

Shropshire Hills AONB

Response to Defra consultation – *England's trees, woods and forests*

Q1 Do you agree with these principles and objectives of Government intervention in trees, woods and forests? If not, what principles and objectives should guide Government intervention?

Yes, we do agree with these principles and objectives, however it should be appreciated that whilst biodiversity and amenity are important, woodlands are fundamentally a strategic timber resource which will require management, particularly with the anticipated growth in demand for locally-sourced biofuel.

Q2 Do any regulations present a barrier to the sustainable management of trees, woods and forests and associated businesses and activities? If so, what changes should be made?

The criteria for enabling Tree Preservation Orders needs to be amended to help secure the protection of veteran trees, whether hollow or sound. The lack of protection for hollow veteran trees or partly dead veteran trees, on the premise that they may be deemed unsafe, is working against the principle of sustainable management.

Q3 Could we use public procurement policies more effectively to encourage the sustainable management of our existing woodlands without breaching Single Market rules or the need to obtain best value?

Yes, we should use public procurement policies to encourage sustainable management of existing woodlands. These policies should reflect environmental and social benefit not just the cheapest supplier. Developers being required to source a minimum level of home grown material that meets sustainability criteria would have a significant effect down the supply chain

Q4 Do these seven types of intervention adequately express Government's role in supporting trees, woods and forests?

Yes, particularly with respect to iii, iv, vi and vii

Q5 Do you think we have got the balance right between the way national priorities will be expressed in the new Strategy and the scope for regional delivery to respond to local needs and opportunities?

Yes, as long as the detail in RFFs is not overlooked.

Q6 Do you agree that creating new woodland solely for the purpose of carbon sequestration is not a national priority for forestry policy in England?

No. New woodland planting should reflect and enhance landscape quality rather than being primarily for the purpose of creating a carbon sink. Any carbon sequestration benefits gained should be regarded as a bonus.

Q7 If you disagree, what evidence is there that creating new carbon sinks should be a national priority for forestry policy in England, rather than an additional benefit of planting woodland for other reasons?

This requires a full grasp of the scientific aspects of climate change.

Q8 Does the timber industry have adequate opportunities to promote English timber as an environmentally friendly substitute for other materials? If not, what are the barriers?

English hardwood is perceived to be a niche product, which is often difficult to source, more expensive and of lower quality than uniformly grown timber from overseas.

Certified timber from overseas is labelled as 'sustainable' and often purchased in preference to indigenous timber. There is a need to improve awareness of the benefits of utilising local timber over that of imported (see also response in Q3).

Q9 If we are to achieve the substitution of woodfuel and timber for less sustainable fuels and products:

i) what, if any, are the barriers to progress?

Woodfuel - There is a reluctance to install woodfuel solutions if others are doing so. Despite grant incentives, initial costs are high. This is compounded by uncertainty of supply and quality of material to act as further disincentives.

Locally manufactured wood pellets are presently difficult to obtain. Most are imported, negating any environmental benefits.

Woodfuel is bulky, so storage is often a problem that makes it unsuitable for domestic use (thus closing out a major outlet).

Timber – There is a need to promote, innovative design to utilise local timber, there is an opportunity to exploit the more contemporary/esoteric markets which could add significant value to the product, particularly if there is a good story to tell (links with landscape, history etc.).

ii) what areas of activity e.g. skills, co-operatives may need attention?

Where appropriate, Planners and Architects to design in woodfuel technology on new developments (Particularly storage facilities).

See Q9 i

Q10 As owners respond to new markets for woodland products, will the existing regulatory framework offer adequate protection against possible adverse impacts (on woodlands and the wider environment) of large-scale reintroduction of management in existing woodlands or of new planting? Will it do so without creating unnecessary barriers for woodland owners and managers competing in these markets?

The current framework should offer all protection woodland needs. Public misunderstanding of what is happening to woodlands may be a greater problem. Consistent public education starting at school will be essential if this policy does not cause a political (due to public pressure) ill informed backlash. We need to ensure that

woodland owners have the requisite skills to manage them. There is a clear role for management plans to guide the future management of woodlands.

Q11 Do you agree that it is a national priority to understand how we must adapt our woodland management to ensure that woodland can continue to deliver the full range of benefits in a sustainable way as the climate of England changes?

Yes. Woodland management must be adapted to reflect an altered climate.

Q12 Do you agree that it is a national priority to understand how we can use tree and woodland cover most effectively to manage water resources, protect soils and buffer against air pollution?

Yes, but an element of public education is required.

This should be a priority, but non-indigenous tree diseases brought about by the global movement of plant material and climate change increasingly threaten woodland cover. The potential to kill large numbers of trees should not be underestimated e.g. A healthy alder population is vital to maintain the quality of watercourses; however large-scale losses brought about by *Phytophthora* are significant.

Q13 How and where could other Government policies contribute to delivering our biodiversity aims for trees and woodland?

By ensuring that local authorities procure wood products from local woodlands.

Q14 How can Government best support its delivery partners in achieving these aims?

Put measures in place to ensure that BAP and other targets are met.

Q15 Do you agree that restoring open habitats by carefully targeted deforestation should be a national priority where this makes a significant contribution to the Government's biodiversity policies and to UK BAP targets?

This should be a regional rather than national priority.

Q16 How and where could other Government policies contribute to delivering our landscape aims for trees and woodland?

Landscape assessment should be applied where proposals to plant Short Rotation Coppice are made.

Q17 How can Government best support its delivery partners in achieving these aims?

Forest Enterprise distorts the market for timber sales for the private sector. Government can support delivery partners by equalising the market

Q18 Do you agree that:

- promoting public access to woodland should remain a national priority and
- improving public access to woodland is a matter for regional and local decision makers to consider where there is unsatisfied demand?

Improving public access is more important than promoting public access. Only appropriate public access should be encouraged. Some woods should not be open to public access for a variety of reasons – sensitive biodiversity, clash of interests – shooting v walkers. This should be an issue dealt with on a local level.

Q19 How should existing mechanisms to deliver public access be modified or, if new mechanisms are needed, what might they be?

No comment.

Q20 What could be done to improve social inclusion in woodland access and recreation?

Take every opportunity to educate and change perceptions. Forest Schools are a very effective means of engaging with children. It is desirable to demonstrate the amenity of woodlands to adults. This can be done through guided walks and talks.

Q21 Do you agree that provision of high quality facilities for public recreation in publicly and privately owned woodland is a national priority?

This could defeat the object of Q6. Provision of high quality facilities should not encourage car use. If facilities are provided, they should be minimal.

Q22 Do you agree that it should be a national priority to promote the role of trees and woods within a network of green infrastructure in and around our towns and cities?

Yes, but also support and protect existing trees and woodland.

Q23 Do existing policies, mechanisms and resources adequately support planting and management of trees and woodlands as part of a green infrastructure? If not, what changes are needed?

No. There is a lack of co-ordination between utility providers. The penalties for damaging trees are derisory. There is insufficient or no enforcement. and a lack of qualified arborists in the planning departments of local authorities.

Q24 How could woodlands within a new green infrastructure contribute more to other priorities, for example a growing network of non-motorised transport routes in and around towns and cities?

They should act as links between urban and peri-urban woods. The benefits to wildlife would be a bonus. A green infrastructure would be beneficial to wildlife.

Q25 How can we develop the potential of trees and woods to deliver educational and other social benefits and help to create sustainable communities? What can we learn from our own experience or that in other countries?

Draw the public's attention to the historical background of woodlands. Explain to the public why woods are a resource that need to be managed, as they have done for millennia. Woods are a strategic resource that should not be wasted. Forest Schools have proved their worth and should be extended elsewhere. Communities should be

encouraged to take an active role in the care and management of their local woodland. Education is a critical tool in developing sustainable communities.

Q26 Do local authorities have access to the expertise, resources and technical support they need to manage our urban tree stock?

Local authority budgets are fickle and subject to political influence. Tree maintenance is not a vote winner. Not all local authorities have a tree officer. Highways departments tend to be over-cautious with respect to Health and Safety concerns.

Q27 Do current regulations and guidance on policy and practice offer adequate protection for scheduled and unscheduled archaeological sites and other historic or cultural heritage sites:

i) in existing woodland; and/or

ii) where woods are being planted or allowed to develop through natural colonisation?

Generally the regulations and guidance on policy and practice with regard to Scheduled Ancient Monuments is good. Unscheduled archaeological sites may be at risk of damage unless they are recorded on a local authority Historic Environment Record (HER). Planting schemes which are undertaken under the Woodland Grant Scheme are only permitted after archaeological advice has been received. Regrettably damage to archaeological features can occur owing to lack of survey prior to planting operations. Many woodlands are also archaeological sites; they are living history. They may contain archaeological sites such as settlements and field boundaries over which secondary woodland has developed, or they may contain archaeological features that have been created through past woodland management activity. Typical examples include charcoal hearths, sawpits, trackways, buildings, quarries, kilns and water management features.

Q28 Do you agree that Government support for capacity building, innovation and other supply-chain initiatives can contribute significantly to the profitability of woodland management?

Yes. Identify low-cost management solutions, particularly for smaller, economically marginal woodlands. The economic potential of such woodlands may be better realised by developing allied skills (particularly marketing, business and product design). However, this approach will only work if the public are able to buy in to this, to drive the market. (Unless you are in the know, where do you go to buy local wood products? Many will continue to go to the out of town DIY sheds, ignorant of the options).

Q29 What are the priorities for capacity building and innovation?

Innovation in the use of wood is needed. In recent years unsustainable materials such as plastics have been substituted for sustainable raw materials (wood). Paintbrush handles are a good example of this. We need to take a close look at what can be fabricated from wood before we automatically opt for a fossil-fuel derived raw material.

Q30 Do you agree that all government support for sustainable woodland planting and management should be based on delivering the environmental, social and

other public benefits of sustainable forest management, including the production of renewable energy and the economic regeneration of lagging rural areas?

No. Renewable energy should not be the sole objective of woodland planting. Localised, low volume timber production should be the primary objective of woodlands with environmental, social and public benefits as a valuable by-product. Woodland needs to be managed as much as a strategic resource of fuel and raw materials as a social resource. It is sensible for us to hand on a viable forestry estate to future generations. Managing woodlands for timber invariably delivers the desired amenity as a by-product.

Q31 Do you agree that:

i) there should be no net loss in the total area of native woodland in England?

Yes.

ii) there should be a significant increase in the proportion of woodlands that are managed sustainably?

Yes.

iii) there should not be a national target for woodland expansion?

Yes, but minimal regional targets should be set.

Q32 If not, what should the targets be, should they be split down to regional level (or finer), and how would you justify them?

Targets should be set at a regional level. The lack of targets should not result in the absence of woodland management.