition and to realise its potential for wildlife, such as native woodland habitats, associated priority species, e.g. birds, flowering plants, mosses, lichens and insects. As well as ancient semi-natural woodland, there are other semi-natural habitats, such as lowland heathland and peat bogs, that were covered with forestry plantations under earlier forestry policies that need restoration. Restorable areas of these open ground habitats continue to be replanted

¹ <http://www.defra.gov.uk/forestrypanel/files/forestrypanel-callforviews-110519.pdf>

² The RSPB is a registered charity: England and Wales no. 207076, Scotland no. SC037654. The RSPB speaks out for birds and wildlife, tackling the problems that threaten our environment. We have over a million members. We own and manage about 8,800 hectares of woodland in the UK, a quarter of which is in England. Our UK forestry-related work includes advocating changes to devolved country and local policies, providing advice on conservation management to woodland owners and managers, and undertaking research into birds and other biodiversity affected by forestry practices. A summary of our forestry policy work is at: <http://www.rspb.org.uk/ourwork/policy/forestry/> including responses to recent government consultations. Contact: Mike Wood, UK Forestry Policy Officer, RSPB, Ground Floor Miller Building, Lochside View, Edinburgh Park, Edinburgh, EH12 9DH; tel: 0131 317 4100; e-mail: mike.wood@rspb.org.uk.

³ Forestry Commission (1991) *Forestry Policy for Great Britain*. September 1991. Forestry Commission, Edinburgh.

⁴ *England Forestry Strategy* (1998): [http://www.forestry.gov.uk/pdf/fcefs.pdf/\\$FILE/fcefs.pdf](http://www.forestry.gov.uk/pdf/fcefs.pdf/$FILE/fcefs.pdf) & *England's Trees, Woods & Forests* (2007): <http://archive.defra.gov.uk/rural/documents/forestry/20070620-forestry.pdf>

with environmentally damaging forestry under current government policies, grants and regulation. Some forestry plantations can be improved to benefit wildlife, for example for black grouse.

There are historic environment sites and features that still require rehabilitation within woodland settings, to conserve their interest and promote appropriate environmental interpretation. There are also still areas of England's woodland that require enhancement of public access provision to allow people to enjoy the countryside for leisure and recreation in an environmentally sustainable manner.

England's 'forests and woods' mean a lot to the RSPB in terms of their environmental value and potential, but further work is needed by government to secure and enhance such public benefits.

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

Becoming better places for wildlife and people. The RSPB wants to see a more widespread improvement in the biodiversity condition of England's priority native woodland habitats and associated wildlife species, including woodland birds, as well as designated wildlife sites. We also have concerns about the insufficient level of restoration of lowland heathland, peatland habitats, native woodland and other semi-natural habitats from inappropriately located conifer plantations.

The National Ecosystem Assessment recognised that woodland can provide a range of benefits to the environment, society as well as the economy. Forestry policy, practice and regulation needs to reflect this, including in the management of the Public Forest Estate. Facilitating the delivery of public benefits, including biodiversity, from trees, native woods and non-woodland habitats as well as forestry plantations, is a key role for government, but this needs to be more effectively deployed.

The RSPB's vision for the future of England's forests and woods is:

- Biodiversity is protected and enhanced. This includes ensuring that the wildlife habitats and species of native woods, lowland heathland, peatbogs, semi-natural grassland and designated sites are all in good ecological condition. Also making forestry plantations better for wildlife.
- Access to woodlands for leisure, recreation and education is enhanced. This should promote enjoyment and understanding of the natural world and be carried out sustainably.
- Woodlands are appropriately located, designed and managed in a sustainable manner to produce a range of environmental, social and economic benefits from protecting and enhancing biodiversity, to access for leisure and recreation; from providing sustainable products, helping rural development and urban quality to saving woodland heritage. Restoring ancient woodlands and lowland heathland is a core part of this. Looking after existing native woodlands and their wildlife is important, this must not be neglected in the drive to plant new woodland.

Question 3 – What do you feel to be the benefits of forests and woods to:

a) you personally;

Native woodlands are important places for wildlife and people, some need restoration and management work to regain, protect or enhance their biodiversity quality.

b) society as a whole;

Native woodland, lowland heathland, peat bogs and other open ground habitats are critical natural capital. They can enhance the quality of people's lives and can contribute to rural and economic development, with native woods contributing to local energy security through biomass heating and restored peatland habitats assisting climate change mitigation as well as adaptation.

c) the natural environment;

England's native woods are priority habitats under the UK Biodiversity Action Plan (UK BAP) and the England Biodiversity Strategy. These native woods support a wide range of UKBAP and EU priority species, from birds to insects, flowering plants, mosses and lichens.

There are areas of recent non-native conifer plantations that mask the wildlife potential of important restorable semi-natural habitats, such as lowland heathland and ancient woodland. It is vital that these important habitats are restored and managed to help wildlife, e.g. nightjars and woodlark.

d) the economy?

We note that the recent National Ecosystem Assessment showed that when the value of ecosystem services is taken into account, and not just monetized market values, a policy mix that emphasizes environmental awareness and ecological sustainability results in significant economic gains compared to one that emphasizes national self-sufficiency and a narrow focus on economic growth.

Native woodlands can provide economic as well as social and environmental benefits. Appropriate native woodland management is important for improving biodiversity, protecting historic environment and enhancing access, all of which can connect with rural and economic development.

There is a challenge of engaging with owners and managers of so-called 'under-managed' native woods to encourage and facilitate positive management for wildlife. This could also generate important rural development, economic and social benefits, such as employment, assisting energy security through establishing local biomass supply, and supporting access and leisure infrastructure.

Question 4 – We would like to hear about your suggestions of practical solutions and good practice which can be replicated more widely.

There is a need to encourage and facilitate more widespread positive management of native woodlands to improve the quality of priority habitats and populations of priority species. This could be done via harvesting and marketing co-ops, using techniques and machinery appropriate for native woods, training for woodland survey, skills development for management planning, woodland survey and monitoring as well as appropriate harvesting, extraction, processing and marketing of wood and timber products. There could also be support for certification of small/low intensity managed woodlands to the UK Woodland Assurance Standard (UKWAS) to assist market access, generate consumer confidence on sustainability, and to promote positive management approaches.

Government has an important facilitation role in bringing native woodlands into good condition to meet its own biodiversity commitments; and not just through woodland grants and state forestry, but by other mechanisms too. There is scope for government to innovate in this area, for example by finding ways to enable co-operative woodland management planning and group certification, and fostering collaborative approaches to harvesting, extraction and marketing of products.

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, historic environment, access and landscape conservation - into forestry policy and ensure their effective delivery. This needs to be for all of England's trees and woodland, on state, public and private land.

The 2007 English forestry strategy – withdrawn by the current administration - encompassed laudable environmental policy objectives, but without effective mechanisms to achieve them in practice at a large enough scale, or of sufficient quality or in a targeted manner. The government's strategies for ancient and native woodland⁵ and open habitats⁶ have failed to deliver. There is still about 50,000ha of un-restored ancient woodland in England (70% on the Public Forest Estate), while 55,000ha of lowland heathland remains scarred with conifer plantations, 55% of this is state forestry.

Neither agricultural and forestry grants for woodland planting or management, state forestry or the market has fully met the challenges within the government's own biodiversity targets for woodland and non-woodland habitats and species. Public benefits, particularly non-market benefits such as biodiversity, have yet to be fully realised on England's public, state or privately owned woodland.

A high proportion of native woodland - the most valuable woodland resource for wildlife and other public benefits - is currently not being accessed by government's policy delivery mechanisms. Only

⁵ Forestry Commission England (2005) *Keepers in Time – a statement of policy on England's ancient and native woodland*. June 2005. Forestry Commission England, Cambridge. [http://www.forestry.gov.uk/pdf/anw-policy.pdf/\\$FILE/anw-policy.pdf](http://www.forestry.gov.uk/pdf/anw-policy.pdf/$FILE/anw-policy.pdf)

⁶ Forestry Commission England (2010) *When to Convert Woods and Forests to Open Habitat in England: Government Policy*. March 2010. Forestry Commission England, Bristol. [http://www.forestry.gov.uk/pdf/eng-oh-policy-march2010.pdf/\\$FILE/eng-oh-policy-march2010.pdf](http://www.forestry.gov.uk/pdf/eng-oh-policy-march2010.pdf/$FILE/eng-oh-policy-march2010.pdf)

about a third of England's woodland is native woodland, the majority of which is privately owned. Many of these native woods are small, isolated fragments, in need of remedial work and onward management to protect and enhance their biodiversity value. Such woods may be termed 'under-managed' and may have been so for a long time, perhaps for a range economic and other reasons.

Much of England's native woodland is not in receipt of existing grants for positive woodland management that could help enhance their value for wildlife and other public benefits. Such woodland is also seldom certified against the voluntary UK Woodland Assurance Standard, and if not in receipt of grant or felling licence will not be engaged with the Forestry Commission, or required to meet the Government's mandatory UK Forestry Standard.

18% of England's woodland is managed by Forestry Commission England. The extent of this Public Forest Estate dates mostly from earlier more limited forestry policy objectives, and is not the optimal mix of woodland types, quality or location to fully deliver public benefits. Despite attempts since the 1990s to restructure state forests and partially modify management practices, with a strong emphasis on landscape and recreation with some good quality but limited biodiversity works, there is still more that could and should be done to make the Public Forest Estate fully deliver public benefits.

The RSPB remains concerned about how the UK Government's biodiversity commitments and targets are embedded and translated into forest management on the Public Forest Estate. The RSPB considers that the Public Forest Estate's objectives, funding model and resultant land management does not work best for wildlife or other public benefits, and is therefore unsustainable. The Public Forest Estate's status quo is not an option for England's wildlife to thrive.

How the Public Forest Estate is managed is more important than who owns it. The RSPB does not accept that the provision of a smooth supply of softwood for processing is sufficient an argument for limited delivery of multi-purpose forestry policy objectives on the Public Forest Estate, or that non-native conifer plantations are the only, or optimum way to produce high quality public benefits.

The funding model of the Public Forest Estate may need further examination. For example the current Treasury capital charge on state forest land may impede positive works for public benefits, while the traditional Forestry Commission approach of aspiring to fund all their activities from timber receipts may also have perverse biodiversity impacts. The state must ensure that the Public Forest Estate produces high quality public benefits, and encourage private woodland owners to do so too.

It is important that management of the Public Forest Estate protects and enhances biodiversity, whether this is under direct or indirect state ownership. Currently the Public Forest Estate is not eligible for land management grants under the Rural Development Plan – if this were to change, for example by setting up an 'arms-length' body still controlled by government, then the woodland grants budget would need to be increased to encompass this large new area of eligible land.

The priorities for English forestry policy should be:

1. The sustainable management of all woodlands to provide enhanced public benefits. There is more scope to enhance the wildlife, access, landscape and historic environment value of a range of woodland types, including by the restructuring of non-native conifer plantations. There could be economic and social, as well as environmental benefits to doing this.
2. The protection and enhancement of the biodiversity of existing native woods and associated priority wildlife species and designated sites.
3. The restoration of priority semi-natural habitats from inappropriate plantation forestry to benefit these habitats and the priority wildlife species that depend on them. This includes more widespread restoration of ancient semi-natural woodland sites, lowland heathland, peatland habitats, semi-natural grassland and sites for breeding wading birds.
4. The appropriate expansion of woodland that protects, not harms, important biodiversity. Opportunities should be sought to buffer and expand priority native woodland habitats. The restoration of native woods on ancient woodland sites ('PAWS'⁷) should be a key task.

⁷ 'PAWS' – plantations on ancient woodland sites.