

## **Wildlife and Countryside Link response to England's Trees, Woods and Forests: a consultation document August 2006**

Wildlife and Countryside Link is a coalition of the UK's major environmental non-governmental organisations concerned with the conservation, enjoyment and protection of wildlife, the countryside and the marine environment. Our members have the support of over eight million people in the UK.

This response is supported by the following organisations:

- Bat Conservation Trust
- Buglife – the Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Council for British Archaeology
- Ramblers' Association
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust

### **General comments**

Wildlife and Countryside Link (Link) welcomes the opportunity to respond to this consultation. We believe England's plantation forestry, native woods, scrub, wood pasture, parkland and trees have a vital role to play in the provision of environmental, social and economic goods. Unfortunately this is a fragmented resource of variable quality, much of which is in poor ecological condition and in need of appropriate management.

This isolation of woods, particularly ancient woods, coupled with the immobile nature of many of the species that inhabit them makes them particularly susceptible to the now inevitable effects of climate change. The cessation of traditional markets some 100 years ago has also meant that woods are no longer managed in the same way they were, so the more open nature of them has changed to a more closed canopy structure. This has brought with it a changing environment and challenges for many of the species associated with the open structure such as woodland birds<sup>1</sup>, bats, Lepidoptera<sup>2</sup> and plants<sup>3</sup>. As a result, many of the coppice and shrub associates, a number of which are identified in the UK Biodiversity Action Plan (UK BAP), have suffered declines or reductions in frequency. Other species have increased in number such as woodland fungi and lichens, many of which are also associated with the UK BAP, as our woodland resource has moved to a more mature state.

While some extinctions may be inevitable in the face of climate change, our priority for woods must be to ensure the woodland resource is made as sustainable as

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<sup>1</sup> See Defra Wild Bird Indicator:

<http://www.defra.gov.uk/environment/statistics/wildlife/research/download/wdbrds200603.pdf> & Repeat Woodland Bird Survey results: <http://www.forestry.gov.uk/forestry/INFD-6MWWL96>

<sup>2</sup> Fox, R. *et al.* (2006) *The state of Britain's larger moths*. Butterfly Conservation and Rothamsted Research, Wareham, Dorset and Fox, R. *et al.* *The state of Butterflies in Britain and Ireland*. Pisces Publications, Berkshire.

<sup>3</sup> Kirby K J *et al.* (2005) *Long term ecological change in British Woodland (1971-2001)*. English Nature Research Report, No 653.

possible, to support these assemblages of rare species. Priority actions must therefore be:

- protection of the resource (particularly Ancient Woodland)
- restoration of the resource (Planted Ancient Woodland Sites and other semi-natural habitats)
- targeted management of the resource
- expansion of the resource (to protect the small fragments from damaging edge effects)
- and increased efforts to make the wider countryside more sympathetic to species dispersal.

All these priorities are highlighted, and targets produced for them, in the England native woodland Habitat Action Plan which Link supports, and to which some Link members have made a direct contribution through the England Woodland Biodiversity Group.

Woods are dynamic habitats and therefore must be able to adapt and provide species with the space they need to survive and evolve in the face of change. The protection and restoration of all semi-natural habitats in the landscape must therefore be considered a priority. Ancient woodlands and sites where many ancient woodland characteristics still exist (Planted Ancient Woodland Sites or PAWS) are especially valuable as they represent the last vestiges of habitat which has direct links to pre-human landscapes. In a woodland context this means protecting ancient woodland and restoring all Planted Ancient Woodland Sites (PAWS) as the only way of increasing ancient woodland with semi-natural characteristics, and providing greater ecological coherence to species dependent on this habitat. These priorities, together with woodland creation are necessary in order to deliver on the UK Biodiversity Action Plan.

Woodland also makes hugely significant contribution to landscape character, whether a landscape is heavily wooded or very open, and woods prominent or rare punctuation. The role of woodland in the history and cultural heritage of the English countryside is immense and is inseparable from the wildlife that inhabits it and the traditional management practices which have shaped woods over millennia. Often the interrelationship between woodland and open farmland is vital, both in terms of habitat and farming practice. The extent and quality of woodlands is a key element in the annual Countryside Quality Counts measurement of change in landscape character undertaken by the Countryside Agency.

Link also recognises that woods play a key role in achieving a more sustainable wider landscape, which in turn allows public access for recreational purposes, thus contributing to the health agenda. This will be particularly significant in the successful establishment of new communities, whether through urban regeneration, urban extensions or entirely new settlements as envisaged for the Growth Areas in the wider South East and elsewhere.

The role of extensive tree cover in protecting and managing natural resources will become increasingly significant. To be effective in this role, woodlands not only need to be protected and in some cases planted, but also managed in the long term.

Link would like to acknowledge the large strides made by the Forestry Commission in the last decade towards the implementation of an inclusive, multipurpose forestry strategy and hopes that this progress can be built on in the next decade.

For this reason, Link hopes that the revised England Forestry Strategy (EFS) will retain elements of the original strategy's purpose or vision for woods and forests, the links to which need to be made clearly. The revised strategy should recognise that much has changed since the publication of the 1998 strategy, for example climate change has become a much more important issue. The role of extensive semi-natural woodland cover in ensuring the resilience of habitats to climatic extremes is increasingly recognised. Wood fuel has become a more economically viable option, and therefore the revised EFS will need to drive enhanced biodiversity work in public and private sector woodland, and ensure that England meets its national, UK, EU and international biodiversity commitments. A strong and positive Government-wide vision for the future of England's trees, woods and forests is a prerequisite for the revised strategy.

Defra must ensure that international commitments on sustainable forestry are properly implemented via the England Forestry Strategy, the Rural Development Programme for England (2007-2013) and management of the National Forest Estate via the Forestry Commission England Corporate Plan. We would also like to note the importance of the UK Forestry Standard in achieving many of the aims of the revised strategy.

While Link accepts that a wholesale return to intensive management on biodiversity grounds across England is not economically sustainable, we have concerns about the changing nature of our woods and about the effects this is having on those species dependent on open woodland systems. Link believes that focused and targeted management of woodland will be necessary, where it can be sustained, in certain woods and certain areas where keystone or flagship species exist. This applies to management for open-ground species as well as species requiring mature woodland or dead wood. Appropriate woodland management in combination with targeted expansion and buffering of what remains of the native and ancient woodland resource is essential to creating conditions for the survival of key species, preventing damaging edge effects and providing new area of suitable habitat for the future. Such action will also greatly enhance the distinctiveness of different woodland types, of which there are many (Rackham et al) and their appreciation and enjoyment by the public.

The revised strategy also has a significant role to play in meeting other BAP targets by restoring important open ground habitats. These include lowland heathland, and semi-natural grassland that is currently non-native plantation forestry and neighbouring designated non-woodland sites adversely impacted by it.

As well as restoring open ground habitats, we believe that the revised strategy must give special priority to the restoration of PAWS currently planted with non-native forestry plantations and the restructuring of key existing forestry plantations for priority species. The EFS has an important role to play in the management of woodland habitats, for example through the delivery of UK Biodiversity Action Plan HAP targets.

The revised EFS needs to be backed up by effective delivery mechanisms for key public benefits, in particular biodiversity, archaeology, landscape conservation and access and public health benefits. It is important that the Rural Development Programme for England (2007-2013) (the next ERDP) continues to support current government forestry policy for sustainable multi-benefit forest management. We welcome the link between the EFS and the delivery of the England Biodiversity Strategy.

Whilst overall Link supports the scope of the revised strategy as proposed by the consultation document, we are concerned that the consultation document does not currently have sufficient focus on the importance of veteran trees. These receive little mention in the consultation, and Link believes that the revised EFS must have a greater focus on veteran trees in order to redress this balance.

Link also has a number of concerns regarding the use of woodlands for bioenergy, with little mention of the need to ensure this is carried out in a sustainable manner, avoiding adverse effects on the environment and landscape. Link has recently commissioned research to look into these effects, and in the meantime we would like to see the revised strategy encouraging the use of woodlands for bioenergy only if can be undertaken in an environmentally sensitive and sustainable manner, for example by encouraging the management of existing woodland rather than creating new woodlands solely for this purpose. Sudden changes in woodland management after many years neglect need to be carefully planned in order not to do inadvertent damage to the semi-natural and ancient features that survive. To this end, any new intensification of woodlands for fuel use should be subject to full-scale Environmental Impact Assessment.

Although we are disappointed that the actual draft strategy will not be consulted upon (as stated on page 32, paragraph 84), we understand that through our representation on the EFS steering group Link will have the opportunity to see a draft of the EFS, which we would strongly support. Link also welcomes the opportunity to contribute to the development of the EFS implementation plan. In addition, Link has provided comments throughout the process developing the consultation document, through our representation on the England Forestry Forum.

## **Response to Consultation Questions**

### **The role of Government**

#### **Question 1 (page 12)**

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

Link supports the list of principles in paragraph 23 (Page 12), but believes it is essential that reference to the England Biodiversity Strategy and the UK Biodiversity Action Plan be included under the 'national' category. Far too little attention is paid to the damaging effects on the indigenous timber industry of unchecked imports from unsustainable sources.

#### **Question 2 (page 13)**

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

Link does not believe that regulation presents an unrealistic barrier to sustainable management. It is our opinion that the UK Forestry Standard must be the bare minimum environmental cross compliance standard for all woodland planting, management and felling, in the public and private sectors, and by all land managers. Link believes that lowering the bar of existing regulation will undermine the industry by reducing environmental quality and delivery of public benefits, which could in turn result in a loss of public support and thereby markets.

**Question 3** (page 13)

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

Link believes that public procurement should move towards increased use of sustainably managed timber and wood-products.

Paragraph 25 (page 13) of the consultation document mentions the UK Woodland Assurance Scheme (UKWAS) purely in the context of timber chain of custody and procurement. We believe that the revised strategy also needs to recognise the value of UKWAS certification in encouraging the high quality management of native woods based upon ecological survey and management planning. UKWAS certification could drive the management of native woods to meet UK Biodiversity Action Plan targets, which could include non-intervention with monitoring, as well as removal and sale of produce.

We note that paragraph 25 (page 13) of the consultation document makes no mention of the UK Forestry Standard, which implements international sustainable forest management agreements (MCPFE)<sup>4</sup>, and the EU Birds and Habitats Directives (including SAC and SPA Natura 2000 sites, and priority species and habitats). Link believes these should be mentioned in the revised strategy.

**Question 4** (page 14)

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

It is Link's opinion that the seven types of intervention do express the Government's role, with the following provisos:

- Intervention for research and capacity building should include requirements regarding survey and information. Link would like to see more monitoring on capacity building and support for baseline surveys of woodland species, many of which are currently under-recorded, together with support for monitoring these species which would in turn feed into the BAP process.
- Environmental, landscape character and archaeological information is required before land is planted to better understand the nature and extent of ancient woodland (for example the revision of the inventory following the Wealden district Council).
- Information about best planning and implementation of woodland management is also required.

These will all require extra streams of Government funding, which Link believes is needed in order to ensure the delivery of existing Government policy and guidance.

**Question 5** (page 15)

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

Link has a number of concerns regarding the Regional Forestry and Woodland Strategies, and Regional Implementation Plans (RIPs) of the next ERDP and how these implement national biodiversity priorities. Although we have been impressed by how much the Regional Forestry Frameworks (RFFs) reflect national priorities

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<sup>4</sup> See: <http://www.mcpfe.org/resolutions/helsinki>

including biodiversity, Link would like to see the inclusion of complementary text in the revised EFS which clearly spells out the relationship between the two and recognises the function of each. We also have concerns about how the RFFs and their strategies are going to fit into and/or connect with the next ERDP RIPs and the England Woodland Grant Scheme (EWGS). Link would therefore like to see the linkage between RFFs and RIPs set out more clearly and believe it is crucial that RIPs reflect the RFFs fully. Link believes that the revised EFS should give some strategic guidance on what should be delivered through the RFFs, whilst the RFFs should give guidance on the achievability of policy at a regional scale.

The importance of regional forestry to Regional Spatial Strategies and Regional Economic Strategies should be clearly stated and these links pursued by both forestry, planning and economic champions.

It is unclear how Forestry Commission Regional Advisory Committees are going to operate with the RIP steering groups – FC RACs have a legal duty for quality control of forestry grant schemes (including regional targeted parts of EWGS).

Link has a general concern that national biodiversity and sustainable forest management priorities, standards and duties are under threat from being squeezed further into agriculture in the ERDP, and the regional targeting of ERDP funding.

Despite the assurances contained within the consultation document (page 13, paragraph 26), it seems likely that the UK Forestry Standard will be further reduced in application under the next ERDP because much of the woodland planting and management will be delivered through ELS and HLS schemes which are not subject to the EFS. This is an undesirable reduction in the environmental regulation of woodland planting and management stemming from the EFS and its delivery mechanisms. Link believes that it could result in the creation of woodland of low intrinsic biodiversity value, or poorly located planting on non-woodland habitats of high biodiversity value, neither of which meet England's biodiversity or sustainable forest management commitments as set out:

- in the England Biodiversity Strategy;
- for UK Biodiversity Action Plan priority woodland habitats and woodland species – including lowland heathland and semi-natural grasslands;
- in respect to the EU Gothenburg 2010 biodiversity target (an EU Rural Development Regulation objective);
- for EU priority species and habitats under the EU Birds and Habitats Directives;
- for sustainable forestry commitments under the Ministerial Conference for Protection of Forests in Europe (an EU Rural Development Regulation objective).

## **Government's priorities for trees, woods and forests in England**

### ***Environmental sustainability & Climate change***

**Question 6** (page 18)

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

Link agrees that carbon sequestration must not be a significant driver for national forestry policy. We are uncertain whether the environmental benefits of carbon sequestration / offset forestry, would outweigh the costs in terms of habitat loss, loss of soils which perform carbon sequestration more effectively, and poor quality habitat creation with low biodiversity value.

Link is concerned that:

- emphasis on carbon sequestration or indeed on carbon offsets secured through tree planting could mask discussion of genuine emissions reductions, and adaptation to climate change;
- Sequestration forestry objectives could conflict with biodiversity objectives including efforts to restore open ground habitats, such as lowland semi-natural grassland and heathland;
- Environmental Impact Assessments should pick up issues of habitat loss and consequences for species.

However, Link does agree that well planned and targeted woodland creation is necessary to deliver the linking up of existing high value woodlands to reduce isolation and fragmentation and to improve the resilience of woodlands to climate change.

**Question 7** (page 18)

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

Not relevant

**Question 8** (page 19)

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

No, Link does not consider there to be adequate opportunities to promote English timber as an environmentally friendly material. Whilst 'Wood for Good' and 'Naturally Wood' have helped raise the profile of timber, we believe that a much more sustained, wide reaching promotion based upon current practical examples, for example where timber harvesting has directly benefited the biodiversity of a woodland, is needed. Link believes that public bodies and Government departments need to take more of a lead on this issue, promoting success stories, such as the river stabilisation work at Rye, carried out by the Environment Agency using local sweet chestnut.

Link considers there to currently be a lack of imagination in the marketing, labelling and certification of timber. There remains a heavy reliance on imports, and it is our belief that the utilisation of local Forest Stewardship Council certified material from UKWAS certified woods would be beneficial to our woodland biodiversity, to reduce carbon emissions by preventing the increase in 'timber miles'. The effective enforcement of restrictions on timber from unsustainable sources overseas is crucial both to the contribution of UK forestry policy to the rest of the world and the competitiveness of our own industry.

**Question 9** (page 19)

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

**i) what, if any, specific support mechanisms are needed?**

Further grants need to be effective at making existing English woodlands economic to manage in an environmentally sustainable manner. The main barriers are the chicken and egg situation between suppliers and end users and supply chain issues. Suppliers of wood chip for example, will not invest if there are no end users and end users won't install if they can't get a fuel supply. Government departments, local authorities and public bodies therefore need to take a leadership role in specification and procurement, to provide private end users with confidence, and to facilitate the development of supply chains. If the Government's response to the Ben Gill Biomass Task Force report are implemented, then this will give the industry a major boost, for example capital grants for boiler installation. The Government therefore needs to take the lead together with local authorities using PPS22 (on Renewable Energy) more effectively to promote wood fuel in new development. In order to achieve this grant schemes to support woodfuel need to be more user friendly, easier to apply for and with decisions made quickly if the private sector is to be encouraged.

**ii) Are there any barriers to progress?**

Yes – these include high capital costs, high start up costs for wood fuel, and the high cost of harvesting versus new planting.

**Question 10** (page 19)

**As owners respond to new markets for woodland products, will the existing regulatory framework offer adequate protection against possible adverse impacts (on woodlands and the wider environment) of large-scale reintroduction of management in existing woodlands or of new planting?**

Link does not believe that the existing regulatory framework offers adequate protection, as the UK Forestry Standard is not fully implemented across all woodland activity, currently or in the next ERDP. The UK Forestry Standard must be the bare minimum environmental cross compliance standard for all woodland planting, management and felling, in the public and private sectors, and by all land managers.

Link therefore believes that the UK Forestry Standard must be applied to all entry and higher level funded woodland creation, improvement and management, not just in grants administered by Forestry Commission England, but by all of the Defra family. The 2007-13 EC Rural Development Regulation (RDR) requires the 'sustainable use of forestry land' under Article 36b, in accordance with the MCPFE agreements<sup>5</sup>, which includes the 'Helsinki Principles' of sustainable forest management. The UK implemented the 1993 MCPFE Helsinki Principles<sup>6</sup> via the 1998/2004 UK Forestry Standard<sup>7</sup>. This will ensure that the next ERDP complies with the RDR.

The revised EFS and its delivery mechanisms need to deliver on the UK Government's commitment at the 2002 World Summit on Sustainable Development commitment<sup>8</sup> to increase the area of England's woodland certified under the UK Woodland Assurance Scheme (UKWAS). Beyond retaining the English National Forest Estate's UKWAS certification, we would like to see increased UKWAS uptake by native woodland owners, both in the private sector, local authorities and public bodies.

<sup>5</sup> See <http://www.mcpfe.org/resolutions/> and RDR paragraph 32, p4

<sup>6</sup> See <http://www.mcpfe.org/resolutions/helsinki>

<sup>7</sup> See [http://www.forestry.gov.uk/pdf/fcfc001.pdf/\\$FILE/fcfc001.pdf](http://www.forestry.gov.uk/pdf/fcfc001.pdf/$FILE/fcfc001.pdf)

<sup>8</sup> See: [www.ukforestpartnership.org.uk](http://www.ukforestpartnership.org.uk)

**Will it do so without creating unnecessary barriers for woodland owners and managers competing in these markets?**

Link believes that the UK Forestry Standard does not create unnecessary barriers for woodland owners and managers, and beyond the UK Forestry Standard, certification to UKWAS may permit market accessibility and aid the positive marketing of UK wood products. In effect, the imaginative marketing of timber that meets the UK Woodland Assurance Scheme could aid the creation of a 'high value' green product from English woodland.

**Question 11** (page 20)

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

Link believes that the best way to ensure that woodland biodiversity is able to respond to the challenge of climate change is to protect, restore and create priority woodland habitats to ensure our woods are able to function ecologically across the landscape and are resilient in the face of change. This requires a firm commitment to buffer and expand existing sites, restore PAWS and undertake targeted management for the conservation of priority species.

Link believes that woodland management must adapt to ensure our woodland continues to deliver benefits in light of climate change. Link welcomes the statement in paragraph 44 (page 20) of the consultation document on adaptation and in addition to the measures proposed (such as buffering from fertiliser and spray drift, and reducing fragmentation) and supports the case for preventing further fragmentation.

Adaptation must focus upon natural processes and providing species with the space they need to survive and evolve in the face of change. This means that key actions including protecting ancient woodland and restoring PAWS, and safeguarding and enhancing UKBAP priority species and habitats. Emphasis should therefore also be placed on buffering and expansion of sites and creation of more robust landscape in order to enable ecological connectivity rather than simple linkage. Link believes that woodland has an important role in the creation of robust landscapes, to ensure that it is able to respond to the challenges raised as a result of climate change and ensure our whole landscape is more ecologically functional, so that species living in it are able to survive, adapt and evolve. This will also ensure that woodland can play an effective part in the protection of soil and water quality.

***Natural resource protection and management***

**Question 12** (page 20)

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

Link believes that any plans for flood prevention woodland creation must be properly located to enhance, and not harm, important wetland habitats, species and designated sites (SSSI, NNR, SAC, SPA and Ramsar), and meet UK Biodiversity Action Plan wet woodland targets. Given the Water Framework Directive must be fully implemented by 2015 we need to move quickly in terms of understanding how woodland in the UK can help deliver on water quality, quantity and the velocity of its movement.

Link believes that the national priority should be to understand better the wider public benefits of woodland and how these can best be targeted

## ***Biodiversity***

### **Question 13 (page 22)**

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

The revised EFS needs to drive enhanced biodiversity work in public and private sector woodland, meeting England's national, UK, EU and international biodiversity commitments and therefore close linkage with the England Biodiversity Strategy is key. However, other Government policy areas such as regional strategies, local wood fuel and access policies which value well-managed woodland for health benefits could also contribute, for example biofuels and coppice charcoal examples from the next ERDP. Woodland can deliver on a wide range of other Government agendas.

For example, recent research indicates that woodland is able to deliver on 10 of the 20 Government sustainable development indicators<sup>9</sup>. This means recognising the ability of woodland biodiversity to contribute to other agendas such as health, outdoor learning, social inclusion etc. In addition Section 74 of the CROW Act and Clause 40 of the NERC Act now require all public bodies to have regard to the purpose of conserving biodiversity and detailed guidance on this duty is currently being prepared. By exercising their biodiversity duty in respect to the CROW and NERC Acts, public bodies should become more aware of the wider public benefits which will follow.

The revised strategy must also drive the restructuring of key existing forestry plantations for priority species, and promote the restoration of PAWS. This includes restoring important open ground habitats, such as lowland heathland and semi-natural grassland, that is currently non-native plantation forestry, or neighbouring designated non-woodland sites adversely impacted by it; and improving the biodiversity condition of England's native woods both to meet UK Biodiversity Action Plan targets and designated site condition and to begin to address the decline in species that occur in woodland habitats such as butterflies, moths, bats and woodland birds<sup>10</sup>. This is particularly important as remnant woodland harbours many species across the taxa that cannot survive elsewhere. In order to better report on the status of our woodlands Government needs to encourage and support monitoring of key biodiversity species and the development of indicators similar to the woodland bird index for other sensitive, easily monitored species, such as butterflies and bats.

Link would like to see the consultation document contain much stronger and prominent reference to the importance of veteran trees, the species dependent upon them as well as their importance in terms of landscape history and cultural heritage. These receive little mention in the consultation, and Link believes that the revised EFS must have a greater focus on veteran trees in order to redress this balance.

Other key areas are as follows:

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<sup>9</sup> Woodland Trust/ERM (2005) Making woodland count; its contribution to our quality of life

<sup>10</sup> See Defra Wild Bird Indicator:

<http://www.defra.gov.uk/environment/statistics/wildlife/research/download/wdbrds200603.pdf> & Repeat Woodland Bird Survey results: <http://www.forestry.gov.uk/forestry/INFD-6MWL96>

*Biomass* - with the increasing focus on renewable energy there is no surprise that wood fuel is receiving increased attention. We welcome this and can see a range of potential benefits that this market could deliver for biodiversity. This includes PAWS restoration, restoration of open habitats and Short Rotation Coppice and Short Rotation Forestry crops that could buffer and extend important habitat if sited and managed sensitively. The UK Forestry Standard must be applied to all forestry biomass planting, management and felling, by all of the Defra family. It is also possible that the biomass markets could see a returned management to many of our existing ancient woodlands. Provided this is done in an ecologically and temporally sustainable way there may also be benefits here. However what is particularly attractive about the potential of biomass, outwith the potential benefits to biodiversity and given the correct checks and balances are in place, is that this would be the market undertaking works which would thereby take pressure off increasingly scarce public funds for achieving biodiversity outcomes.

*Quality of life* - increased emphasis on the quality of life and recent research undertaken in terms of levels of access to woodland<sup>11</sup> shows that there is insufficient woodland for people. Increasing the amount of woodland in areas devoid of this resource would improve woodland biodiversity as it would reduce the fragmentation of woodland in the landscape. The Woodland Bird Index, and addressing woodland bird declines, is a key indicator and PSA target that the revised EFS must address.

*Water and flooding* - We believe there is huge potential for woodland biodiversity in this policy area. Greater understanding of how floodplains could be used more sustainably would enable the establishment of areas of UK BAP priority wet woodland, and enhancement of existing wet woods, as well as other wetland habitats. Increased understanding of how woodland effects run off in upper catchments is also likely to change the way we manage our upland forests and may also give opportunity for large scale woodland creation in some areas.

Link believes that any plans for flood prevention woodland creation must be properly located to enhance, and not harm, important wetland habitats, species and designated sites (SSSI, NNR, SAC, SPA and Ramsar), and meet UK BAP wet woodland targets.

*Agriculture* - We believe there is enormous potential for agriculture to improve the biodiversity potential of woods and trees. Agri-environment scheme funding now includes a full suite of woodland options enabling farmers to create, restore and manage woods and protect in-field trees. Furthermore cross-compliance provides an as yet untapped opportunity to increase the resilience of existing woods. Through imaginative use, and as recently adopted by Scotland, scrubby habitats adjacent to existing sites could be created to buffer and expand them. As long as these new habitats do not become woodland, but are essentially managed as open scrubby treescapes, potentially grazed, or rotationally cut, the owners should still be eligible for single payment. This would take pressure of the need for the next ERDP to create new woods to buffer existing sites and pay huge profit foregone payments to farmers for loss of SPS eligibility.

**Question 14** (page 22)

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

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<sup>11</sup> See [www.woodsforpeople.info](http://www.woodsforpeople.info)

The revised strategy must drive the restructuring of key existing forestry plantations for priority species, and promote the restoration of ancient woodland sites currently planted with non-native forestry plantations and ensure that our native woodlands are managed. Link would also encourage Government support for the development and publication of guidance about management, research into management practices, funding for baseline survey and GIS modelling of species/habitat association and hence predicted distribution to better enable us to target limited resources into managing the best woodlands and bring those in poor quality but with good potential up to high quality.

Defra, Forestry Commission England and Natural England need to implement the soon to be revised Biodiversity Action Plan for woodlands and woodland species to meet commitments under the UK Biodiversity Action Plan, England Biodiversity Strategy, and EU Habitats & Birds Directives. In order to achieve these key open-ground sites need to be identified. This requires clear biodiversity targets in revised Forestry Commission England Forest District Strategic plans, backed up by suitable budgets to ensure effective, targeted delivery on the ground for priority biodiversity. This includes action for woodland habitats and species such as pearl-bordered fritillary and non-woodland species and habitats, such as lowland heathland, nightjar and woodlark.

The revised EFS must include a commitment to follow-up research to investigate the causes of decline in many species which depend on deciduous woodland habitat, such as birds, bats, butterflies and moths, with subsequent appropriately targeted conservation action.

There also needs to be a linked target for any PAWS receiving forestry grants, or other state funds, having been surveyed and an appropriate restoration plan produced to secure and enhance surviving ancient woodland communities.

We are keen to see PAWS restored, but also subsequently managed to benefit priority species and create structure in the restored woodland. Some open woodland species e.g. the pearl-bordered fritillary, survives in some plantations purely because they are managed as such - restoration to native woodland would be positive, but not if it resulted in dark, totally unmanaged woodland.

Link also believes that the revised EFS needs to include a commitment to maintain the English National Forest Estate's UKWAS certification.

We are concerned that the neither the current forestry strategy, nor the proposed strategy addresses the current development pressures and actual development on the National Forest Estate, for example for windfarms<sup>12</sup> and housing. We are also concerned that the state forest is being considered by government as a land bank for development, outwith the public benefit considerations of the England Forestry Strategy and England Biodiversity Strategy.

Link believes that Defra should use the EFS to make the case for cross-Government delivery of wider benefits and in particular the value for money provided by woodlands in delivering a range of other Government agendas.

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<sup>12</sup> New guidelines on wind turbines and impact assessment for bats due to be adopted at the Eurobats MOP in September will state the following "Wind turbines should as a rule not be installed within woodlands, nor at a distance less than 200 m due to the risk that this type of siting implies for all bats."

One of the most important roles that Government can perform is to ensure cross-departmental Government agreement and sign up to these aims. Without the full cooperation of other departments Defra and the FC will never be able to fully achieve their targets.

It is vital that Government take an increasingly joined up and more holistic approach to policy delivery. Without this we will fail. For example there is no point in spending lots of money on managing a SSSI to try and get it into favourable condition if major drivers of change in the surrounding landscape are not addressed. For example issues such as diffuse pollution and intensive management of the landscape are far more important factors in determining the long-term biodiversity value of a woodland than are issues in the site itself.

**Question 15** (page 22)

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

Link whole heartedly agrees and supports the restoration of priority open habitats such as heathland and grassland. Link believes that Defra, Forestry Commission England and Natural England should develop a national action plan for priority open-ground habitat restoration to meet commitments under the UK Biodiversity Action Plan, England Biodiversity Strategy, EU Habitats & Birds Directives, and Ramsar. This should include:

- identifying key open-ground sites & habitats for restoration in accordance with the following criteria:
  - Listed as a UK Biodiversity Action Plan priority open-ground habitat with restoration targets;
  - Direct benefit to England Biodiversity Strategy species and habitats, UK BAP priority species, or be a key UK Biodiversity Action Plan (UK BAP) or Priority/Annex 1 habitats under the EU Habitats Directive;
  - Will enhance the biological condition of designated sites, and adjacent areas<sup>13</sup> – SSSI, NNR, SAC, SPA, Ramsar;
  - Restoration potential – presence of key remnant features, and technical ability to improve condition;
  - Scale of restoration must be adequate and produce viable habitat linkages to existing areas/networks of target habitats.
- ‘opportunity mapping’ across the whole of the English National Forest Estate to determine the extent of important open ground habitats
- ensuring that priority open-ground habitats are not restocked.
- outcome targets for priority open-ground habitats, species and designated sites should be incorporated into the FC England biodiversity programme.
- Survey and impact assessment of forests targeted for removal to make way for habitat restoration should be carried out. Some plantation woodlands, even non-natives, do provide habitat for some species. For example serotine bats have been found to use rides in plantation forests for foraging in Surrey (further research is underway), and Natterer’s bats have been found roosting and foraging within Corsican pine plantations in Scotland<sup>14</sup>. Care should be taken that they are not displaced

<sup>13</sup> This includes for ‘woodland’ & ‘non-woodland’ designated sites, species & habitats; such as improving botanical SACs & SSSIs that are surrounded by forestry, e.g. by pulling back forest edges to expand species rich grassland.

<sup>14</sup> Mortimer, G. (2005). Natterer’s bat *Myotis nattereri* and commercial coniferous plantations, *Abstracts of the Xth European Bat Research Symposium*, (PhD research, paper pending).

This requires clear biodiversity targets in revised Forestry Commission England Forest District Strategic plans, backed up by suitable budgets to ensure effective, targeted delivery on the ground for priority biodiversity.

## ***Landscape***

**Question 16** (page 23)

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

Planning policy in particular has a crucial role to play here. Similarly, linkage with agricultural policy is key with the RIPs having an important role to play. Recognition of the importance of woodland cover of all types, but particularly ancient woods, PAWS and patterns of veteran trees to the quality of landscapes and their cultural significance should prevail through spatial planning, natural resource and recreational policies. Regional Spatial Strategies, Regional Economic Strategies and Local Development Frameworks all have a strategic role in ensuring the woodland and tree resource of a region or district is recognised, understood, protected and enhanced where possible.

New settlements, whether urban regeneration, urban fringe extensions or entirely new sites in greenfield locations all require integration with existing woodlands and their best management as well as where appropriate, the extension of carefully planned new woodland cover. Wherever possible new woodland planting associated with new settlements should be integrated with existing valuable landscapes and habitats as well as continued farming activity.

**Question 17** (page 23)

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

The Government can make it a core obligation of all planning, regeneration and economic partners to integrate well-informed and well-planned woodland and tree policies with the work of the Forestry Commission, Natural England and all regional and local forestry partners, including NGOs. The opportunities include further guidance by circular on planning policies, especially with reference to PPS7, PPS9 and PPSs 11 and 12.

## ***Social sustainability***

### **Public access to woodlands**

**Question 18** (page 24)

**Do you agree that:**

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

Link agrees that public access should remain a key deliverable in multi-purpose forestry and that it is a national priority. Link believes that woods have the ability to deliver a wide range of benefits that, when appropriately planned, managed and zoned for formal activities, can deliver across a wide range of objectives including providing health benefits. Link believes that there should be a national objective of

increasing access to woods allied to regional and local targets. An example of such targets has recently been published by the Woodland Trust<sup>15</sup>.

**Question 19** (page 24)

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

We believe that greater use of targeting is required here in order to address any initial deficit of access, either through new woodland creation or the provision of greater incentives for the opening up of woods which are not currently open to the public. This should be accompanied by attention to the quality of the experience offered which will vary according to the character of the site. For example in an urban or peri-urban setting, this will mean action to make woods more welcoming and less threatening. This action should ensure that the biodiversity and landscape of the area is not diminished, and the public benefit retained, through the use of minimal clearance and information points to provide visitors with further information on the site.

**Question 20** (page 24)

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

Link organisations own a significant proportion of woodlands and hold many public events that aim to inspire and would hope to work closely with FC to continue to provide this public good.

As such we believe the first priority for social inclusion in relation to woodland access and recreation should be to ensure that communities have access to woodland in the first place and to address this through the Woodland access standard.

Where there is a need for new woods to be created, communities should be involved as much as possible in the design and planting of new sites. Woodland activities such as tree planting, walking and craft training can provide a forum for people of all ages and cultural backgrounds from local communities to come together and learn about, enjoy and improve their local environment, for example public bat walks lead by local experts.

Social inclusion policy should also seek to build on existing examples of good practice. For example the virtual Community Woodland Network has identified more than 200 groups already in existence in England where there is evidence of communities pulling together through their shared focus and sense of responsibility for woodland.<sup>16</sup>

## ***Health & Recreation***

**Question 21** (page 25)

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

Public access is a key deliverable in multi-purpose forestry and is a national priority, however, there needs to be appropriate planning, management and zoning for formal

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<sup>15</sup> The Woodland Trust (2004), *Space for People: Targeting action for woodland access.* ([www.woodland-trust.org.uk/publications](http://www.woodland-trust.org.uk/publications))

<sup>16</sup> See <http://www.woodland-trust.org.uk/communitywoodlandnetwork/>

activities, and informal access under CROW Act where any disturbance or threat may occur to wildlife.

The overwhelming body of evidence which demonstrates the strong link between the local environment and human health means that this should be a priority and we support the aspiration that 'the central contribution of the new strategy should be to ensure that suitable, accessible woodlands contribute to a network of open spaces available for everyone'. The facilities should however be appropriate to the site and take account of impact on other objectives for the site such as the enhancement of biodiversity.

The Health Woodland Improvement Grant which has been piloted in the West Midlands is an excellent example of how woodland can effectively engage with the health agenda and enhance its contribution<sup>17</sup>.

It is important to also recognise (which we believe the consultation document does not currently do) that the health benefits of trees and woods are not purely physical and that significant mental health benefits arise from their presence. The National Urban Forestry Unit report 'Trees Matter' provides an excellent summary of the benefits of trees and woods in towns and cities. It notes the role of stress as a highly significant factor in the health of urban Britain and points to the 'ample anecdotal evidence that people feel better in green, leafy surroundings and many seek solace amongst trees and woodland. Urban residents suffering from stress have been known to experience less anger, sadness and insecurity when viewing well trees surroundings as opposed to landscapes devoid of greenery'<sup>18</sup>.

### ***Trees within the green infrastructure***

#### **Question 22** (page 26)

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

Link believes that the role of trees and woods should be promoted in our towns and cities. Where this involves the creation of new areas this must be carefully planned and zoned so that any woodland creation does not occur on open grassland or heathland areas, is sensitively landscaped and that the planning process involves the local community. Link believes that encouraging the creative retention of woodland during urban development is (and will continue to be) key, so that residents have access to woodland close to their homes, thus providing a better environment.

#### **Question 23** (page 26)

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

See the answer to question 22 above.

#### **Question 24** (page 26)

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

<sup>17</sup> For further information see <http://www.forestry.gov.uk/forestry/infd-5mrk6g>

<sup>18</sup> National Urban Forestry Unit (1998) Trees Matter, p.6

Link believes that the retention of woodlands around towns and cities provides residents with additional physical and mental benefits, by providing more pleasant routes for leisure activities and alternate routes to roads. It is important that the creation and management of green infrastructure includes priority biodiversity as an objective, so that wildlife enhancement opportunities are maximised.

As a result Link believes that the provision of green infrastructure should be fully integrated into development proposals and not as an afterthought and the woodland sector must be vocal in putting forward this view. As well as the range of social benefits provided ranging from shade provision to pollution absorption and recreational facilities, trees and woods are a critical component of green infrastructure strategies because of the biodiversity value they are able to bring which is so valued by the public from green spaces.

**Question 25** (page 26)

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

Link is generally supportive of the approach as set out in the consultation document. Trees and woods have a critical role to play in the provision of rural, urban and peri-urban green infrastructure. Research carried out for the Woodland Trust shows that woodland is able to deliver on 10 of the 20 headline Government indicators of sustainable development and this means that the extent of its contribution to quality of life in local areas should be fully utilised. This covers both the creation of new woods and the management of the existing resource.

We believe that the revised EFS should make more of the educational benefits of trees and woods and that this deserves a section in its own right rather than being simply a paragraph contained within the green infrastructure section, as currently portrayed in the consultation document. The outdoor learning agenda is a rapidly developing one following the Government's manifesto commitment in this area at the last election. Well-managed woods have an especially strong role to play in offering both children and adults an experience of nature. For example, a study for the South West of England estimated the annual expenditure on day trips and residential courses for woodland education and hence the financial value of woodland assets for education to be in the region of 32.26million annually. Based on this, a total annual value of £23.6m was estimated for the whole of England. This is approximately £372 per 100 school children<sup>19</sup>.

***Managing urban trees***

**Question 26** (page 27)

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

Link considers the situation at present to be too patchy, with resources often very limited, although some Local Authorities have highly knowledgeable tree officers. We believe that there is a need for a tree and woodland officer to be in place in all Local Authorities.

Another key priority is also the need for more specialist tree workers, such as arboriculturalists and tree surgeons. At present there is too much work taking place

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<sup>19</sup> South West RDA and FC, South West Woodland and Forestry Strategic Economic Study, 2002

which lacks an adequate knowledge of the resource and modern ways of looking at them. Trees are often unnecessarily and hastily felled in urban areas when an alternative might have been possible. This felling sadly results in the loss of valuable resources for wildlife (e.g. bat roosts or dead wood for invertebrates) and in the loss of valuable resources for people (e.g. aesthetic value).

In many cases there are inadequate resources to effectively implement and enforce the Tree Preservation Order legislation and relevant policies intended to protect and conserve the urban tree stock and its wildlife. The Tree Preservation Order legislation was reviewed in 1994, but key recommendations have not been implemented. A recent government 'Householder's Consents Review' report similarly concluded that the recommendations should be implemented. Link believes that in addition, further changes to the legislation are required that take account of the recent awareness of the importance of veteran and ancient trees.

The Government has provided guidance to local authorities in Planning Policy Statement 9: Biodiversity and Geological Conservation. It states that "Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided"<sup>20</sup>. Planning authorities should encourage the conservation of such trees as part of development proposals. In addition it was made possible under Circular 06/2005 for local authorities in England to apply a TPO on biodiversity grounds alone<sup>21</sup>. This places a greater expectation on local authorities not only to protect aged and veteran trees but to take proactive measures to secure the populations of such trees in their areas. The lack of reference to veteran trees in the consultation document is therefore of concern to Link and additional resources should be made available to enable them to meet this challenge.

### ***The historic environment***

#### **Question 27 (page 27)**

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

##### **i. in existing woodland; and/or**

The existing regulations and guidance are working well to protect the historic and archaeological aspects of woodland landscapes, though the focus on impacts of the management of existing woodland has not been as strong as in areas where new woodland is being created. Innovative approaches are needed for assessing historic landscapes already heavily modified by woodland and, while the leading edge work being done (for example by the Forestry Commission to encourage the development of effective survey and evaluation techniques) is commended, this requires greater resources in the future.

Woodland, as defined by the UK BAP includes wood pasture and parkland. This habitat is astonishingly under protected despite its importance for our heritage as well as biodiversity.

<sup>20</sup> See Planning Policy Statement 9: Biodiversity and Geological Conservation, [http://www.communities.gov.uk/pub/833/PlanningPolicyStatement9BiodiversityandGeologicalConservationPDF243Kb\\_id1143833.pdf](http://www.communities.gov.uk/pub/833/PlanningPolicyStatement9BiodiversityandGeologicalConservationPDF243Kb_id1143833.pdf)

<sup>21</sup> Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system (<http://www.communities.gov.uk/index.asp?id=1144318>)

Unlike other woodland habitats the UK's wood pasture and parkland is not recognised in the EU Habitats Directive despite its ecological and cultural similarity with Fenno-Scandian wooded meadows and pastures. There is a strong case for Defra and JNCC lobbying on this at a European level so that this habitat can be included in the Habitats Directive.

Registered historic parks and gardens, which are often places with significant concentrations of ancient and veteran trees, are treated as a material consideration in planning proposals; however the designation puts no further duty on local authorities. There is a strong case from both a heritage and a biodiversity standpoint for the scope of this designation to be widened so that it incorporates historic parks that do not have a designed element. In addition we would wish to see a formal consent regime for works or alterations that affect the special character of a site. Such proposals are currently the focus of a government consultation in Scotland.

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

In these situations reliable assessment of archaeological implications depends on the quality and availability of data in local Historic Environment Records and local heritage services, some of which have been subject to recent local government cuts and may not be able to sustain the advice and information services provided in the past. This places a greater weight on the archaeological management information that the Forestry Commission maintains for its own estate, which is in many respects exemplary. Where there is an absence of existing data about the archaeological character of an area under consideration for new planting, there is a need for effective, cost-effective sampling strategies to assess potential and guidance on what level of site evaluation is reasonable.

**Economic sustainability**

***Skills and knowledge transfer***

**Question 28** (page 29)

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

Yes, Link believes that Government support can not only contribute significantly to, but is also essential if the benefits of wood fuel and other potential markets are to be maximised, for example grants for biofuel start-up/capital costs, woodland management and marketing of wood products. In order to continue contributing, we would emphasise that this support needs to be sustained, joined up and promoted.

**Question 29** (page 29)

**What are the priorities for capacity building and innovation?**

Link's priorities for capacity building and innovation are:

- to encourage appropriate management to meet non-woodland and woodland UK Biodiversity Action Plan priority species and habitats targets.
- to undertake management planning towards UK Woodland Assurance Standard certification of native woods – this could range from training in survey techniques, management planning and auditing, as well as direct support for contracting such tasks.

- To support the development of large scale but locally based wood energy uses. These have the potential to use large volumes of timber from existing woodland and thereby benefit a large number of relatively small woodland owners with knock on benefits for rural economies and woodland biodiversity.

### ***Buying public benefits***

**Question 30** (page 29)

**Do you agree that all government support for sustainable woodland planting and management should be based on delivering the environmental, social and other public benefits of sustainable forest management, including the production of renewable energy and the economic regeneration of lagging rural areas?**

Link believes that the public benefits of woodland and forestry far outweigh any market based return and that a strategy wholly based on present and future markets will not deliver sustainable woodlands and forestry and that the principal of multi-purpose forestry should therefore be at the core of the revised strategy. It follows that Link agrees that Government support should be based on delivering environment, social and other public benefits of sustainable forest management, and this should seek to deliver benefits across the three strands of sustainable development. However Government support must also contribute towards sustainable multi-benefit forestry, not simply payment towards the single-object of biomass planting only. Link is concerned about the singling out of renewable energy and rural regeneration in this question, and encourages a balanced approach.

### **The overall amount of woodland planting and woodland management**

**Question 31** (page 30)

**Do you agree that:**

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

Yes. If the revised strategy is to deliver upon 'Keepers of Time' Link believes the strategy must ensure that there is no further loss of ancient and semi natural woodland.

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

Link agrees that the proportion of woodlands managed sustainably should be increased significantly, and considers that woodlands should be managed in line with the UK Woodland Assurance Standard, with the UK Forestry Standard as an absolute minimum for all of England's woods and forests, including Short Rotation Coppice and Short Rotation Forestry. Link believes that the revised strategy should acknowledge that meeting this important objective requires facilitation measures, expanding the availability of ecological survey and management planning measures in England Woodland Grant Scheme (both the Woodland Assessment Grant and the Woodland Planting Grant).

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

Expansion remains an objective of Government policy and England has exceedingly low tree cover. The Government has demonstrated considerable enthusiasm for targets in other areas of policy. Link therefore believes that the provision of a woodland creation target would give a good sense of the job to be done, inspire

action and support the regions with national direction. A target would also ensure the provision of benefits to people where they are most needed and help to make the countryside more robust to climate change

Woodland creation is necessary in order to deliver the UK Biodiversity Action Plan (BAP) targets. However Link believes that woodland improvement targets are also important, which could include improving the biological condition of existing native woodland sites, both designated and non-designated, that contribute to the targets for the UK BAP native woodland priority habitats. Improving woodland condition is likely to be a key issue in addressing woodland bird declines, a Government PSA target.

Link therefore disagrees with the question posed, as we believe that there is already a good basis for a national woodland expansion target through the HAP target of a 1% increase per annum already in place, plus the social targets as set out in Woodland Trust Space for People work. This requires the creation of 48,000 hectares of woodland in order to ensure that everyone has access to a 2 hectare wood within 500 metres.

**Question 32** (page 30)

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

Link believes that there should be woodland expansion targets as we already have targets right down to the regional and local level through the Woodland Trust's Space for People and Space for Nature work which sets out the case from individual electoral wards and natural landscape units respectively. In addition some, but not all, of the RFFs already have targets and Link therefore believes that these targets should be acknowledged in the revised strategy.

**End of consultation response**

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