



WPEP Team
Forestry Commission England
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Bristol
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Sent via email to: WPEP@forestry.gsi.gov.uk

26 September 2013

Dear Sir/Madam,

**Forestry Commission Consultation on Woodland Policy Enabling Programme:
Public Forest Estate**

1. The Campaign to Protect Rural England (CPRE) welcomes the opportunity to respond to the Forestry Commission's Woodland Policy Enabling Programme request for feedback. Our response focuses on the proposals for a new Public Forest Estate management body (PFEMB). CPRE campaigns for a beautiful and living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside is protected for now and future generations.
2. CPRE engaged in the work of the Independent Panel on Forestry and we were pleased to see that many of the issues and recommendations we submitted to the Panel were included. In particular, we called for i) an increase in woodland cover, including close to where people live ii) more access, particularly to privately owned woodland iii) a competition to identify a second, new National Forest iv) the Forest of Dean to become an AONB and v) more hedgerow trees. We also welcomed the Government's announcement that the Public Forest Estate would remain in public ownership.
3. CPRE believes that the new Public Forest Estate management body should have an overriding mission to realise the estate's full potential value to people and nature. Income generation should be considered as a means of enhancing public value, not an equal or competing objective.
4. We welcome the proposal that the PFEMB would have an overall duty to maintain the integrity of the estate. CPRE agrees that local views should be sought about small land acquisitions and disposals and we suggest that there should be a first refusal community right to buy if land is being sold by the PFEMB. We agree that in the case of proposals to acquire or dispose of more significant land assets, the PFEMB should be required to consult more widely, including with both the Guardians and the Secretary of State. We welcome recognition of the cumulative impact of disposals; this would need to be taken

into account when decisions are made and kept under review to ensure the integrity of the estate as a whole is maintained.

5. An important issue that is overlooked in the 'Towards a new Public Forest Estate management body' document is the consideration of landscape character. The impact of land disposals and acquisitions, as well as management techniques, will affect the character of an area, e.g. felling of trees on woodland edge could alter local landscape character, or the replanting of inappropriate species. CPRE believes that enhancement of landscape character should be one of key considerations when changes are made to the public forest estate. Natural England's pioneering work on this topic should provide a valuable starting point in this respect.
6. We agree that the new PFEMB will need a range of commercial freedoms to help generate income from the estate. Non forestry activities such as renewable energy and mineral extraction would be subject to the planning process but other measures should be put in place to ensure such activities do not undermine the value of the estate to people and nature. Ancient woodland and commercial forests obviously require different management approaches and commercial freedoms will need to be adapted to reflect this. For example, it is unlikely to be popular with the public if ancient woodland was damaged in pursuit of mineral extraction.
7. CPRE agrees that the Public Forest Estate should continue to be part funded by Government, in return for the public benefit it provides in areas such as access, recreation, biodiversity and landscape character and beauty. We would hope that this funding will help prevent decisions being made by the PFEMB to plug funding gaps by selling land or pursuing income generating schemes that would affect biodiversity, landscape or recreation opportunities.
8. In summary, CPRE supports the establishment of a new PFEMB and believes that with fine tuning, the new organisation can offer a secure future for the Public Forest Estate. In particular, it is critical that short term economic objectives do not compromise the long term environmental and social value of the estate.

Yours sincerely,



Emma Marrington
Senior Rural Policy Campaigner