

## GOVERNMENT RESPONSE TO THE ENGLAND FORESTRY FORUM'S BIODIVERSITY REPORT

### Introduction

The Government welcomes the Report of the Forum's Working Group on Biodiversity. The report focused on four issues that complement a previous report on ancient woodland and the work of the England Native Woodland Partnership. There is particular relevance to implementation of both the England Biodiversity Strategy and the England Forestry Strategy.

The Government's response to the recommendations of the Working Group is set out below. For ease of reference the Committee's recommendations are reproduced in bold, using the paragraph number from the report.

### Landscape-scale Conservation (para 18)

**18(a) The Regional Forestry Frameworks need to have a spatial element, be proofed against the England Biodiversity Strategy and use landscape character assessment to inform proposals for landscape-scale change.**

The Government agrees with the desire to see an eventual spatial element within Regional Forestry Frameworks or developed through their associated action plans. It notes the strong connection between Regional Forestry Frameworks and the proposals to introduce Regional Spatial Strategies, and this is highlighted in the Forestry Commission's Regional Forestry Framework Information to Stakeholders Note (January 2003). In each of the Regional Forestry Framework processes the close involvement of the Government Offices and Regional Assemblies is helping to ensure that opportunities can be taken to influence spatial strategies. There is also an existing commitment that the Assemblies will take account of strategies that have a bearing on land-use activities. It is expected that Regional Forestry Framework Action Plans will begin to identify where any greater spatial planning approach is desirable and should help to identify the resources to achieve this in due course.

The Government believes that Regional Forestry Frameworks will make important contributions to delivery of the England Biodiversity Strategy. However, the Government does not believe that a specific 'proofing' procedure is required, although it will be putting more effort into 'embedding' the key themes and actions of the England Biodiversity Strategy directly into the Regional Forestry Framework process. We will thereby avoid the threat (cited in para 12) of regional discretion watering down national priorities.

There are already strong horizontal connections between Regional Forestry Frameworks and the Regional Biodiversity Fora, linking it to the regional strategies and priorities that have been identified. These provide a secondary 'horizontal' channel for wider aspects of the



England Biodiversity Strategy to be fed into the Regional Forestry Frameworks. Woodlands are one of the few habitats where national Habitat Action Plan area targets have already been cascaded to Natural Area level. With input from the England Woodland Biodiversity Working Group we will produce regional totals for such Habitat Action Plan targets, plus associated guidance, as a further input to the Regional Forestry Frameworks.

Regions are currently finding it helpful to use the landscape character assessments framework to inform Regional Forestry Framework scoping and priority-setting exercises. This will influence the spatial planning aspects of Regional Forestry Frameworks, their relationship to other regional strategies, and eventually any Regional Forestry Framework driven activity in particular landscapes within regions. Most of the activities needed to deliver the Habitat Action Plans, such as creating native woodland, restoring conifer plantations back to native woodland and the removal of some forests altogether, will have significant landscape impacts. Landscape Character Assessments will play an increasingly important role in the decisions the Forestry Commission makes on such operations. In the large majority of cases these actions will be exactly those required to enhance the existing landscape, building upon its distinctive character and redressing past degradation. However, we believe that landscapes need to evolve, and that Landscape Character should not be used to artificially 'preserve' past landscapes. In some landscapes significant and large-scale change may be necessary in order to create healthy, functioning ecosystems and robust habitat networks.

**18(b) The EFS needs to be reviewed to have a spatial element, informed by the Regional Forestry Framework's but developed in a national, and ideally international, context.**

The Government has yet to take any firm decisions regarding the review of its England Forestry Strategy. It acknowledges that given the proposed developments for regional planning, coupled with the emergence of Regional Forestry Frameworks by 2005, then there should be scope to give national forestry objectives and outcomes a spatial dimension in future. Revision of the England Forestry Strategy would also provide the opportunity to review objectives and the need for guidance on establishing national targets, informed by international commitments where appropriate.

**18(c) Taking advantage of the review of the UK Biodiversity Action Plan in 2005, the native woodland Habitat Action Plans should be combined, as a first step to a more joined-up approach to the development and delivery of Habitat Action Plans across all habitats.**

We welcome this proposal, and agree that combining the native woodland Habitat Action Plans into one common plan could be helpful, making them easier to comprehend, administer and monitor. We will explore this with Biodiversity Action Plan partners across the UK in the run up to the 2005 review. If one 'English Native Woodland Habitat Action Plan is produced it will important to ensure that there is still adequate focus on distinctive types of woodland,



avoiding the application of uniform treatments, and ensuring that no individual types are under-performing.

We fully acknowledge the importance of interaction between habitats, and that this requires good co-ordination between different Habitat Action Plan groups. The England Biodiversity Strategy is providing the overall framework for such an integrated approach, but we will respond positively to suggestions of other ways of improving co-ordination between the Habitat Action Plan groups.

**18(d) The FC should collaborate more closely with Defra to ensure greater integration of Agri-Environment Schemes and the England Woodland Grant Scheme.**

The Government firmly endorsed, in the England Biodiversity Strategy, the need for a landscape-scale approach to conservation. We fully recognise that interaction between woodlands and other habitats in the landscape is crucial, and that this in turn requires 'joined up' policies and delivery mechanisms.

With this in mind, the Government is looking to include woodlands on farms in farm audits, in whole farm assessments of environmental assets and in the 'whole farm approach'. The Forestry Commission and Defra have also collaborated closely in the development of the English Woodland Grant Scheme, the Entry Level Scheme and the Higher Level Scheme. Woodland protection measures are incorporated in the Entry Level pilot, and some woodland management and small-scale woodland creation are being considered for inclusion in the Higher Level Scheme.

There will be an opportunity for interested parties to comment on the degree of integration proposed during the forthcoming consultation period on these schemes. Lord Haskins is currently reviewing the delivery of rural services, and his review is expected to offer the Government opportunities for streamlining the delivery of funding schemes and other services.

**18(e) The Forestry Commission's objectives need to be reviewed so that it is judged by the Treasury on its contribution to sustainable development and so that its ability to provide forestry grants is not limited by income from timber produced by Forest Enterprise.**

The Forestry Commission's objectives are shaped by the England Forestry Strategy, which reflects international obligations, and the Commissioners statutory duties and powers. The contribution of woodland to sustainable development is fully recognised by Government and as a consequence additional public funds have been made available in the last two Spending Reviews to maintain programmes (including grants) to offset declining timber receipts from the public estate.

Any future development of the England Forestry Strategy or changes to Forestry Commission's objectives will be considered in the light of Ministers' decisions on the Rural Delivery Review and the Review of Forestry Arrangements.

**18(f) Forest Enterprise's estate reflects past emphasis on timber production and any review should consider the wider benefits that it now seeks to deliver as well as scope for working with other landowners to promote landscape-scale action, which can be achieved even within the terms of the Forestry Act.**

We will capitalise upon the fact that the Forestry Commission's estate is, in many areas, sufficiently large to act as an exemplar for landscape scale initiatives. The Forestry Commission is also keen to provide 'critical mass' for landscape-scale partnerships, where we can work in close collaboration with surrounding owners. Current examples of such partnership projects include the Wyre Forest with English Nature, Dunwich Heath in collaboration with RSPB, and the Blackdown Hills where a larger partnership is being developed with Heritage Lottery Fund funding. The Forestry Commission is also in discussion with other large landowners over collaborative approaches, particularly with SSSIs. We will continue to initiate, support and participate in such opportunities.

**18(g) Future progress by the Forestry Commission should be reported and reviewed within the framework of the England Forestry Strategy, the England Biodiversity Strategy, Regional Forestry Frameworks and the relevant Habitat Action Plans.**

The Government accepts this recommendation, but believes existing reporting procedures are already adequate, comprehensive and transparent.

The Forestry Commission collates a standing report of progress against the England Forestry Strategy for each meeting of the Forum. The Forestry Commission also leads the woodland sector of the England Biodiversity Strategy, and reports on progress by partners and itself on a regular basis. A set of quantitative outcome indicators has been agreed for each sector. The first annual 'stocktake' for the England Biodiversity Strategy is about to be published, along with the indicators. Reporting procedures for Regional Forestry Frameworks will be developed, and are likely to be closely linked to biodiversity targets agreed at a regional level. The Forestry Commission has agreed as part of its Spending Review settlement with Treasury as performance target to 'lead delivery of the native woodland Habitat Action Plans'. The Forestry Commission will therefore be reporting progress against this target in its Annual Reports.



## **Restoration of Priority Open-ground Habitats (para 28)**

**28(a) The Forestry Commission in England should establish policy principles and practice for forest removal to create open habitats, developed in conjunction with stakeholders. This should be linked to a clear statement for large-scale restoration of open-ground habitats from non-native plantations on the Forest Enterprise-managed state forest.**

The Forestry Commission is fully committed to fulfilling its obligations to all priority habitats and species. We accept that this will include removing or reducing plantations in order to restore open-ground habitats. The Forestry Commission fully accepts the need for clear policy principles and advice on practice for such activity in England. We will develop this with full input from all interested parties, and will aim to complete it by the end of 2004. In the mean time any decisions on individual cases will be made in the light of emerging policy and best practice.

In addition, the Forestry Commission has been active in restoring open-ground habitats on its own estate for many years. We have already completed or committed to restoration of over 2000 hectares of heathland, which is one third of the total Habitat Action Plan target for England. We will continue this process and the policy development will include a positive statement on restoration of all habitats on the Forestry Commission's own estate.

**28(b) The Forestry Commission should carry out an audit of open-ground habitat restoration potential across the Forest Enterprise-managed estate in England, to provide an evidence base for future contributions to open habitat action plans under the England Biodiversity Strategy.**

Forest Enterprise carried out and published a complete assessment of all Ancient Woodland on its estate in 2002, and this included assessment of restoration potential. This is proving to be invaluable in strategic planning of very extensive restoration of plantations to native woodland. We are therefore keen to repeat this approach for open-ground habitats, phasing work in response to agreed priorities. We are keen to work with partners in this, in order to achieve synergy between adjacent landowners.

We agree that heathland is one of the most extensive and important potential habitats on the Forestry Commission estate. Over the coming year we will be making a comprehensive assessment of the whole estate to recording all potential heathland sites. This will be used to inform the strategic statement on restoring open-ground habitats referred to above.

A considerable amount of information on such habitats is already available in the Forest Design Plans. These have been produced by Forest Enterprise for all the major land holdings, and include information on all existing non-woodland habitats and the areas with potential for restoration or re-creation. This data will be available on a national basis, collated from the Forestry Commission's database, by the end of this financial year. This will be updated regularly so that the area of each habitat actually restored can be reported annually.



**28(c) Regional Forestry Frameworks should be proofed for their contribution to the implementation of open-ground Habitat Action Plans under the England Biodiversity Strategy, and should take account of regional variation in restoration potential in setting priorities.**

Regional Forestry Frameworks will need to focus primarily on woodland Habitat Action Plan priorities so that related regional strategies are able to confidently cross-refer to this aspect of planning for sustainable development. However, we also recognise that Regional Forestry Frameworks and ensuing Action Plans can contribute to delivery of non-woodland Habitat Action Plans and Species Action Plans. Cross-linkages to regional environmental strategies, and inputs from regional biodiversity partners, including regional habitat targets, will be used to identify and express regional priorities in Regional Forestry Frameworks.

**28(d) There should be closer linkage between DEFRA and the Forestry Commission to enable open-ground habitat restoration and to secure long term funding for management, through integration with agri-environment schemes and the Commission's granting of felling licences. The potential of other public funding sources should be considered beyond forestry mechanisms (e.g. the Aggregates Levy Sustainability Fund), together with a possible role for fiscal incentives.**

We recognise the need for close collaboration where land is effectively transferred from forests and woodlands to other habitats to ensure that the objectives of land-use change are sustainably delivered. Where appropriate we will formalise protocols between the Forestry Commission, the Rural Development Service and English Nature, to ensure our permissions and approvals are inter-dependent and efficiently delivered. The Higher Level Scheme is currently under development, but is likely to include incentives for restoration of open ground priority habitats following removal of plantations. Other sources of funding, for both the private sector and the Forestry Commission estate, will be explored.

**28(e) Current projects and partnership initiatives for open-habitat restoration should be encouraged and used to inform the development of Forestry Commission policy and practice, and to trial procedures (such as environmental impact assessment) for large-scale restoration.**

There are a number of large-scale proposals currently under way, both by private owners and on the Forestry Commission estate. These will be invaluable for informing policy development, and increasing experience for all concerned of the practical issues to be addressed. Environmental Impact Assessments give a specific statutory responsibility to the Forestry Commission, and are subject to detailed regulations and specific procedures. They will certainly have a role in large-scale proposals for complete forest removal, but for smaller scale restoration less formal procedures for addressing all relevant issues will be more appropriate.

We would stress the potential for achieving the habitat restoration and the species' needs without complete removal of all forest cover. In many cases the solution may be a substantial reduction in canopy cover, to create wood pasture or other habitats which are intermediate between closed forest and open-ground. The ideal outcome would often be a dynamic and fluid mosaic of such habitats, and Forestry Commission's approval procedures may need to be developed to accommodate such situations.

**28(f) Performance agreements for the Forestry Commission should include the delivery of biodiversity objectives for open-habitats as well as woodland. Future progress by the FC should be reported and reviewed within the framework of the England Biodiversity Strategy and relevant Habitat Action Plans as well as in the England Forestry Strategy and Regional Forestry Frameworks.**

Spending Review targets are necessarily illustrative and cannot cover all of a department's activities. The 2002 Spending Review biodiversity targets for the Forestry Commission reflect both its statutory responsibilities for Sites of Special Scientific Interest (SSSIs) and its lead role on native woodland Habitat Action Plans. This work is being undertaken alongside the Forestry Commission's wider biodiversity responsibilities towards priority species and non-woodland habitats. These will be reported on and reviewed within the framework of the England Biodiversity Strategy.

The Forestry Commission is contributing to the Defra Public Service Agreement target to bring 95% of SSSIs into favorable condition by 2010. The major part of this contribution relates to woodland SSSIs, but the Forestry Commission's target also includes work on its estate and with private landowners to improve 145 non-woodland SSSIs where "forestry" is cited as the principle reason for the site being in "unfavorable condition".

### **Role of Woodland in Water Catchments (para 38)**

**38(a) The Forestry Commission, Environment Agency, English Nature and Defra policy needs to identify more clearly the role of woodland in flood attenuation, reducing soil erosion and improving water quality.**

The Government agrees that it is necessary to identify more clearly the role of woodland in water catchments. Current work towards this aim includes an inter-departmental working group (including agencies and non-government organisations) and a joint strategy document: 'Wetlands, Land Use Change and Flood Management' has recently been produced.

There is a good case for native woodland making a positive contribution to soil erosion and to water quality. The Government will therefore consider ways in which these roles for woodland can be promoted and pursued in relevant policies. However, there is currently inadequate evidence to substantiate a major role for such woodland in flood attenuation, whether in upper catchments or in floodplains. The Government therefore believes it is premature to incorporate this role for woodland into policy. However, a number of multi-



agency projects have been initiated to examine the benefits referred to in this recommendation, as well as some potential problems for the water environment associated with woodland creation (see response to recommendation 38d below).

**38(b) The Forestry Commission needs to work with Defra and the Environment Agency to facilitate creation of extensive new native woodland on floodplains thereby making a major and sustainable contribution to delivery of the Water Framework Directive, as a positive response to recent major flood events and to assist in the development of adaptation strategies in relation to climate change.**

The Government agrees that the creation of floodplain woodland could deliver multiple public benefits, including biodiversity, buffering of watercourses, and landscape enhancement. However, as noted in the response to 38(a), the contribution to flood attenuation has yet to be fully evaluated.

Furthermore, the Government is not convinced that there is sufficient evidence to justify floodplain woodland playing a major role in the delivery of the Water Framework Directive. It should also be acknowledged that the presence of woodland in floodplains could have negative as well as positive impacts, including upstream flooding and problems for both water quality and supply. If some of the studies referred to below demonstrate a net positive role, then the Government will be ready to revise its position.

**38(c) The Forestry Commission and Defra should seek integration of agri-environment schemes and the England Woodland Grant Scheme to promote use of new native woodland to buffer headwater streams and ditches and a significant expansion of native woodland on floodplains and valley sites in sensitive catchments.**

Our commitment to integration of these schemes was stressed in the response to recommendation 18d. The details of the Higher Level Scheme are currently being developed with stakeholders, but our expectation is that some small-scale woodland creation – including riparian woodland – could be done under the Higher Level Scheme. More significant expansion of native woodland would continue to be under England Woodland Grant Scheme.

We will continue to encourage the creation of new native riparian woodland, mainly for its biodiversity and landscape values, but also for its role in improving the freshwater environment. However, identifying priorities for woodland creation under England Woodland Grant Scheme will largely be determined at a regional level, informed by the Regional Forestry Frameworks, and the Higher Level Scheme will also be subject to regional targeting.

The question of support for a ‘significant expansion of native woodland on floodplains’ is addressed by the response to recommendation 38(b). The justification for public funding for such woodland creation would need to be considered carefully, in relation to the precise public benefits provided and the evidence to support it. We must also recognise that there are

competing biodiversity aspirations for such floodplain land, particularly the re-creation of wet grassland.

**38(d) The Forestry Commission should commission research, pilot projects and demonstration sites, in conjunction with the statutory and voluntary nature conservation bodies, together with appropriate resources for action.**

The Government fully supports the need for further research into the relationship between woodland and the water environment. This subject has had a high priority for the Forestry Commission in recent years and will continue to do so. The Forestry Commission is increasing its research support in this area and is about to appoint a new forest hydrologist to focus on the role of forestry in flood prevention and mitigation. The Government also accepts the need for multi-agency approaches in R&D and demonstration projects. There are already a number of partnership research projects planned or under way on this subject, with diverse funding sources. We will be looking for further opportunities to fund high quality research projects in this area. The Government will ensure that the results of such research are fed into policy development.

**Short Rotation Coppice (para 44)**

**44(a) The Forestry Commission and Defra should ensure that their guidelines governing new SRC plantings ensure that the biodiversity benefits of existing land-uses are not prejudiced.**

The environmental impacts of converting to Short Rotation Coppice are assessed, and we would not support the establishment of Short Rotation Coppice on sites with a high existing value for biodiversity. However, we do not believe that Short Rotation Coppice should be seen as a general threat to biodiversity, and it will often represents a significant gain in comparison with a previous land uses. Several bird species of high conservation value such as bullfinch, reed bunting and song thrush have been associated with Short Rotation Coppice. The wider environmental benefits of such crops as a sustainable fuel also need to be considered.

We already assess the environmental impacts of planting. It is important not to forget the wider environmental benefits of bio-energy. Bio-diversity is not the only issue to be taken into account.

**44(b) The Forestry Commission should liaise with DEFRA over the need for further research into and information on the wider biodiversity impacts of SRC, including continuing study of some of the original establishment trials.**

Results to date have suggested that SRC will usually make a net positive contribution to biodiversity, particularly when planted on arable land. We recognise the value of long-term monitoring of the early trials and will liaise with partners over continuing this. We will also examine the need for other research to fill gaps in our knowledge.



**44(c) The Forestry Commission in association with Defra should seek to quantify and compare the potential biodiversity benefits and disbenefits of biomass production from SRC and from existing woodlands.**

A report, the 'Woodfuel Resource in Britain', has just been completed which quantifies the potential availability of wood fuel from traditional forestry, sawmill co-product, arboricultural arisings and short rotation coppice. To meet renewable energy targets we will need biomass from all these sources plus energy crops; it is not an 'either / or' choice. If we proceed with this research we would want to include comparisons with arable crops and set-aside as alternative land uses.

**44(d) Linked to the above, the Forestry Commission and Defra should better integrate and communicate information being gathered on existing woods, farm woodland and SRC.**

Both Defra and Forestry Commission participate in an inter-departmental research funders group which co-ordinates research on bio-energy. However, realisation of the importance of bio-energy has grown extremely rapidly and communication between the groups involved has not always been able to keep pace. We will continue take every opportunity to exchange information and ideas with colleagues across government.