Call for Views Response to the Independent Panel on Forestry



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

It is in woodland that I see best an expression of our wild nature, a rare place where farming is not the dominating factor that it is in most of our landscape, and where instead natural forces hold sway. It is where the interactions between those natural forces and of native plants, animals and insects are so much more readily observed than in a farmed landscape. Farmed land has little three-dimensional structure, and is driven solely by the need to provide grazing or bare ground for crops, but woodland is the place where I can get away from farming, and especially away from livestock and their dung that pervades almost everywhere else. Outside of a personal enjoyment, I recognise the importance of ancient and native woodland lies in the resilience it offers to our native species in the face of external threats from agriculture, pollution, development and climate change, through acting as a reservoir which maintains these species and from which they can spread and be renewed into our landscapes. In addition, natural woodland edges often have a species diversity that is supportive for non-woodland species.

I therefore take great exception that trees themselves are not truly regarded as wildlife, and are disposable as an inconvenience to everyone, including the conservation industry, or are habitually managed because of some notion of tradition –a case in point is hornbeam (*Carpinus betulus*) where I doubt many appreciate the fluting nature of the growth of its trunk since it is invariably lost to coppicing. Thus things happen to trees, under them, around them, in them, and they are used as product - the yearly growth capacity must be used, we are told in various policy documents - but there is little or no intrinsic natural value attached to them. No interest in that trees form dynamic communities and have lives longer than humans.

I also take great exception to the often repeated assertion that woodlands in neglect of human management are "incapable.......of delivering the full benefits we want for people, places, wildlife and the environment". The mantra as always is that human management enhances biodiversity and habitat quality and, as usual, there is no attempt to defend or even explain this assertion (and see 3c). Worse still, measures to monitor trends in characteristic woodland wildlife and habitats will rely on such assessments as the "proportion of woodland Sites of Special Scientific Interest (SSSIs) in favourable condition". The prescribed management criteria set for the SSSI - and thus in effect a measure of our intervention - will be the standard, even for non-designated woodland.

Richard Mabey is opposed to the idea argued by many in the conservation industry that all woods must be managed. They should be without intervention – non-intervention. To him, management is as arrogant and outrageous as suggesting that all wild animals should be in zoos. As he writes in his book Beechcombing (2007):

"Managed woods reflect too simplistically our own limited skills and horizons. Wild, unmanaged trees show us possibilities beyond our cultural tunnel-vision"

Most of the conservation industry is not an enthusiast for woodland species. If it were, there would be Species Action Plans for two of the native woodland lilies that I have growing in my garden: there is only probably one true native location for May Iily (*Maianthemum bifolium*), and that is at the edge of a plantation in the Public Forest Estate (PFE) in N. Yorks; and there are only nine sites known for whorled Solomon's-seal (*Polygonatum verticilatum*) all of those localised in the Tay River catchment in Perthshire. These woodland wildflowers don't attract the interest of the conservation industry as chopping down trees, or coppicing them, or grazing the life out of landscapes, which is what is required for most of the UKBAP

species, are the reasons why these lilies have becomes so scarce. These are commonplace plants in the native woodland of continental Europe. As Roger Deakin wrote in Wildwood (2007) we have "carelessly lost more of our woods than any other country in Europe"

There is an immense drive for woodlands in the UK to be managed, something which is anathema in national protected areas across Europe, and is in distinction to woodland managed for production. The arguments given for management are the received wisdom of prejudice that seems to inform all manifestations of dogma. Thus Natural England wrap up both "biodiversity" and woodfuel in a dreadful policy document that sees only the straight trees of plantations (Natural England's Draft Position on Trees and Woodlands, NEB PU18 04, November 2009):

"A step change is needed in the amount of active management of woodland, particularly of ancient woodland, to maintain and enhance this resource..... The under management of our native woodlands has left us with large volumes of low grade and low value timber with little market outlet"

I see this blanket "management" approach as a threat to woodland interior and its ground flora. It is hard to see how the more immobile species of ancient woodland, such as toothwort (*Lathrea squamaria*) could resist this onslaught.

Question 2 – What is your vision for the future of England's forests and woods? See answers to Question 3b, c, d, and 4, 5

Question 3 – What do you feel to be the benefits of forests and woods to: a) you personally; See Ouestion 1.

b) society as a whole;

30.4% of woodland is publicly owned in England, of which 21.8% is in the PFE, 5.9% is owned by local authorities and 2.6% by other public bodies. This level of public woodland ownership is lower than across continental Europe - an astonishing 89.7% of forest across continental Europe is state-owned, and the woodland cover is higher in continental Europe at 45% compared to the 8.7% of England. However, that level of ownership still indicates that the public should not be indifferent to the potentialities of that publicly owned woodland in realising the will of society in England.

The Forestry Commission (FC) as the steward of the largest area of that public ownership has shown itself to be aware of the need for more and better communication than in the past, and through its commitment to sustainable forest management and its community consultation on Forest Design Plans, is much more aware of public benefits and public interest. In publishing recently a guide on the Principles of Public Engagement, and the toolbox for public engagement in forest and woodland planning, the FC is showing itself to be increasingly competent to broker environmental decisions, in communication with local and national stakeholders, and so to establish what is most likely to be in the public interest.

The public realm is another facet where the will of society has a remit. Treescapes in urban areas have a mixed history of support from local authorities, and from shops and traders. Main shopping chains call for street trees to be removed from the public realm in commercial centres so that customers are not soiled by droppings from birds. Local authorities have in the last decade used imaginative shrub and tree plantings in public squares, alongside urban roads and on carriageway medians, only to remove them when they are perceived to become traps for wind-blown litter.

The resilience of human life in urban landscapes, not least in its spiritual and psychological health, is nurtured in the spaces in between the clamorous activities that compete for our attention. The respite of a pocket park; or some soft landscaping with shrubs and trees, provide the visual stimuli that modifies our

perception of location and, removed from hard edges, we can often filter out the noises that would drag us back to an urban reality. We should strive to embellish our urban locations with living things, working through the utilitarian difficulties, and knowing that a restoration of proximity to natural processes can fulfil an important restorative human need.

Society can also benefit from woodland approaches outside of public ownership. The National Forest is a regeneration project, located across a central band of the English Midlands that is generally recognised to have low wildlife value. The aim of the regeneration is to ratchet up woodland coverage to 33%, a level seen in few areas of England (one is Waverly in the SE). It started out ten years ago at a low base of 6% woodland cover, has reached 17% and should reach its target in the coming years. At that coverage, the landscape acts ecologically as functional woodland, but are we preparing ourselves for our existence in this new landscape? Can we have the mindshift to give value to that woodland, not using it as a dumping ground or other illicit activity such as trail bikes? Will we welcome rather than persecute the increase in woodland fauna that will find a home in it? Will we still harvest this new woodland as an industrial process for so many cords of timber, or will we redevelop, or develop new, natural and humanscale approaches to management and uses for woodland products? Will we leave some of that woodland alone, shaped only by natural phenomena and which is our gift to wild nature?

c) the natural environment

We must retain ancient woodlands for their reserve of wild nature, giving recognition to forests more broadly as providing ecological resources. There is thus a need for widespread education to re-integrate woodland into the common psyche. Countries in continental Europe, with their considerably higher woodland cover, are much more explicit about their woodland heritage. Hence this from the biodiversity strategy of Belarus (2002):

"Forests are a national wealth of Belarus and one of the major natural resources of the republic. Over one third of the territory is covered with forests. Native flora of Belarus includes 28 tree species, 42 shrub species, and more than 820 herbaceous species. Forest phytocoenoses are represented by 203 types and 1178 associations. In the republic, forests are in the focus of environment protection. Among other natural complexes they have the best capability of stabilizing and balancing natural processes. Therefore, forest provides a basis or a natural framework for human survival and preservation with the provision of care of forests, improvement of their state and natural potential"

It has to be asked why it is so uncommon in England to be able to observe the long-term dynamics of natural woodland when it was so clear in Biodiversity: the UKBAP (1994) about the importance of woodland to the ecology of England. It noted that the natural climax vegetation (the plant communities which would develop and be present in the absence of human intervention) over much of the UK is broadleaved forest, dominated by trees such as oak, ash and small-leaved lime. That because the natural land cover of the UK is principally woodland, we have inherited more woodland species than for any other kind of habitat. That the structural complexity of woodland creates a great variety of niches, which are exploited by up to two to three hundred vascular plants and perhaps over 5,000 animals (mostly invertebrates). And that the clearance of perhaps 90% of the UK's forest cover during the past 5,000 years has been detrimental to many species dependent upon forest conditions. These include many plants and invertebrates, with significant extinctions of beetles associated with ancient trees and dead wood. It noted that lowland broadleaved woodlands had a richer mammal fauna than today, with lynx, bear, wolf, and beaver before these mammals were depleted and then exterminated by human activities.

We have an obligation under the EU Habitats Directive to consider re-instating species lost due to human action so that we begin to "complete the community" of our post-glacial natural reserve. Amongst these are beaver, their reinstatement currently being trialled in Scotland; wild boar; lynx; and with growing interest in wolf. At present, our predominantly cultural landscapes offer little real hope that re-introductions of such lost species would be successful or acceptable. There is a lack of sufficient type and

scale of suitable habitat within which these mammals would be able to exhibit their normal behaviour, and without our need to manage or control them. A successful reinstatement of these lost species would be aided by a strategy for England's trees, woods and forests that set in motion the attainment of that suitable habitat.

DEFRA carried out a consultation on England's Forestry Strategy in 2006. Amongst the background information contained in the Review of Evidence for the Formulation of Forestry Policy in England, there was an excellent summation of recent publications and discussion about how existing semi-natural woodland given a new, a lighter management regime (inherited natural) - and new woodland creation with a similar non-intervention (future natural) - could contribute wilder woodland landscapes where natural ecological processes regain greater importance (see Section 5.3.3 Minimum-intervention forests and new wild woods).

As noted in the review, large 'wildwood' landscapes are currently lacking in England. To be effective each wildwood would have to cover thousands of hectares to allow natural dynamic processes to dominate and to provide sufficient range for viable populations of large-territory wildlife species. These new wildwoods are core forest areas, whose effectiveness can be further enhanced by linking together by wildlife corridors, or Forest Habitat Networks (see also answer to Q4), so that forest-based species can move from one site to another. The aim of at least 30% tree cover in these corridors means that the landscape begins to function as if it were a single forest unit, but allowing these networks to be developed alongside other land uses.

I agree with the conclusion in that Review, and commend it to this consultation, that the scope for large-scale recreation of 'wildwood' landscapes that are dominated by natural processes should be investigated for their contribution to returning natural processes to the ecology of England, to their potential for reinstatement of lost species due to human causes under the EU Habitats Directive, and the findings acted upon.

d) the economy

Where is the encouragement for Continuous Forest Cover management of commercial woodland, recognised in a Parliamentary Office for Science and Technology briefing note as being under-developed in England (see Box 3, Postnote 275, 2007)? The briefing note recognises such systems can produce a more diverse forest structure and may be less costly to restock. While the latter is fiscally attractive, the greater diversity and the comparatively less forest disruption than clear fell, has important positive implications for forest wildlife.

Productive forests can also accommodate areas of greater naturalness. There are areas of minimum intervention in the PFE that are one step back from non-intervention, and which are areas where the FC does not intervene except on safety grounds, or for prevention of disease. This is classified by the FC under the Ministerial Conference on the Protection of Forests in Europe (MCPFE) Class 1.2, and there are 13,011ha in England's PFE (Scotland has 22,457ha and Wales has 2,415ha). The England total includes grazed woodland in the New Forest. Taking that out reduces the total for England to 4,019ha. My guess is that apart from a few research woodlands, the bulk of this minimum intervention woodland is areas of native woodland within or at the edge of plantation woodland where this management approach is best for that element. Thus in the FC's Hurn Forest in Dorset, so ably supported by the Parish Council and the people of Hurn, the wet native woodland is shown in the Forest Design Plan as being "sustained by minimum intervention".

The Read report - Combating Climate Change: A Role for UK Forests (2009) - had an interesting take on forest management alternatives (FMA) defined by the general management objectives and a corresponding intensity of forest resource manipulation. In that sense, it represents a spectrum or continuum, very much in the same that way that wildland can be regarded in the IUCN system of classification of protected areas. Five FMA were identified in Europe that follow in increasing order of biomass production:

- Unmanaged forest nature reserve (FMA 1):
- Close-to-nature forestry (FMA 2);
- Combined objective forestry (FMA 3);
- Intensive even-aged forestry (FMA 4);
- Wood biomass production (FMA 5).

The relationship between management approach and naturalness, biomass production, and carbon content indicates a range of benefits that can be achieved through spatial integration of areas of differing FMA in Forest Design Plans. In general, the higher the carbon stock, the lower will be the rate of sequestration and vice versa. Thus carbon content is highest in an unmanaged forest nature reserve where natural processes and disturbances create natural, functioning ecosystems.

Recent forest policies in the UK have created a shift in the balance of FMAs away from the dominance of intensive even-aged forestry, based on single species stands towards a greater representation of combined objective and close-to-nature forestry regimes. This diversification of species and stand structures is likely to increase the resilience of the forests to climate change. There will be a trade-off with a decline in the rate of carbon sequestration, but this systems view of forest management is by far the best way to secure a range of public benefits into the future. It gives purpose to "multiple use" forestry

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

The Postnote on Ecological Networks (No. 300, 2008) made the bold assertion that *"Ecological networks have already been defined for England"*. If this is so, then it is a remarkably adaptive definition that is fulfilled more by default than by national design, the latest incarnation based on agri-environment schemes and the BAP being in the Natural Environment White Paper, The natural choice: securing the value of nature (DEFRA 2011). In consideration of the woodland antecedence of the UK, Forest Habitat Networks (FHN) have been mapped for Scotland and Wales under the auspices of Forest Research, but have yet to make much of an impact on modelling or implementing ecological networking in England other than in a study by Peterken, the originator of the FHN concept, for Native Woodland Development in the North York Moors and Howardian Hills (FC and others 2006).

There is however an exemplar FHN initiative in the PFE that needs greater profile, and be considered for the potential of rolling out elsewhere on the PFE. Hardknott Forest, at the top end of the Duddon Valley in the Lake District, is an FC plantation of 600ha dating from the 1930s, in which many areas are reaching the end of rotation. Clear felling of sections has occurred annually since the late 1990's and the intent is to allow natural regeneration from the remnant stands of native woodland within the plantation. It will not be replanted with conifers. In addition, the FC has planted up 40ha of open fell to the south of the plantation with patches of juniper, oak, holly, hawthorn and birch, and there are stands of natural regeneration. This is Grassguards Native Woodland and it links in Hardknott Forest to the ancient woodland below Wallowbarrow Crags, and thus into the band of 22 ancient woodland sites that follow the course of the Duddon River 12km or so down to Duddon Bridge. In future years, this will be a remarkable example of interlinked native woodland rising from sea level up to just below Hardknott Pass at 400m – an irresistible prospect. Hardknott Forest will eventually be an upland wild woodland, an aspiration shared in many upland visions for England.

It is essential that Hardknott Forest and Grassguards Native Woodland are not lost to public ownership or the ecological coherence and connectivity that they will confer is very likely to be put at risk through other imperatives on the land. This is the case for Threestoneburn Forest in Northumberland. Lilburn Estates bought the 712ha of Threestoneburn Forest from the FC in 2007. As it had done with its prior purchase in 1999 of Wooler Common/Commonburn Forestry Plantation from the FC, the Lilburn Estate wishes to clear fell Threestoneburn Forest and convert it to grouse moorland, reducing considerably the very low woodland cover in the immediate area. The application to deforest to open habitat, putting at risk a red

squirrel population, nesting goshawks, and much other wild nature, is still being considered by the FC after further impact reports have been requested under the Environmental Impact Assessment process..

Ten years before selling Threestoneburn Forest, the FC had put forward a Forest Design Plan that sought to reduce the visual impact on the landscape as well as look to the future of the wild nature that undoubtedly associates with the forest. It would have been a gradual restructuring and transformation, with the sharp edges of the plantation reduced, a bar on replanting on the upper slopes and around rock outcrops, a widening of riparian zones and their planting with broadleaves, and clearing some open space on the northern boundary for Black grouse habitat. However, the Northumberland National Park Authority rejected that Forest Design Plan, and instead demanded a plan with a clear cut and no replanting, so that the whole site would be deforested to moorland. In effect, the NNPA blighted Threestoneburn Forest, as they probably also did Wooler Common/Commonburn Forestry Plantation such that, in the absence of any other remit for this publicly owned land, they became a liability for the FC. The publicly owned Threestoneburn Forest should not have been sold, as the forest transformed could have been the forerunner for our public land delivering on an agenda for recreation, education and spiritual renewal on a large scale - of an upland wild woodland (see 3c) linked to the route of a number of long-distance circular walks in the National Park.

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

In terms of challenges, you will hear a lot about restoration of PAWS to native broadleaves, and also about heathland restoration from plantations through deforestation to open habitat. A commitment to restoration of PAWS on the PFE was made in the FC's Keepers of Time: A statement of policy for England's Ancient and Native Woodland (2005). All the *actors* in restoration of PAWS are limited by funding sources. However, Yorkshire Water is able to raise a levy on its customers through approval of the Asset Management Plan submitted to OFFWAT, to restore a total of 75ha in their plantations starting this year. On the other hand, the FC applied to the North York Moors National Park Authority for £76,000 in 2008 for a native woodland development project at Boltby Southwoods. As was explained in a paper for the meeting of the Authority, the FC has to fund large scale uneconomic work within its own business plan commitments across the District and, in some cases, work of this kind cannot be progressed at all without additional funding.

It is generally agreed that PAWS restoration is best carried out carefully, with phased thinning and felling that does not put at risk the native species interest of the site. This will inevitably take time. If there is impatience at the rate of restoration, then it may be due to that considered pace of activity, but it may also be related to availability of funding. The FC passes out funding for PAWS restoration through the EWGS, but which it cannot give to itself. It should be a priority to fully fund the FC to restore PAWS on the PFE.

As the continuing public discontent that I document shows (see Heathland Madness – the juggernaut of nature conservation, Self-willed land) land-based charities carry on with a dogmatic policy of creating lowland heath habitat according to a supposedly repeatable recipe whenever the opportunity arises, and whatever local people think. These charities, rich in lottery and public funding, respond to the aspirations of their membership and have no need to consider the public interest. It would seem inappropriate to consider transfer of land ownership of elements of the PFE to these charities when it is unlikely that the public will would be well served.

An absolute priority is to increase the planting, use of and access to woodlands for wild nature and public amenity. It must form part of our national policy process for woodland that we undertake research that combines spatial (land characteristic, climate, current and future capacity, and vegetation cover and use) with economic considerations (market conditions, future subsidy regimes, food and forest product security, and the value of public goods from ecological services) in a foresight program of opportunity mapping that looks at a range of outcomes for the future of our expanding woodland landscapes. Through this process,

with data modelling at local, regional and combing to national level, it must be possible to determine what could be a headline overall woodland coverage co-existing alongside an effective area of agricultural land that meets national objectives. Action planning could then be on a woodland coverage related to local and regional capacity for realistic woodland expansion to an optimum.

As to the existing woodland resource in the PFE, I was one of the 2,239 respondents to a public consultation on the PFE in England that was carried out in 2009. As many respondents appreciated, the PFE is more than just land with trees on, and at 2% represents a significant public resource that should fulfil the public will. It would seem that the Government appears to have disregarded the outcome of that consultation, and the report of the working group. It is essential that the panel reflect on the reports from that consultation when considering the PFE.

Part of my response to that consultation was included in a collection of illustrative quotations, and I reproduce it here (What respondents had to say - The long-term role of the Public Forest Estate in England: consultation Part 3, FC 2009):

"The proportion of publicly owned land in England is very low by comparison with countries around the world that have successful and highly regarded protected area programs that provide a range of recreational opportunities as well as refuge for wildlife i.e. Canada, America, Australia, New Zealand, S. Africa etc. As the public body with the largest amount of publicly owned land, the FC are in a position to argue the case for developing a new and comprehensive protected area system in England, with the multiple uses and multiple benefits that it would bring, and especially providing an experience of wild nature that is rarely available in England now. An aim must also be to create the "ancient woodlands" of the future in England, increasing our woodland cover from the low end in Europe that it is at the moment"

Since that consultation response, my work in producing a report for the Scottish Government - Review of Status and Conservation of Wild Land in Europe (Wildland Research Institute 2010) – leads me to believe that I should also have added the protected area programs of continental Europe. I would point to the amendment of the Forestry Act 1967 in the Wildlife and Countryside (Amendment) Act 1985, that gave the Forestry Commissioners a role in the "conservation of flora, fauna and geological or physiographical features of special interest" as being the background to the potential of an increasing role of the PFE in delivering that national system.

As with many national protected area system agencies across Europe and elsewhere, the Forestry Commission must be fully funded in this role, without a dependence on sales of softwood or of forests. An analogy for this particular use of the PFE would be the public provision of art galleries, museums and urban parkland open spaces. An art gallery is a repository of excellence in the creative arts which the public can observe and admire but which remains intact and in place. A wildwood is a repository of the excellence of wild nature that we can observe and seek inspiration from, but from which we take nothing away except our enjoyment.

An example of the advantage that public ownership confers was illustrated for me at an EU presidency Conference in Brussels last November on restoration of large wild areas. I had a fascinating conversation with Bill Murphy, a manager with Coillte, the state-owned forest enterprise company in Ireland that owns over 445,000 hectares of land, about 7% of the land cover of Ireland. Coillte has a role in outdoor recreation, and Bill sees an opportunity in linking Nephin, one of their (publicly owned) forest areas with the adjacent (publicly owned) Ballycroy National Park, and with an area of (publicly owned) Bord Na Móna land (Irelands peat Board) which is spent bogland in need of reclamation. This will fulfil a vision of a large area of wilder landscape that people can enjoy walking in, camping out on trail walks, and experiencing a thrill of being immersed in nature that is gone from the overwhelmingly farmed landscapes in England, and its hard to see it happen here when we don't have a significant public ownership that could make it a reality. Selling off the PFE pretty much closes the door on that option.

Dr Mark Fisher, Self-willed Land, July 2011