



Forestry Commission England

## **The long-term role of the Public Forest Estate in England: consultation**

### **Part 3**

What respondents had to say - a collection of illustrative quotations

**December 2009**

## **Part 3. What respondents had to say. A collection of illustrative quotations**

This is part 3 of a three part report on the responses to a public consultation on the long-term role of the Public Forest Estate in England. Part 1, a summary of findings, and part 2, a detailed report, are available at <http://www.forestry.gov.uk/england-estatestudy-evidence>.

### **Question 2(a)**

*We agree with the analysis set out in the Consultation Document. The most pressing trends will be from an increasing domestic population who will have enhanced expectations of quality of management of the PFE. Equally valid, though perhaps not obvious at day-to-day operational level, will be the challenges arising from climate change and the switch towards a low-carbon economy. There will be expectations that the PFE should provide more renewable energy, floodplain management and peri-urban greening. Forest managers will have to deal with increased pest and fire risk, but may benefit from a more robust and diverse market for UK timber and wood products. An increasingly urbanised population risks being remote from the PFE, and one challenge must be to increase engagement with urban populations both to help deliver public benefits such as health and leisure, but also to ensure that the PFE remains valued in public policy terms. **North West England Regional Advisory Committee***

*The public forest estate is not immune to world economic factors and will find it difficult to find adequate finance to achieve its aims and objectives. Balancing the needs of the commercial timber sector who will provide finance with the demands of non profit making stakeholders will be challenging. **M J Charltons & Sons Ltd***

*The public forest estate has been very successful in delivering increasing levels of public benefits over the years. It must remain relevant to future shifts in the public policy agenda and be able to demonstrate that it is delivering public benefits and ecosystem services at the highest level. The relationship with the private sector will remain an important one. A key role of the public forest estate is in demonstrating best practice and innovation in delivering public benefits alongside commercial wood production across its estate as a whole. **Natural England***

*The emphasis on ecosystem services gives the Forest Estate the challenge of identifying which services can be delivered across the large and small sites making up the public estate, requiring identification of conflicts, prioritization, best fit analysis and gap analysis. **Principal Forestry Officer***

---

Members noted that the urban rural divide continues to cause challenges in relation to issues such as access to services, understanding and relevance, and developing effective community engagement. The position of the PFE currently gives rise to a rural focus and whilst members support the development of community woodlands (e.g. South Yorkshire) the challenge is to deliver sustainable woodland management on these sites whilst recognising the increased management costs associated with urban areas and in delivering effective community engagement. Social and Population trends are likely to increase the pressures on the PFE, especially in those parts closer to urban areas. This relates to demand from both population growth and increased leisure time combined with higher public expectations as to how people can use woodlands. **Yorkshire and The Humber Regional Advisory Committee**

Awareness amongst government & private sector leaders and economists, and the value of woodlands to society as a broad environmental service provider is continually failing to be understood by the decision makers who hold national funding. Increasing activity by the PFE in social and purely environmental agendas is almost always pure expenditure with no income. This is already recognised internationally by countries such as New Zealand. Private sector woodlands cannot match the outputs provided by the national forest estate, and neither do many owners wish to do so as it limits their personal objectives for land management. The net cost to the treasury of the PFE is inconsequential in DEFRA and national terms. This consultation must result in the remaking of FC England. **Individual**

Recent rapidly increasing prices for agricultural land (for a range of reasons) make it more difficult for forestry to compete, particularly in the lowlands. **Individual**

Many of our woodlands are now isolated in the landscape and we need to consider how these may be incorporated into a wider landscape mosaic. **Dormouse Officer, Peoples Trust for Endangered Species**

## **Question 2(b)**

A specific contribution that the public forest estate can make is in supporting the emerging woodfuel industry in its early stages where confidence over supply will be a critical factor. In the longer term, the market opportunities lie more with the private sector in bringing neglected woodland back into management. The skills and expertise of the public forest estate would then be used to support wider public policy goals through re-establishing a culture of woodland management generally. **Natural England**

Few other organisations have the scale of landholding to be able to demonstrate the potential for biodiversity benefits that this approach can provide. There are opportunities for the PFE to play a greater role in promoting sustainable forest management to the public. **North York Moors National Park**

---

*Firstly, the Public Forest Estate, both through direct action and by acting as an exemplar of good practice, has a major contribution to make in numerous different ways to Climate Change adaptation and mitigation. These ways include moving towards a low carbon economy, adapting woodland ecosystems and contributing to habitat connectivity, carbon sequestration, flood management, and exploiting opportunities to grow UK tourism in a more favourable climate. Secondly, woodlands - existing and new - have a major place in the provision of green infrastructure which is increasingly recognized as an essential component in urban expansion. The Public Forest Estate has been leading the way in this area, for example through the previous successful Community Forests programme. The concept of ecosystem services is relevant. Government policy development on the delivery of ecosystem services may lead to new funding mechanisms to deliver public benefits. **The National Association for AONBs***

*Increasing public recognition of the enduring value of the forest environment and its importance in combating Climate Change and negative effects of urbanisation on human health and well-being. Coupled with a move to a low-carbon economy, there is an opportunity for the PFE to be an exemplar of productivity, coupled with delivery of public services. **North West England Regional Advisory Committee***

*The trend for reduction in conifer plantation and expansion of native broadleaved woodland and non-woodland - demonstrated from the mid 80s on page 15 and as proposed in current FDPs on page 16, is minimalist compared to what is needed to meet this opportunity. The change needs to be dramatically developed. The provision of non-woodland or open habitat can have additional benefit for public recreation and appreciation when linked to the opening up of wide and attractive vistas and the inclusion of archaeological and historic features within their appropriate settings. Another vital trend which offers opportunities is that to achieve sustainable management through co-operation with adjoining and other interested land managers. This trend is already apparent in, for example, south-east Dorset, and could be extended, with great benefit, there and elsewhere. **Dr Haskins, Dorset***

*There may also be potential socio-economic benefits of ecosystem services associated with biodiversity conservation – this does not remove the need for targeted work for priority biodiversity. Forestry Commission England is a government delivery body. The state forest was set up to deliver government policy objectives. These objectives have changed over time and management of the estate needs to change with them. **RSPB***

*A trend in the future is likely to be the better appreciation of the range of services provided by forests with better allowance made of services not costed in the past (but which nevertheless can have huge economic consequences). Traditionally “income” from forests has been thought of as sales from timber production. Increasingly, however, “income” will come to include economic, environmental and societal benefits from, for example, flood alleviation, erosion protection, pollution absorption, carbon sequestration, health provision and so on. In future a forest that only produces a traditional forest crop, is unlikely to be economically viable. **The Wildlife Trust***

*FC needs to proactively expand its present small scale policy (as described on page 24 of the consultation) of relocation close to urban centres. This relocation policy is particularly pertinent where there is a desire to deflect undue pressure from areas of greater sensitivity, e.g. lowland heaths. Make its holdings more diverse, and hence more attractive to the public. **Dr Haskins, Dorset***

## **Question 5**

*I hope that the net cost is low, or that the estate is a net contributor (better than self financing) but whatever the truth I believe it is important that the estate strives to maintain public access, to increase domestic timber diversity and production, to maximise the use of derelict land (such as quite large areas alongside some railway lines) (recognising that not all such areas will be suitable for public access), and to contribute as much as possible to reducing the dependence on fossil fuels. **Individual***

*Individually and collectively, the members of the RAC are convinced that the public benefits arising from the PFE are irreplaceable by any other form of green infrastructure. We note the Consultation document's figure of £300m annually for non-market public benefits; arising from an estate with a market freehold value of £500m; an enviable rate of return. We also draw attention to a study by EcoTec (2008) for the Natural Economy Northwest group which demonstrates there are 11 economic benefits of green infrastructure; all of which the PFE delivers. In this context, the net cost of running the PFE can only be regarded as extremely low, and should be regarded as an investment. Further we note Table 3 in the Consultation Document, which highlights how many people depend upon the PFE for countryside recreation. As a Committee, we believe that delivery of this level of public benefit is attributable to public ownership and the stewardship ethos of the Forestry Commission. While private and voluntary woodland owners can and do deliver public benefits, we believe that a strong state forest is a bedrock for these other sectors. We are concerned that this consultation is running in parallel with the Operational Efficiency Review. While we appreciate that the two exercises are separate, we express a strong view that any asset sales or operational savings involving PFE land should only take place where there is a clear public benefit justification for the sale/efficiency and there is re-investment in the PFE to ensure it continues to deliver all the outcomes sought in the ETWF. **North West England Regional Advisory Committee***

*Plantlife strongly believes that FCE should be delivering exemplary nature conservation benefits (biodiversity, maintenance of historic landscapes and vegetation types) across the whole of the Public Forest Estate, but all-too-often timber production remains the principal focus of activity, though the economics of this approach have been challenged by the DEFRA/Treasury funded 'Crabtree' report and other publications. Accordingly, under these circumstances, we believe the net cost to the public to be high. **Plantlife***

---

*The wider benefits to the economy of having the forests would warrant a much higher net spend than currently, should it be required. There is probably a good return to be had for increased investment in facilities that will attract wider spending in the economy such as tourism.* **Chris Willsher**

*FC has been successfully going for a long time. Taken overall it has made a significantly valuable contribution to the whole UK forest estate (Private and public sectors). It must be firmly supported, in appropriate long term strategies, to continue to be able to adapt and carry forward to the future, the admirable momentum of adaptability it has been able to demonstrate to date.* **Tyne and Wear Local Access Forum**

*The net cost of the public forest estate is relatively low when compared with the wider environmental, health and general well being benefits provided. It would be difficult to justify an increase in the net cost in the current economic situation, which could be felt for the full duration of the period covered by this consultation.* **Peter Sugden**

*I understand that the public forest is relatively inexpensive to the taxpayer, it is a balance between producing timber at a net income and providing public amenity and wildlife habitat at a net cost, both are worthwhile. In a small crowded island I think that the aspiration should be to manage the public forest to produce higher value products rather than low value bulk product, this requires more investment initially to generate more income subsequently like our neighbouring European countries with forestry cultures.* **Lincolnshire County Council**

*In general, the cost to the public finances for a wide range of benefits provided by the public forest estate is value for money.* **Iggesund Paperboard**

## **Question 6**

*I would support limited 'soft' commercial developments such as woodland holidays, some events (sports races etc) and some sustainable timber production. Events should be limited such that they do not destroy the ability of others to enjoy the forests or the value of the forests to wildlife, so nothing that encourages a large increase in traffic, or large numbers of people repeatedly attending a site. Nothing that disturbs or damages the environment (e.g. motor racing, rock concerts, etc) and no commercial activities that are not appropriate for the area or that degrade the value of the wood.* **Individual**

*Any offset mechanisms have to be carefully assessed that they do not contradict the purpose of the initial intentions, e.g. indirectly support coal power plant investment whilst preventing investments in renewable energy projects.* **Individual**

---

*I think that any housing and development within forestry areas shouldn't be allowed because forests only make up a very small percentage of UK land area and are important for helping climate change, wildlife, public health (through exercise) which gives greater public benefit long term. We have to look after resources properly as we are now beginning to understand the affects of our previous actions. **Individual***

*Firstly, are there really such things as "surplus woods and forests"?! While I am not of the "every tree is sacred" persuasion, I find it staggering that the downsizing of the national stock is casually suggested, without any guarantee that the present net total would be maintained as an irreducible baseline. Secondly, the designation "Housing and built development" above is too stark. There might be circumstances where it makes economic and environmental sense – e.g. an \*equal\* area of new woodland created as an offset for that disappearing under development, but I am not confident that this would actually happen. Experience shows that the public tend to get short-changed amid a plethora of excuses, and the powers-that-be lack the means and the guts to enforce what was originally agreed. **Individual***

*The activities I said I would support are those with which I think the Forestry Estate could earn money, without endangering the land it manages or contaminating what I see as their main duty, which is to preserve and enhance the total forested area in this country. **Carlo Rimassa***

*Involvement of the private sector should only be limited if it will result in: i. The loss of public ownership, ii. The reduction of the woodland holding, iii. A negative impact on habitats and species, iv. Permanent loss of public access, or detriment to the local community, v. No significant benefit to the FC or public. Involvement with the private sector should seek to create industry leading examples of activities which operate efficiently in sensitive environments and uphold the reputation of the FC and Government. **D Brockman***

*Any activity that is purely for commercial gain with no benefit to nature or the public should be avoided. Developers must see providing added public value as part of their cost of doing business. Copy the existing 106 funding requirement applied to building developments within communities. Simply, if you want to harvest trees purely for commercial gain you must give something back to the public other than just planting more trees to harvest later. **Peter Campbell-McBride***

*Subject to good forestry, the private sector should be employed to provide cost effect solutions to the burdening cost of managing the estate. The FC should retain overall planning and control, perhaps managing the public access and use and allow the private sector to provide guaranteed sustainable woodland regeneration and timber renewal as part of their harvesting arrangements. **UPM Tilhill***

---

*We would not support commercial enterprise if the private sector's business practices do not conform to the social and ethical principles to which the FSC adheres, or their business practices and/or investments are not sustainable. In principle the FC should adopt similar principle as do the Co-op bank. **Alastair Semple***

## **Question 7**

*1. Tree Surgeon schools/classes. 2. Branch out from the forest schools in pre-school groups. The Scandinavian approach to teaching children and giving them an understanding about nature. 3. Yurt and Tee Pee accommodation for an overnight stay in the forest. (Possibly in a clearing). 4. Wood working/carpentry training. 5. Wild living skills. How to make shelter/eat/drink in a forest. **Andy Taylor***

*Longer-term development of new mechanisms to secure investment in the natural environment could include income from the provision of ecosystem services like carbon capture and storage, or through translating into revenue for the public forest estate some of the wider (and very large) economic benefits the tourism sector gains from areas such as the New Forest, or the Forest of Dean. We would be interested in collaborating with the Forestry Commission in the development of these mechanisms. **Natural England***

*The opportunity to generate income/offset costs from the ongoing management of semi-natural habitats for wildlife should be investigated. Opportunities include: • woodfuel; • grazing; & • compost. Scale is critical for these options to be viable. Large-scale habitat re-creation that expands small/fragmented habitats, such as lowland heathland, will improve the feasibility of income/cost offsetting opportunities. **RSPB***

## **Question 8**

*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. **Dr Mark Fisher, West Yorkshire***

*The pressures for building and other development are immense, and populations are (probably) going to increase. Forests not only produce valuable products, but provided physical, visual and emotional buffers to improve the quality of life for very many people. They take a long time to mature, which means that forward thinking and long term management is important. **Susanne Dipper***

*It is the ecological quality that counts, before the overall size of the estate. The current estate does not meet government biodiversity commitments, due to emphasis on non-native plantation high forest with low species, structural and habitat diversity, much of which is on high biodiversity value restorable non-woodland habitats. **RSPB***

*FC is already a major landowner. It is far better to encourage private landowners to plant appropriate areas rather than take ownership. **Individual***

*We sometime struggle to manage what we have with the decrease in staff numbers, if we increase the size of the estate we would need more direct staff to cope. **Individual***

## **Question 9**

*Particularly welcome focus on restructuring woodlands close to urban areas to provide multi-use public benefit. Also welcome trend from conifers to broadleaves where appropriate and PAWS restoration. **Peak District National Park***

*We need a mix of conifers and broadleaves and the FC has improved that mix dramatically over the past 30 years. We need to continue in the same direction, increasing the proportion of native broadleaf trees particularly in those woods that the public access most, yet maintaining the economic benefits of faster growing trees in less sensitive locations. Special attention needs to be given to enabling the surviving pockets of ancient woodland to expand naturally by purchasing adjacent land and encouraging the native trees to colonise it. **Individual***

*The Forest Estate should remain an area where the core activity is forestry. This implies reasonably large scale operations. The purchase of urban fringe woodlands should not dilute the core mission of the FC to do forestry. If they are to be part of the Forest Estate they should be managed as woodlands not as parks or gardens, and should not become a long term drain on the Forest Estate's finances. The trend to increase the proportion of the Forest Estate that is broadleaved should be continued only if it can be shown that the management of broadleaved woodland can be economically viable and contribute to a low carbon economy. It is essential that the PFE where practicable continues to respond to the needs of timber markets. **West Midlands Regional Advisory Committee***

---

*While the move towards native broadleaves may be favoured currently for aesthetic and ecological considerations, this process should be limited by the likelihood of an increasing need for softwoods in a world which is increasingly depleting its natural resources. **Rural Services/Offroad Cycling***

*I have anxieties about the FC moving far more towards a native broadleaved estate at the expense of conifers. This may be a fad but it does not help wildlife, storage of carbon, woodfuel, etc. **FWAG and Central Bedfordshire Council***

*The past emphasis on quick growing coniferous woodland for commercial reasons should be rectified completely so as to provide more natural mixed and deciduous woodland since the public forest should be primarily viewed as a resource in its own right for conservation, education and recreation. **Individual***

*The timber industry is changing all the time but it is not as much species choice as planting in the right place that I think makes the difference. Largely softwood-dominated woodland that are excellent for timber production can be made very wildlife friendly if planned from the beginning just look at Eskdalemuir. Recreation can also be brought into the planning guiding the majority of the access away from sensitive areas. **M Phillips, Gamekeeper***

*Preserve ancient woodland, conserve woodland biodiversity - no monoculture! If timber producing areas are necessary, manage them in the best interests of wildlife and the local community. **Individual***

*The PFE should demonstrate good silvicultural practice in all woodlands e.g. areas purchased in and around towns should still be managed as a timber resource as well as providing a valued recreational resource. All species should be subject to good silvicultural practice including hardwood species, wide spaced broadleaf "amenity" planting serves little purpose. The management of forests and woodlands as a potential timber resource will emphasise to the public all the benefits that the PFE can provide and help re-establish a culture of wood and forests being functional and of having some economic worth. **Silvanus Trust***

*The wide range of woodland types on the PFE appears to be broadly delivering good public benefits. Although it can be argued that commercial softwood production can be provided as efficiently in the private sector, this should still be an important objective on the PFE since it helps support the contracting and processing sector through the use of longer term contracts and FC's commitment to harvest timber. This of course helps support the many other benefits that active management provides in both the public and private sector. There are still many changes to be made due to inappropriate landscape impact or through opportunities to restore woodland and open habitats or heritage sites but these are generally being addressed, albeit rather slowly. In a few cases larger scale deforestation might be required to reach modern expectations but in general these are rare and so the overall assessment is in the 'broadly right' category. **North York Moors National Park Authority***

---

*The public forest estate in the Lake District National Park offers an excellent resource which has the capacity to accommodate a highly diverse range of activities as well as a broad range of habitats and species. It is a particular attribute of the two Forest Parks at Grizedale and Whinlatter that they 'conceal' a wide range of sporting and recreational attractions and facilities with minimal environmental or landscape impact. The trend towards continuous cover woodland management is considered a good one, which is well received by local people and visitors who value an evolving landscape. Equally the Commission's work, with partners, to naturalise Ennerdale by removing inappropriate planting and leaving open ground and replanting with native species has been much welcomed. In changing the composition of woodlands the Commission needs to balance habitat requirements (to favour red squirrels for example, or encourage rare species such as osprey, hen harrier, goshawk and pine martin) with income generation from timber production and recreational activity.* **Lake District National Park Authority**

*Recently there has been a change of direction and therefore a loss of focus on commercial timber production resulting in net deforestation of commercial crops. If this policy continues the public forest estate will not be in a strong position to help mitigate the effects of climate change. The public forest estate must maximise its potential to help address climate change. This can be achieved by increased planting of commercial crops and sustainable management.* **Iggesund Paperboard**

*It is important that the Forestry Commission continue to restore planted ancient woodlands (PAWS). We believe that greater effort and resources should be put into restoring these damaged woodlands. There is also a need to move forestry plantations from former open landscapes such as lowland heathland to land of low intrinsic biodiversity value such as agriculturally improved grassland. It may be that in certain circumstances and situations, organisations other than the Forestry Commission (e.g. RSPB, National Trust or Wildlife Trusts) are better able to undertake this change in the type and location of woodland within the current Public Forest Estate.* **New Forest Association**

## **Question 10**

*The Commission should only be allowed to sell woods in exceptional circumstances. We should be going in the opposite direction, making acquisitions! I think it is particularly wrong that the Commission is able to sell ancient woodland. Even if it is sold to conservation organisations as safe purchasers, they are bearing too much of the burden of conserving the nation's wildlife as it is. The public estate should take a greater share of the responsibility for this. The Forestry Commission should be seen as a 'safe buyer'! It seems crazy, now that we recognise the benefit of woodland for the long term - that the Government is not focussed on increasing the size of its forest estate and providing the money to do this. Rather than talking of development opportunities and making money from asset sales we should be focussed on increasing the value of the asset. Not selling off the family silver.* **Simon Osborn**

---

*We think much more information is needed about the reasons, the benefits and the future use of funds so derived. Much more credence should be given to the views of the Region in the shape of the RACs. The current disposal policy shows a net loss of 2400 ha. A policy that results in a net loss is not acceptable; there must be a net gain in line with a national target. The current disposal policy is on a "least bad" basis as a way of generating short term revenue. The policy must change to have a default of no disposals unless a disposal is the best way of achieving a net gain (for example a land swap or the purchase of land that better meets aims). It must also be recognised that leasing land to a third party is a disposal even though the freehold is retained. Clearly where a sale or lease is desirable for achieving long-term objectives, safe purchases are to be preferred. However, a disposal is a disposal forever and influence over the future of the land is lost - so a safe purchase by itself is not a justification for disposal. A policy that allows the disposal of land because it is inconvenient to manage is not acceptable - lots of worthwhile things are a bit inconvenient! Priorities for land acquisition/creation should include accessible woodland near growing populations, wildlife habitat priorities, landscape improvements and community forests. Any woodland that is given over to other habitats must be compensated by creation of an equivalent area elsewhere.* **East of England Regional Advisory Committee**

*We remain unconvinced that Ancient Woods should be candidates for disposal as a point of principle unless there is a form of binding commitment to a long term management plan and/or maintaining certification by future owners and/or following through restoration programmes begun on PAWS sites by the Commission. The policy recommends that exceptional quality sites have to go to safe purchasers but all disposals should be to safe purchasers i.e. those who are bound by the safeguards described above. However the criteria relating to woods making a relatively limited contribution to Government objectives should be reviewed. Such sites have presumably been excluded to date on the basis that they generate significant income. However sales of such sites would generate large capital sums which could be used to create endowment funds for supporting projects which do deliver public benefits or for purchasing sites which both generate income and deliver public benefits simultaneously.* **Woodland Trust**

*RAC Members have discussed the previous disposals policy and have supported the principle of targeting woodlands that have limited public benefit (e.g. small, remote woodlands which often have access restrictions or could more effectively be managed by neighbouring / other landowners). The scale of disposals in Yorkshire and The Humber region in recent years has been relatively small combined with a significant investment programme in new facilities such as at Dalby and the creation of the South Yorkshire Community woodlands. Members also noted that any disposals policy needs to be set against the context of the fact that the region has a relative low level of woodland cover and has an agreed regional objective of increasing woodland cover, particularly around the urban areas in South / West Yorkshire and also in the Yorkshire Dales area.* **Yorkshire and The Humber Region Regional Advisory Committee**

---

*We recognise that there will be pressure in forthcoming years for the PFE to reduce its call on the public purse. The present disposals policy has clearly been effective in generating income and reducing the call on the public purse, without apparently affecting operational efficiency. However, if the income streams are beginning to dry up as a result of application of the present criteria, then we suggest a more relaxed interpretation of the existing criteria is appropriate. The use of scoring systems such as the Public Benefit Recording System or simpler criteria such as proximity to population centres, may be useful to provide evidence as to whether sites proposed for disposal do deliver public benefits. There should be a "special case" policy which would enable a disposal of a significant asset if the extent of income generated was such that a nationally significant ETWF objective could be realised. For example, the National Trust generated a significant sum from disposal of agricultural land near Manchester for housing. It used the revenues to fund essential management and pro-active interpretation on its estate. It also insisted that the housing development was constructed to exemplar standards of sustainability, which meant having to forego some income that could have been generated from a 100% commercial sale. Any such sale of a significant asset would need to be approved by a board of reference. Any change in disposals policy should be subject to monitoring and review. There comes a point for most organisations where asset-disposals can lead to reduced operational efficiency and/or failure to deliver the core objectives. The monitoring system should be set in place to evaluate the impact of a more aggressive disposal policy on efficiency and delivery of core objectives.* **North West England Regional Advisory Committee**

*Plantlife is concerned that the criteria used for selecting land for disposal might result in the sale of areas with high biodiversity, particularly for areas of high nature conservation value on undesignated sites, or unrecognised areas with potential for restoration (both for intrinsic reasons and strategic reasons - e.g. linking adjacent SSSIs). We welcome the FCE's active management and enhancement of such areas. We are particularly concerned that once land is out of public ownership, there may be fewer mechanisms for protecting undesignated sites or areas with future potential, and for controlling future management activity. The 'safe purchaser' concept should be extended to sites beyond SSIs, AONBs and ancient woodland sites, to include sites within SPAs, SACs, Ramsar sites, as well as non-statutory Important Bird Areas and Important Plant Areas.* **Plantlife**

## **Question 12**

*Public Forest Estate should be used as an exemplar of best practice and as a test bed for innovative methods of carbon storage. FC should also endeavour to lead the way to others in the woodland industry in reducing its own carbon emissions.* **Blackdown Hills AONB**

*FC should look to maximise the facility provided by trees to produce materials that we need for all sectors of society reducing reliance on fossil fuel based items.* **Individual**

---

*We do however need to be aware that we cannot solve the problem but just lead by example. Without more detailed research on the impacts of such transitions in work, its effectiveness and impact both positive and negative, I think we should be cautious with how we proceed.*

**Individual**

*The protection of the PFE from the effects of wildfire is of the utmost importance. Consideration should be given to the changing climate and the likelihood of increased numbers and size of wildfire events. Spokesperson for English Wildfire Forum and Chief Fire Officers Association*

*There needs to be more work in this area especially where current gain is only 0.2%. Individual*

*Shouldn't over-ride other issues of recreation and public amenities. Chris Mitchell*

*Relative to the enormous carbon emissions in the UK, Public Forest Estate will have a relatively low impact in mitigating climate change. While carbon issues need to be considered and recognized, they should not be an overriding priority. Bruce Liggitt*

*FC should look to maximise the facility provided by trees to produce materials that we need for all sectors of society reducing reliance on fossil fuel based items. Individual*

*This is important but the argument of off setting carbon emissions with tree planting is a fallacy. Trees can and do help to reduce the carbon dioxide in the atmosphere but so do other habitats including grassland and especially aquatic and marine habitats. Complete Ecology Ltd*

*The Public Forest Estate has a large role to play in promoting the reduction of CO2 levels. Agreed government targets have to be adhered to and although the Public Estate is only one factor in contributing to a low carbon economy it can still be considered of importance. Individual*

*CO2 absorption is important, but shouldn't be the main criterion in deciding what to plant (i.e. one shouldn't primarily go for fast-growing species). Wigan Local Access Forum*

*Our industry can be proud of our environmental credentials. We lead the field in many ways. We should continue to move to a low-carbon economy. Individual*

*Considerations of absorbing CO2 should not result in an emphasis on conifer planting. It would seem preferable to increase the overall area of woodland so that broadleaves could be used to achieve an equivalent effect. Philip Bisatt, Somerset*

*We should show leadership in this matter to the rest of the country but it needs balance also.*  
**Jim O'Neill**

*We should be producing as much timber for construction as possible in order to reduce emissions and store more carbon in infrastructure.* **Sylvan Environmental Ltd and Senior Lecturer in Environmental Sociology**

*Greater use of home grown timber in house building.* **Individual**

*Provide provision for development of renewable energy.* **Individual**

### **Question 13**

*The public forest estate has a significant market share of timber. Sale of timber needs to be carried out in a fair, open and transparent way to enable a range of organisations and entities to have access to it. This will help ensure that benefits from use of timber are optimised. It will also help ensure that decisions about use of timber to best effect are taken on the basis of good market information. It is important that any emerging areas of market failure are addressed, for example where uncertainty (lack of information) about availability of resources leads to price spikes or troughs, but broadly ICF feels that a market led approach currently offers the best way forward. We would have concerns should the public forest estate seek to ring fence timber volumes for particular market segments that this should not lead to inappropriate distortion of the market. However consideration should be given to the desirability of carbon pricing, together with pricing mechanisms for other "ecosystem services" - these are mentioned in the consultation documents but such markets are currently in their infancy.*

*The public sector could help encourage installation of wood fuel heating systems by setting the example of installing them in their own buildings. The public sector should commit to providing good quality forecast information and bringing a sustained quantity of timber to the market for the foreseeable future. As stated elsewhere, climate change induced uncertainty is likely to be significant so the government should seek to minimise additional sources of uncertainty, including those created by changes to public policy.* **Institute of Chartered Foresters**

*This is a guarded yes - it depends - restrictions would have to be put in place to enable forested areas to remain sustainable and limit damage to the local environment.* **Individual**

*Management of private woodlands is also an important driver for wood fuel markets. It is therefore important that the Estate does not 'flood' local markets and reduce the potential for increased private woodland management.* **National Forest Company**

---

*This must be done in a manner that enhances the biological condition of native woodland habitats and species and open ground habitat biodiversity. **RSPB***

*Yes, make more timber available for renewable fuel but better grade timber suitable for other uses should not be diverted into the woodfuel market. Diverting good quality material into woodfuel will result in the FC compromising its objective of bringing neglected woodland back into management, as much of the material stored in neglected woodlands is of a lower grade suitable for firewood and woodfuel. **Silvanus Trust***

*The introduction of some kind of renewable heat incentive has been indicated by Government and should lead to significantly increased demand for woodfuel over time, and possibly to higher prices. This should be seen as a business opportunity for the Forestry Commission. There is room both for a flourishing public sector and private sector in supplying woodfuel. It may also be appropriate for the Forestry Commission to support the downstream needs for woodfuel production such as chipping and pelleting facilities. **National Association for AONBs***

*The Forestry Commission should consider making more wood available for renewable energy although care should be taken to avoid any significant product substitution that could adversely affect existing markets which are delivering other benefits (e.g. product substitution). The Woodfuel Strategy clearly identifies the most significant opportunity, as being in England's under-managed woodland and this should be the focus. However the Forestry Commission could have a role in supporting local/community based schemes providing a direct connection between woodland management and local heat use. **Yorkshire and The Humber Regional Advisory Committee***

*Provided this does not disrupt the heart of the forest and the peaceful enjoyment enjoyed by the public. Perhaps the Commission could purchase 'waste land' and develop this to supply sustainable wood fuel. Wood from existing forests should be from fallen trees, felling of trees in danger of falling, trees felled for the overall improvement of flora and fauna and natural 'dead wood'. The Commission could also run 'Christmas Tree recycling' schemes and use this wood for fuel supplies. **Individual***

*I see a lot of wasted potential here. I think the Commission should look at traditional management of woodland as an opportunity to achieve many objectives, e.g. managing land as community coppice rotations. Allowing local people to form some kind of syndicate to coppice materials, run courses and workshops, e.g. members of the public managing small areas of woodland, having systems like this in place could generate a reasonable income, e.g. people would pay a kind of membership with very few running costs, e.g. no management work needed by the FC. The FC could target neglected woodland and coppice within its acquisition programme to create opportunities for this. Also great benefits for wildlife and carbon sequestration. **Individual***

---

*This should be done with a gradual phase in that takes in a very long term plan to fit with further acquisition. **Chris Strickland***

*Working in partnership with Local Authorities/County Authorities so schools and other buildings that are used by a significant number of people can benefit from renewable fuels and hopefully, make effective use of public funds to support local forest industry. **Chris O'Connor***

*Where possible local communities should be offered the opportunity to clear wood for firewood. **Taunton Deane Borough Council***

*Fuel is very much a secondary role for wood. **Wigan Local Access Forum***

*Our huge population would soon decimate woodland if fuel were a priority. **Alan Cooper Cabinetmaker Ltd***

*This cannot be answered by simply offering yes or no. If commercial exploitation results in loss or decline of ecosystem services - carbon storage and biodiversity decline then we have a problem that is potentially greater than lack of sufficient timber. **Individual***

*We broadly support the use of harvested hardwood for woodfuel and the implication that this would be reliant on restocking appropriate areas with mixed native broadleaved species: however, the wider aspects of dealing with products of combustion (and incomplete combustion) do not appear to have been addressed. Many modern houses do not have open fires or adequate space for wood-fired (pellets) boilers or stockpiling the raw material. Transport of low density high bulk material can be costly in terms of transport carbon emissions. Such heating would therefore need to be in larger municipal or corporate buildings or on new estates with a central boiler system to feed several properties. The supply of wood fuel should not depend on planting yet another monoculture such as birch or fast rotation coppice. Clearly this would be contrary to the aims of enhancing biodiversity. It has been well known for decades that monocultures of both herbaceous and woody crops risk the rapid spread of pests and diseases. We are now seeing this in our conifer plantations with Red Band Needle Blight. The control of use of pesticides is becoming increasingly stringent and is inappropriate in those parts of the PFE that are open access land. **Environment Theme Action Group, East Dorset Community Partnership***

*Encourage local coppicing businesses. Educate the public about fuel efficiency and conservation, and encourage others, including the government, to do so. Avoid commercial scale biomass combustion. Use solar and wind power in preference. Use forestry wastes for biomass plants or biochar production (and associated biofuels). **University of Liverpool***

*Managing private woodlands, supporting private owners to manage their woods, providing expertise at cost. **Individual***

---

*Facilitating the setup of woodfuel businesses. Forming partnerships to encourage other landowners to develop woodfuel supplies. Providing resources such as storage facilities or shared machinery to enable landowners/businesses to successfully manage woodfuel supplies.* **Jo Lyndsay**

*Bring back the British rural charcoal industry - cottage crafts.* **Individual**

*Increasing the amount of sustainably produced UK charcoal would be beneficial.* **Individual**

*Make available new planting areas i.e. quick growing rotation crops for the growing market in biomass energy.* **Woodgate Sawmills Ltd**

*Perhaps encourage coppicing on small plots near towns and villages.* **Individual**

## **Question 14**

*Only where existing sites are suitable, sites for wind generation should not result in a net loss of forest area (including the roading requirement). More emphasis should be placed on exploring the opportunities presented by hydro-electric.* **Silvanus Trust**

*Would want true impacts and effects to be known. Would want to be sure of true carbon impact of manufacturing and installing such structures. I think the PFE is an ideal location, as long as we avoid sensitive habitats such as semi-ancient woodlands and areas of high usage.* **Individual**

*Decisions on siting of infrastructure are a matter for local planning authorities (or the Infrastructure Planning Commission). We support the use of "Areas of Search" such as in Wales and criteria-based assessments such as in Cumbria, which provides an agreed framework for where highly visible infrastructure such as windfarms would preferentially be sited. As noted earlier (Q12) we advise against significant tree-felling to accommodate windfarms as this sends a contradictory message.* **North West Regional Advisory Committee**

*In a National Park it is preferable to locate wind turbines individually or in small clusters for local small scale generation schemes rather than as large-scale wind farms. Nonetheless, there is scope for harnessing wind power. More importantly the Commission should not confine its consideration of renewable energy to wind. There are significant opportunities for hydro power, ground source and air source heating too. In the Lake District National Park the National Park Authority has commissioned an audit of potential hydro sites and the Forestry Commission regionally is also actively engaged in this initiative.* **Lake District National Park Authority**

---

*This is a sensitive issue, particularly in landscape and local community terms. Sites need to be considered on a case-by-case basis. We welcome the current discussions taking place at a national level. We would also welcome early involvement in local proposals that could prove contentious. All proposals by the Forestry Commission to develop renewable energy generation on the public forest estate need to be exemplars of best practice. They must be seen as meeting the duties proscribed for public bodies on landscape and biodiversity under the CROW Act and also Forestry Commission's responsibilities with respect to the European Landscape Convention.*

**Natural England**

*Wind power is not a good choice as it will always need a backup system in case the wind doesn't blow; it is an eyesore and a danger to flying wildlife. Water and biomass have a far greater potential especially tidal generators and hydro dams. With the right planning hydro dams would create habitat and recreational opportunities.*

**M Phillips, Gamekeeper**

*All wind power will eventually be generated off shore. The FC should not get involved with the short term exercise of wind power generation, but focus on the long term objectives of providing natural woodland.*

**Individual**

*100% against wind turbines in the forest. Water based power generation would be acceptable.*

**Individual**

*The creation of a wind farm in a forest restricts public access and usage. The creation of a hydro-electric scheme would be much more acceptable. If it's a wind farm on ground to be sold, then the other side of the equation is new woodland with an equally-sized footprint.*

**Individual**

## **Question 15**

*The RSPB recognises the important role forestry can play in addressing climate change impacts, in particular adaptation for biodiversity and mitigation through peatland restoration as well as product substitution. We do, however, consider that the main climate change issue is reducing key green house gas emissions from society at source, rather than afforestation to mitigate a small proportion of the UK's greenhouse gas emissions. Forestry Commission England's land management should be aligned to the carbon efficient approach of the revised UK Forestry Standard and associated guidelines. We note that carbon science and UK forestry is under debate, with lack of important data on soil carbon. The Forestry Commission recognises that 'Carbon' concerns do not over-ride biodiversity targets, including in relation to the restoration of priority open ground habitats, such as lowland heathland<sup>10</sup>. Forestry Commission England should restore more peatland on the Public Forest Estate, for climate change mitigation as well as biodiversity conservation reasons.*

**RSPB**

---

*The repeated emphasis on climate change despite the very small impact that our coniferous forests and their management have on national and global carbon emissions suggests total lack of scientific objectivity by the authors of this consultation document. We appreciate that in order to get funding from Central Government there is a need to ensure that you demonstrate how you are going to contribute to certain policies but this one seems to dominate to the exclusion of biodiversity and other aspects of responsibility for the natural environment, quality of life and sustainability. The recently published DEFRA Soil Strategy (September 2009) has highlighted the minimal contribution that forestry in the UK plays in sequestration of carbon compared with the role of soil. It is the soil of the PFE, which needs the greatest protection. We agree that a change of mind-set is needed by the general population but principally we need commitment by the Government. It is the large changes in fuel consumption that will be meaningful and these can only be achieved by taking urgent large scale action. They have dithered for too long. Promotion of behaviour change in the population is probably better achieved at a more local community level. If the FC is aiming to quantify the benefits of what it does an output such as behaviour change is definitely one to be avoided. In SE Dorset, a substantial contribution can be made to reducing motorised visits to the wider countryside (not just the PFE) through the development of the proposed Stour Valley Community Forest with its cycleways and footpaths, creating a mixed native hardwood forest that is accessible to our urban population. We recommend that the FC continue to play a major role in the development and implementation of plans for this significant enterprise. Simultaneously, phased clearance of significant areas of coniferous plantations should be implemented at a much faster rate than proposed in the Open Habitats consultation. Heathland and native mixed woodland should be re-instated to achieve more permanent carbon sequestration both above and below ground. We have discussed in answer to question 6b the way in which developer contributions might be used to contribute to such projects. We support growing high quality timber suitable for joinery and the construction industry on appropriate soils and in situations where such industry does not compete with biodiversity interests. Hotter drier summers and warmer wetter winters are likely to increase carbon sequestration and hence tree growth. Fast grown timber is weak. The variable climate now predicted can result in poor definition of annual rings and considerable variation in density. The stronger winds that are predicted to be a feature of climate change will also result in loss of immature trees in thin heathland soils where the root systems are too shallow to provide adequate anchorage. Scots Pine has the highest yield class when grown in the cooler parts of Europe. Thus to support our timber industry we should concentrate on softwood production where it grows best. In our rapidly expanding urban areas the demand for "instant" large scale green infrastructure will be enormous: it is here that we should concentrate our efforts in planting those native species that can take advantage of climate change, attain an appearance of some maturity early on in the development of parks and community forests and create local micro-climates that mitigate the effects of climate change.* **Environment Theme Action Group, East Dorset Community**

*Carbon storage and retention in SOILS is the most important single factor.* **National Trust**

*Renewable energy sites need to be local to where the energy is to be used and also priority given to local community start up groups.* **Kevin Coleman, Oxfordshire**

---

*Promotion of small-scale water power and geothermal energy. **Cambridgeshire Local Access Forum***

*Fuel substitution has been demonstrated to be by far the most cost effective means of carbon remediation at this time (10-15x more so than wind turbines for instance), and so this is where the main effort should go. Anything that detracts from this would be a dangerous distraction. **Project Leader, Forest Research***

*Low-carbon forest camps for children (as above) where they learn woodcraft. Absolutely, no hospitality given to high-carbon activities such as noisy concerts, sporting events (particularly motorbikes). Educational and working weekends/holidays for adult volunteers, helping manage forests and studying birdlife, etc. The role of the Forestry Commission should be consistent, i.e., to be low-carbon in its entire approach to managing forests. **Rosemary Pettit***

## **Question 16**

*The Institute of Chartered Foresters represents professionals working with trees in towns as well as forests. At our study tour in the National Forest in 2008, we heard that there is a need for a lead body to pursue the recommendations set out in the "Trees in Towns II" report. ICF has no strong views about which public body should take on this role but we note that no public body is currently taking this on. A number of our members practicing in Arboriculture have suggested a role for Forest Enterprise in expanding the public forest estate to deliver benefits in this area. There is clearly a need for leadership here and there could be benefits if FC/FE were to take on a larger role in this area. Further discussion is needed to determine how this can be done most effectively but there is a certain urgency to ensure the Trees in Towns II agenda is not left undelivered. **Institute of Chartered Foresters, Edinburgh***

*As such a large landowner FC is in a prime position to assist, especially in relation to providing a robustness and connectivity between habitats, for species to move in the face of climate change. This responsibility is one that FC has largely started to assume for itself over the past few decades, shifting increasingly from purely growing timber. Demonstrating and by own actions, actually practising sustainable land mgt, on a scale not available to many smaller land owning bodies, is a role that FC must play and potentially is better equipped than most. **Individual***

*More woodland creation is required close to communities. These woodfuel lots could help communicate to local people the benefits of trees and woodland management in our effort to combat climate change. Community ownership of some of the estate could also support this process. If communities require woodfuel then why not seek to secure local supplies from the local public estate? **Individual***

---

*Education and communication with the wider public who are not directly involved with the FC or associated forest industries. Introducing children to woods and forests at an early age can also help to influence their parents/care givers. A much greater understanding of trees and just what the benefits to climate change are is vastly needed and the PFE is best placed to undertake and fulfil this role. **Individual***

*Putting people back in touch with nature even when they live in cities. This needs to be as part of their education with schools making use of the forest amenities and also by its use as a readily accessible leisure resource and holiday destination. Providing wood and other renewable resource as fuel, raw material or even food. **David Dewsbury, Glos***

*Education, providing local wood fuel and other produce into local markets as exemplars of sustainability will encourage local recreation. **Small Woods Association***

## **Question 17**

*We support your description of the role the public forest estate should play in helping wildlife adapt to climate change. This role is captured by the statement that the priority is to develop ecologically-resilient and varied landscapes and through protection, restoration and expansion of existing woodland and the establishment of new networks of sites. The public forest estate's role is first in the management of its own land which includes a wide range of SSSIs (both wooded and unwooded) and other habitats of importance for biodiversity. Currently it is likely that the SSSIs on public forest estate will exceed the 95% condition target in 2010. There is also a strong programme of restoring other open habitats and ancient woodland sites that had been damaged by coniferous planting in the past. Action through the public forest estate also has an influence on wildlife management beyond its boundaries through: research and testing out new approaches; demonstration, guidance and advice; outreach and partnership working; use of powers to acquire land. **Natural England***

*Restore wildlife habitats to increase their area and reduce fragmentation. This can be achieved by removing non-indigenous trees from semi-natural woodlands, restoring open habitats where these have been planted with non-indigenous trees and planting new woodlands on agriculturally improved grassland and arable land. **New Forest Association***

*In order to ensure that wildlife adapts to climate change we must improve the ecological condition of our woodlands both public and private. Populations that are in serious decline are less likely to cope with the added stresses of climate change. We need to build habitat networks that are resilient by working across landscapes to enable wildlife to respond to climate change. This would include management of connective features such as rides in addition to areas occupied by priority species. **Butterfly Conservation***

*Biodiversity management – first and foremost, priority should be given to undertaking high quality management across all the Estate’s habitats to ensure they are as robust as possible to the threats from climate change. This will help to ensure that there are core areas of habitat from which wider links can be made to other significant blocks of habitat. Habitat expansion – the Estate should be a strong partner in supporting landscape-scale habitat connectivity initiatives, particularly ones with a woodland focus. There will be instances where strategic land acquisition by the Forestry Commission (eg: for woodland creation) can help to make new links between habitats. The NFC thinks that the prime focus for this activity should be within established woodland creation priority areas. This would build upon the woodland investment already made in these areas and help to maximise the benefits of woodland habitat expansion at a landscape-scale. There may also be potential in established woodland landscapes (eg: the New Forest). **National Forest Company***

*To increase the infrastructure of trees and woodland to provide rich and resilient habitat networks for species diversity and migration. Where open habitats are being created on Estate land these will still offer varying degrees of carbon storage depending on the type of habitat, vegetation or soil type. The delivery of this role will also provide the social benefits highlighted above. **North Yorkshire County Council***

*The FC Estate can: a) deliver on UK Biodiversity Action Plan priorities through species and habitat management; b) demonstrate the highest standards of forestry practice to landowners and visitors, meeting both environmental standard and best practice in forestry operation and commercial standards c) meet national and European targets on species and habitat protection and expansion The FC and the estate, sometimes working in partnership with others, can deliver and reduce the effects of climate change through its management, either through the existing management or by altering management through changes to the felling and planting cycles and species planted and through habitat and ecosystem restoration. In general we should expect that an estate under public management should receive a higher standard of management that can help meet these targets. Acquisition of new land for planting or creating other new habitats, and reducing the effects of climate change should be a priority. The FC estate has a significant role to play, alongside other govt. depts. I.e. Natural England, land in public ownership i.e. through local authorities and in partnerships in demonstrating the benefits of managing land at a landscape scale. The FC should set the standards and demonstrate how to manage and restore sites, and purchase sites so that they provide valuable areas of connectivity and buffering of important land e.g. wood pasture for wildlife. **Herefordshire Nature Trust***

*There is a desperate shortage of opportunities for wildlife to move around because of the way the countryside has developed. With the advent of serious climate warming many species must be able to move in order to survive but are isolated in areas from which they cannot escape. The PFE, in conjunction with other wildlife land providers, needs to do all it can to provide corridors of varied wildlife habitat in order to prevent large numbers of species from becoming extinct. Even without climate warming this is already a serious problem resulting in gene pools becoming degraded. The types of habitat should include heathland, ponds and wetland, open grassland, etc in addition to woodland and woodland edge habitats. **David Dewsbury, Glos***

---

*Above all the PFE and the FC must get to grips with fundamental concepts of the impact of climate change on habitats and ecological communities. There has been no evidence of this in any of the three recent consultations to which we have responded. The Council of Europe has published (2007) an excellent introduction (no 149 in its Nature and Environment series). It highlights the way in which in general terms the geographical range of a community will move northwards and locally will move uphill. However within and between communities there will be significant differences, as individual species will each react to changes in climate in a different way i.e. a shift in "climate-space". They specifically ask, how can a habitat move if there are barriers to movement such as agricultural land or commercial forests of non-native trees? Within each community there will be individualistic physiological responses of the individuals that form species populations. The authors express particular concern for protecting mycorrhizae and understanding the effects of climate change on the biota of the soil and on species rich taxa such as bryophytes, lichens, fungi, algae and invertebrates. None of this appears to have been given any consideration nor have many of the other issues such as impact on genetic diversity – in a changing environment our natural ecosystems need species whose individuals have a variable genetic make-up. The restoration of our native habitats to retain our genetic diversity is critical. **Environment Theme Action Group, East Dorset Community***

## **Question 25**

*A combination of increased public subsidy, coming ultimately from taxpayers; revenue from carbon credits from a carbon trading mechanism; potentially a levy on producers and users of timber and paper products such as the newspaper industry (not politically popular but such levies should be explored); some increased charging for leisure facilities; much greater development of markets for timber for high value uses such as furniture; of development of markets for products such as charcoal etc. In summary, there is a need to be a bit more imaginative and not just look at timber and 'development opportunities' from sales of land. This though will need the Government to provide much more financial support, and with the Forestry Commission not just struggling to stay afloat but expanding its estate for the long-term. I do though think the consultation has paid insufficient attention to financing mechanisms. **Simon Osborn***

*There is scope for increased revenue generation from leisure activity concessions and from sale/lease of areas to leisure/holiday/windfarm operators. Consideration could be given to occasional sales of significant assets to enable nationally-significant initiatives on PFE land. This would usually involve some form of development so the sale would need to be approved by a board of reference which would take into account the potential public benefit of the land to be sold, and the new initiative that would be funded from the sale. We support further research into monetary valuation of the green infrastructural (or ecosystem services) benefits generated from the PFE. This will help to justify the case for continued parliamentary support, and it could be used as evidence for developer contributions in respect of green infrastructure. **North West Regional Advisory Committee***

---

*Providing woodland and forest close to urban areas needs to be seen as a key part of the recreational and environmental sustainability 'offer'. Funding needs to be linked to urban development in growth areas (for example, to buy and manage land). Possibly this could be provided by developers using S106 agreements or the Community Infrastructure Levy (CIL), or land could be purchased by other public bodies such as the HCA, and leased to or managed as part of the Public Forest Estate. **Phil Bisatt, Somerset***

*1. Restructuring of Government funding; mainly from the DEFRA pot, but also recognising the contribution made to health, social and urban development programmes. Individual Government IT programme projects have wasted more money than the FC has spent in its entire existence. 2. Increased income generation through more efficient management of tourism business points; Westonbirt, Dalby, High Lodge, etc. **D Brockman***

## **Question 27**

*I am hoping to put forward the case of the New Forest. The New Forest Association, of which I used to be a member, has argued against proposals by Forest Holidays to increase footfall in the area. This led me to leave the Association, as I see it as being purely a vehicle for local residents to keep the forest empty and in the last century. I hope that we can at least provide a centre such as exists in other areas. The New Forest is a large area with an enormous catchment area, and if handled well and sensitively, could be the flagship model for sustainable activities of all sorts, for a huge number of visitors and local residents, while providing revenue for the Commission as well as badly needed jobs for satellite towns and villages. I am a mountain biker, and I would like to see something on my doorstep, rather than having to travel to Wales or the north of England, placing more of a carbon burden which this study is seeking to help. **Individual***

*Public forests must focus on providing public benefits. They are no longer solely about producing timber; forests owned by the nation must serve the nation's needs and respond to change. Therefore the clear priorities for the public forest estate include helping to mitigate and adapt to climate change, helping meet the water quality objectives of the Water Framework Directive, creating new woods close to people by taking part in the planning of new communities, enhancing the quality of life for residents of existing communities, and providing recreational facilities with health and educational benefits. The estate should focus on conserving the very best of woodland biodiversity and wooded landscapes, including the restoration of planted ancient woodland sites (PAWS) and semi-natural open-ground habitats. We know that this requires money. Some of the Commission's forests are remote and provide little public benefit and focus still on timber production. To create funds to invest in delivery of more public benefit, why not transfer those assets permanently or in the medium term to those who specialise in timber production, subject to specific safeguards. **Peter Campbell-McBride***

---

*The forests of England mean very different things to different people and organisations. These varied interests are often seen as conflicting but in reality need not be. The first essential of our woodlands must be to provide havens for all forms of wildlife and to be the 'lungs' keeping our air quality up. After this it is both desirable and politically essential that the population at large have an opportunity to enjoy them. Unless the people can take enjoyment from the woods, they and their representatives are unlikely to continue to support the costs of maintaining them or to resist pressures to encroach upon them for housing etc. Pressures are mounting to add woodlands to the 'right to roam' legislation and the best way to retain an element of control is to be able to demonstrate the amount of usage already being seen and the number of interests successfully co-existing. I am aware that much of the estate has been voluntarily given over to 'open access' One of the great difficulties in the past has been the reluctance of users to co-operate with other interests and we see one of the principal roles of Forest Enterprise as being the catalyst and point of contact to bring all interests together and foster an understanding of other users' sensibilities. It is a common misconception that rambling, cross country running, cycling and orienteering have a negative impact on wildlife but numerous environmental assessments have shown this not to be the case and most sports would welcome any opportunity to demonstrate this. The very nature of many of these interests spreads the participants out thinly within the woods leading to only short term disturbance which the wildlife easily accommodate. They usually liaise closely with organisations who are prepared to work with them and have re-routed events to avoid sensitive flora and nesting birds etc. There are examples where such use is made of woods which form highly commercial shoots without any conflict with those interests by avoiding breeding, rearing and shooting periods. Some shoots, normally tenants rather than land owners, resist any encroachment into their areas at any time and these selfish attitudes rather than constructive engagement do fuel the wrath of militant ramblers and such, often triggering conflict and occasional resort to law. Various conservation groups are perfectly happy to work with responsible sporting organisations and find no problem with their occasional activity but others see sporting interests as potential defilers of 'their' woods and no amount of cajoling will encourage them to even come and see the total lack of after-effects. People who enjoy sport in woodland locations are normally environmentally conscious, and when planning events, avoid sensitive vegetation, bird nesting sites, pheasant pens, deer sanctuaries and any other special areas brought to their attention. There are, however, numerous woodlands where people have been refused access or have lost it because of shooting interests or because of SSSI and similar status. I would contend that a proper dialogue between concerned parties could get round these perceived conflicts of interest and feel that Forest Enterprise has a constructive role to play in bringing such interests together.*

**Roy Denney**

*The value of forestry to help move to a low carbon economy cannot be underestimated. The public forest estate is in a unique position to help deliver this and many other benefits. This opportunity cannot be missed!* **Iggesund Paperboard**

*You have an extremely important resource and if managed effectively could tick many current targets in sustainability, education and biodiversity.* **Shropshire Council**

*We would welcome continued liaison on the public forest estate at local level.* **Peak District National Park Authority**

The consultation document does not discuss the wider historic environment potential embedded within the national forest estate. Many woodlands contain significant historic assets including designated monuments and these are statutorily protected. In many cases such historic assets offer further opportunities for education (section 6.5) although historic environment opportunities have not been specifically addressed within the current consultation. Similarly many woodlands are classified as ancient and may retain previously unrecorded archaeological sites within their bounds. Work within these woodlands should be informed by consultation with the appropriate County Historic Environment Record. The Forest Estate includes a series of important Royal hunting forests and other ancient and more recent woodland which are important elements within the broader historic landscape character (HLC) of the region. Historic Landscape Characterisation is recognised by the West Midlands Regional Spatial Strategy Policy QE1 (Conserving and Enhancing the Environment) QE1 B iv) which states that 'Local authorities and other and other agencies in their plans and proposals should protect and enhance the distinctive character of different parts of the Region as recognised by the natural and character areas and associated landscape character assessments, and through historic landscape characterisation.' However, the consultation document does not reference HLC, its potential in developing an understanding of the historic significance of particular woodland or its role in education. During the 20th century some conifer woodland in the Forest Estate was planted on sites of pre-existing importance for biodiversity - such as ancient woodland, heathland, blanket bog etc. The ongoing programme of conversion of PAWS to native broadleaved woodland and some conifer forest to open land is acknowledged. Restoration of further open habitat, principally heathland and bog, from conifer forest, in key locations, would enable UK Biodiversity Action Plan objectives to be met. Replacement of this resource by woodland planting on other (public or private) land of low biodiversity interest would maintain overall forest cover and could contribute to enhancing woodland networks and provision of recreational assets. **Staffordshire County Council**

It will be important that any policy options that impact upon the size and/ or location of woods on the PFE are fully tested through Economic Impact Assessment and convincing evidence. Open Habitats consultation has recently done this - Keepers of Time did not. Cost/ economic issues need full exposure as part of this Study. The original core role (timber production) of the PFE in relation to strategic timber reserves is still valid today, but the drivers are different e.g. Carbon capture and management, Green Infrastructure. The role of the Estate in Green Infrastructure delivery should be more widely recognised. The PFE should celebrate its commercial timber trading activity - this has not been as a result of an opportunistic approach but an example of responsible and prudent asset management. It is a 'best practice' example. Judging the success of the PFE will need to encompass issues other than 'the bottom line' as its contribution to sustainable living may be lost. **South West Regional Advisory Committee**

The Forestry Commission has a key role to play in working with highway authorities and local authorities to deliver up-grade crossings. There are major benefits for access users in having a safe off-road environment to walk/cycle/ride. This is part of knowledge transfer between organisations and training. The Devon Countryside Access Forum considers that there should be links with the public rights of way network and provision of sustainable transport to reach forest sites. This requires holistic working with transport providers and local authorities. Some Forestry Commission signing on open access implies that access is free for all users yet in the same woods a horse permit system operates. This is unclear and should be reviewed in the context of comments made throughout this response on free access for all users. The Forestry

---

*Commission should, through knowledge transfer, advice and funding, encourage owners of small private woodlands to develop access opportunities. This would enhance the facilities available on the Public Forest Estate. The Forestry Commission should also communicate with existing lessors, and local authorities to evaluate the opportunities for joint projects to facilitate enhanced access and to enrich the experience of visitors. The Devon Countryside Access Forum would like to commend the Forestry Commission for its clear consultation document, excellent summary and user-friendly response form. **Devon Countryside Access Forum***

*Ensuring the public have the right to access and enjoy the forest is of primary importance. Where appropriate, this may provide improvements and development of the public rights of way network to meet the needs of walkers, cyclists and horse riders. Investment in visitor facilities, signage, information and paths would all contribute to meeting this objective. **Suffolk County Council***

*We believe that many of these questions are too general and unfocused to prove a real benefit to those attempting to plot a sustainable way forward for the PFE. But if it makes the Board more aware of the need to harness public support and to give the staff the vision it needs to continue to serve the public interest with robust expertise, then it will have performed a useful function. My committee feel that the document lacks any proposals for a clear vision for the PFE. The FC should be the national champion for trees and woodland - advocating and setting a target for woodland creation in England and leading the reforestation on the country. The FC should promote the benefits of woodland, where appropriate, over other habitats. These benefits are wide ranging and of fundamental importance to society, including carbon sequestration, contribution to the creation of low carbon economy, climate change adaptation, education, provision of accessible green space and biodiversity habitat. We feel that the current disposals policy will increasingly marginalise the PFE reducing the ability of the FC to act as an exemplar. Never has the need for the FC to show leadership been more important. The economic, social and environmental objectives of the FC are widely recognised as a major and essential focus of its activities. The PFE is fundamental to delivery of objectives relating to climate change, health and economic agendas. It is essential that the PFE is managed as an exemplar for all to aspire to. This consultation should be about the mechanics of expanding the PFE and extending its ability to meet these objectives, not a consultation about whether the PFE has a future. **East of England Regional Advisory Committee***

*The North York Moors Forest has considerable experience of managing multiple interests and environmental values and this experience could be shared with other land managers. The North York Moors Forest District has produced a Cultural Heritage Strategy in consultation with English Heritage, which sets out the heritage values and wealth of experience the FC staff and partners have in managing these assets and the opportunities for enhancing community engagement with in its forests. This document represents a good summary of the values the FE estate plays in managing England's historic environment. **English Heritage***

---

*Butterfly Conservation is pleased to comment on the long term role of the public forest estate in England. We have worked closely with the Forestry Commission over many years to develop strategies and implement practical management to halt the loss of butterflies and moths from both the public estate and privately owned woodland. This work has grown over the last 15 years from management advice on single sites, to the development of specific grants for Lepidoptera, to the joint publication of a national conservation strategy for Lepidoptera. We work increasingly at a regional level with FC and have developed major projects on the estate, often involving significant fundraising for targeted habitat management. Despite this effort the government's own targets in the England Biodiversity Strategy and UK Biodiversity Action Plan are not being met on the Public Forest Estate. Butterfly Conservation believes that England's native woodlands have a vital role to play in the delivery of public benefits, which can, and should be enhanced by action on the Public Forest Estate. This includes the protection and enhancement of biodiversity, the historic environment, landscape, and environmentally sustainable public access. There has been a decline in the extent and environmental quality of our native woods, both on and off the Public Estate, that has negatively impacted UK Biodiversity Action Plan priority species, habitats and designated sites. Woodland loss, coniferisation, fragmentation and lapsed or inappropriate management are key factors. Tackling these issues on the Public Forest Estate should be at the heart of the Government's response to this biodiversity crisis. There is no reason why the state should hold large areas of wooded land solely for timber production, or other single uses such as carbon sequestration. The public forest estate should be used to add to the social and environmental well-being of the nation, and that conventional 'commercial' timber crop production is just one objective, which must be compatible with the public interest. We believe that far more emphasis and resources should be made towards the conservation of biodiversity in the forest estate, in keeping with the new biodiversity duty given to FC under the CROW Act. The English National 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 in Time. Restoration of conifer PAWS should be achieved by restructuring and removal of the conifer crop at an ecologically appropriate scale and speed, to allow the regeneration of the semi-natural component. Within this restoration programme significant areas of both permanently and temporary open space needs to be provided for the early successional communities of woodland that have declined markedly over the last century with the widespread decline in woodland management. Butterfly Conservation welcomes the government's continued commitment to sustainable multiple benefit forestry policy, regulation and practice. We note that since 1985, wildlife, landscape and geological conservation have been a statutory duty of the Forestry Commission. The state forest service has made progress in its approach to biodiversity, landscape conservation and historic environment, but such work needs to be more widespread and in a strategic fashion. Public benefits deriving from biodiversity and landscape conservation on the forest estate should be integrated into the core delivery of the Forestry Commission, not seen as an add-on once commercial forestry aims are met. If the state forest sector was to set clear national, regional and forest objectives to deliver across a wider range of public benefits, and fund them appropriately, then we believe that it would be more likely to deliver those benefits in large measure. **Butterfly Conservation***

*We would emphasise the necessity to focus on Carbon Capture through sustained forest management, afforestation and the supply of timber to rural and other businesses to support rural economies and other public benefits of woodland as a whole. **James Jones & Sons Ltd***

---

*The North York Moors National Park Authority works closely with FC through formal partnerships management agreements, joint funded projects and through the consultation process. With 15% of the NP under FC management we value the benefits the FPE brings to the area and there are many advantages to working on this large scale. Much has been done to improve the legacy of an estate planted in the 20th century almost exclusively to produce timber. Although progress has also been slow in some areas, we have seen major advances in the past few years in terms of the recreational resource (which can reduce pressure on more sensitive sites), heritage management, biodiversity improvements and landscape enhancement. Some of these changes have been seen in private woodlands but in general not to the extent or with the level of flexibility or commitment to succeed seen on the PFE. Investment in the PFE appears to be a good use of public funds and we look forward to seeing a continued, effective contribution to our own objectives from management of this land in the future. **North York Moors National Park Authority***

*Ecological skills within state forestry – it is important that the state forest sector has ecologically trained staff, in both the land management agency and the regulatory/policy/advisory arms. Working outside forest boundaries. Staff managing the state forest could have an important role in outreach advisory work, for example advising on forest management planning. The state forest should also look more carefully how its management impacts surrounding land use, for example looking at the development of high biodiversity quality open and wooded habitats at the forest edge. There also could be scope to be involved in the development of harvesting and marketing co-operatives, for example to assist biodiversity beneficial woodfuel management. Forest design standards: The RSPB has concerns that the Forestry Commission is using ecologically and conservation unproven design concepts in its Forest Planning, in particular ‘wooded heath’ and ‘moorland fringe’. Both of these concepts need to be refined so that they properly deliver priority biodiversity targets under the UK Biodiversity Action Plan. This will require Forestry Commission at GB and country level, in partnership with the country conservation agencies to work up ecologically valid conservation guidance. Forestry Commission England has a biodiversity duty under the Countryside & Rights of Way Act 2000, as well as a delivery body for government’s biodiversity commitments under 13 the UK Biodiversity Action Plan, EU Birds and Habitats Directives, Ramsar Convention and the England Biodiversity Strategy. Perversely the Forestry Commission as a regulator will not permit new planting on important open ground habitats, but is content to allow the continued replanting on restorable priority habitats in the state forest. This anomaly needs to be addressed in the revised UK Forestry Standard and Forestry Commission’s own Forest Design Plans, with a moratorium on tree restocking on restorable priority open ground habitats, as well as an ambitious programme of restoration of such habitats. Wildlife disturbance avoidance - The location, planning, timing and management of forest events, recreation, operations and development must avoid disturbance to European protected species and priority nesting birds. The questions on recreational development avoid this issue about the appropriateness of such activities. UKWAS Certification - We welcome the continued certification of the state forest against the voluntary UK Woodland Assurance Standard, which meets international Forest Stewardship Council criteria. **RSPB***



**Simon Armstrong**

 Independent and Associate Consultancy

