Forest of SELWOOD

UK Parliament Environment, Food & Rural Affairs Committee (EFRA) inquiry: Tree Planting and Woodlands 2020

Consultation submission on behalf of the **Forest of Selwood CIC**

Our response is **not** confidential.

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The Forest of Selwood.

Selwood is a deeply historic landscape on the eastern edge of Somerset which has been a recognisable, legal and physical entity since at least early Anglo-Saxon times prior to the Norman Conquest. Within its borders there are the towns of Frome, Bruton, Wincanton and the headwaters of five significant rivers: the Brue, Frome, Stour, Wylye and Cale. For over a millennium the Forest of Selwood has been shaped by its people, trees and wildlife.

As an historic entity, the Forest of Selwood was one of the landscape areas called Forests or Chases (like the New Forest), over which Forest Law operated. These were wild areas where populations of large wild herbivores and their habitat were actively conserved, enforced by laws and fines.

The Forest of Selwood links to other Mediaeval Forest areas: Forest of Gillingham, Cranborne Chase and New Forest to the south, north into Chippenham and Melksham and west to Mendip. Taken together, this forms a chain of landscapes from The Solent to the Cotswolds Scarp characterized by trees; lone trees, in ancient woodlands, wood pastures and parkland, parks, orchards and hedgerows.

The Forest of Selwood Community Interest Company (FoS CIC)

The Forest of Selwood Community Interest Company comprises of local people, land managers and organisations as well as knowledgeable advisors committed to a better future for this special area. We collaborate with others that share our vision for the future to:

- **Revive and enhance wildlife.**
  Selwood is a quintessentially English landscape characterized by flower-rich meadows, ancient wood pastures, parkland, hedgerows and lone or open-grown trees as well as extensive ancient woodland. The vision foresees a better-connected landscape of increasingly species-

rich habitats, wilder river corridors that slow the flow, improved soil, air and water quality. Trees of all ages, but especially open-grown, lone trees and flowering native shrubs, play a special role in this.

- **Slow climate change.**
  The aim is to encourage and promote a diverse mix of regenerative agriculture, silvo-pastoralism, habitat conservation, restoration and creation and rewilding alongside a proportionate amount of forestry so that the landscape captures and holds carbon while reducing emissions of other greenhouse gases.

- **Connect people with a distinct and dynamic landscape which gives them a sense of identity with the land.**
  The aim is to create a wildlife-rich, more resilient and adapted place for people to live and work, through the promotion and active conservation of natural beauty and cultural capital. For example, we helped establish setting up an Environmental Stewardship, Selwood Facilitation Fund Group that has brought farmers together to protect and increase natural capital across the area.

We would like to see this once historic boundary between the Angles and the Danes to be considered as a new Area of Outstanding Natural Beauty and a large-scale landscape nature recovery project.

----- End of introduction -----

Fos CIC response to the EFRA Inquiry Call for Evidence
Summary key points:

The vision should be for quality and diversity not just tree numbers. The Forest of Selwood CIC consider that the overwhelming focus on forestry and tree planting targets is fundamentally the wrong approach. Our vision for our area is for a landscape rich in trees, especially lone or open-grown trees, but as part of a diversity of habitats that are of as much benefit for biodiversity overall as for carbon capture and residence. Too many trees of the wrong kind, in the wrong space and wrong place would be in our opinion wholly wrong and would damage open habitats and landscapes.

Working in partnership with the whole community is a priority. We work in partnership and share our vision with many organisations and the community, but the primary mechanism of intervention appears to be entirely in individual landowners' hands, strongly influenced by blanket government targets and government incentives plus carbon credits. This takes all agency away from organisations like FoS CIC and the wider community and all too easily result in a landscape that only a minority benefits from and does not achieve carbon targets either. Public money should maximise public good. FoS supports the concept of Nature Recovery Networks that should be the key spatial guidance and prioritisation mechanism implemented through Local Nature Recovery Strategies (LNRS). We would welcome within a LNRS for our area a map of existing areas important for nature (covering protected sites

and wildlife-rich habitats and individual valuable trees) and identifies in detail key opportunities for enhancement.

Clarity of land-use terminology will avoid unintended consequences.
FoS CIC requests that the terminology is thoroughly reviewed so that it is fit for purpose. Words such as forestry, woodland creation or tree planting sound superficially appealing but are very misleading and in particular do not reflect the beauty, heritage and diversity in the English landscape created by wood-pasture and parkland, lone/open-grown trees, hedgerows, orchards and riverine tree'd corridors. These are the tree features FoS CIC would like for our area and not densely planted, closed canopy, dark blocks of native or exotic conifers purely for timber production outcomes. Open-grown, ancient and other veteran trees, wood-pasture and parkland are of international value for biodiversity and they should be protected from harm or loss. Opportunities for enhancing wildlife need to be strongly incentivised in our Forest of Selwood area, including re-wilding (a form of wood pasture land use) where natural processes of tree colonisation are encouraged.

Please bear the above points in mind in our answers to the questions.

Question 1: Are the UK Government's targets for increasing forestry coverage, and tree planting, for England and the UK sufficiently ambitious and realistic?

- **Biodiversity and climate/carbon outcomes must be in step**: To address the two crises and avoid damage to important habitats, climate and biodiversity goals must march hand-in-hand. Targets for tree establishment and carbon sequestration should be clearly tied to biodiversity targets. In order to receive public funding, any tree establishment (natural processes or planting) proposals must demonstrate clear biodiversity net benefits and must also demonstrate no harm to habitats of principal importance or declining species.

- **Right tree, right space, right place for the right reason**: to address biodiversity, the tree targets need to be broader and more inclusive of achieving **diverse** landscapes, including encouraging open space, regenerative agriculture, pastoralism, scrub, rewilding and soil conservation - not solely concerned with forestry policy and woodland expansion. All habitats conserve carbon not just tree'd habitats and semi-natural wood-pasture and parkland may conserve the most as well as benefiting wildlife.

- **Communities must have an opportunity to have a say.** If public money is to be used as an incentive then local people deserve the opportunity to influence the outcomes in their areas especially if those areas are of national or international value already whether designated as such or not.

- **Public money must be fairly distributed** and also maximise as many priorities as possible but at least in equal measure to counter both the climate and biodiversity crises. Funding must address a range of project scales so that large monoculture plantations are not favoured, by financial incentives, over smaller and more structurally -diverse

proposals potentially over multiple landownerships.

- **Importance of wood-pasture for carbon storage and carbon residence**: FoS supports the submission of the Wood-Pasture and Parkland Network WPPN in demonstrating the value of this habitat of principle importance – nationally and also internationally both for biodiversity and carbon sequestration value.

- **Lone or open-grown trees**: are immensely important for beauty, longevity, as well as biodiversity and carbon sequestration/residency especially in in mosaic landscapes which include flowering shrubs.

- **Nature Recovery Partnerships and Local Recovery Plans** must have agency to participate in decision-making at a local level. They must prioritise which treescape is appropriate for a specified location, if funded by public money, and not just a contract between the landowner and the funding body.

- **Natural processes of colonization and rewilding.** FoS CIC's vision is for a wilder landscape. We consider that tree and shrub establishment by natural processes, managed by large herbivores, in the area should have a high priority especially re-wilding.

----- End of question 1 -----

Question 2: Are the right structures in place to ensure that the UK wide target for increasing forestry coverage is delivered?

- **No**, FoS CIC does not consider that the right structures are in place. There are some worrying gaps in information, advisory services and guidance and regulatory controls and oversight.

- **Deficient inventories:** there is currently a significant deficiency in most priority habitat inventories and definitely in the priority wood-pasture and parkland inventory and the citizen science database of ancient and other veteran trees. Good decision making in permanent land use change, where trees are involved, is at risk and has been demonstrated time and again to be wanting. In order to achieve right tree and/or habitat in the right place and space it will be necessary to have robust maps of the distribution and quality of the existing and potential resource in order to maximise on biodiversity outcomes (bigger, better more of Lawton principles) and to avoid damage to existing wildlife. Investment is required in establishing, updating and maintaining inventories of all habitats and landscape features. Also investing in competent people/ advisory staff with the time to assess applications properly and identify habitats which may not have been captured on current inventories.

- **Training for advisory and regulatory staff**: there is currently a deficiency in the breadth of understanding and promotion of habitats

and heritage landscapes even within the statutory conservation and heritage bodies. In Forest of Selwood we are working with many of the appropriate organisations to develop training and materials to address these gaps. Any counter-productive tree planting targets and incentives would compromise good decision making in terms of landscape restoration and regeneration.

- **Advisory services resourced at levels appropriate to scale of targets**: well-resourced advisory services are required, ones which can properly engage with land-managers and the community to encourage the management, restoration and creation of wood pasture and parkland, ancient and other veteran trees and other open-grown trees in the wider landscape or urban communities.

- **Public money for public good**: a starting point should be that public money should be used for public goods and not as an income supplement for businesses. Public goods can be achieved through a wide diversity of habitat restoration and tree establishment (both by natural colonization/processes and tree planting), including wood-pasture and parkland and not just through forestry.

- **Funding and advice for extensive grazing systems**: Wood pasture, parkland and rewilding can provide a win-win situation for land-managers where a permanent change of land-use from agriculture to forestry is a barrier to establishing more trees and shrubs. It can be managed by extensive grazing where the trees benefit livestock management and soil improvement. Management by extensive grazing allows for cash-flow of income throughout the lifetime of the habitat but especially during the establishment period.

- **Collaboration and community vision**: greater collaboration must be encouraged at local level between organisations, experts and individual land-managers around a strong community vision for individual and scattered trees and other new wooded habitats (including WPP). It should be a requirement of local partnerships, Local Nature Recovery Strategies and Nature Recovery Networks to identify where dynamic, mosaic habitats such as wood pasture and parkland are located and where management, restoration and creation would best be delivered but especially in relation to historic landscapes (e.g. historic parks and gardens, treed commons and the uplands).

----- End of question 2 -----

3) How effective is the co-ordination between the four nations on forestry issues, including biosecurity, plant health and other cross-border issues?

N/A

4) Why were previous ambitions for increasing tree planting in England not met and what lessons should be learned?

FoS CIC consider that lack of understanding of the forestry and agricultural industries to a deeply held appreciation of a quintessentially diverse, beautiful and historic landscape rich in wildlife by the British people is a major obstacle.

The way wilding has captured the public imagination is a good indicator that biodiversity targets must be equally addressed.

The government must address issues of community engagement in decision-making if public money is to be used to incentivise outcomes and that one-size-fits all plantation planting is not the sole solution because it is the simplest to administer.

----- End of question 4 -----

5) In relation to increasing forestry coverage in England, what should the Government be trying to achieve? For example, how should the following policy objectives be prioritised?

- **Mitigating or adapting to climate change;**
- **Promoting biodiversity and nature recovery;**
- **Increasing biosecurity and plant health;**
- **Improving human well-being and health;**
- **Protecting natural and cultural heritage;**
- **Food security;**
- **Creating commercial opportunities from forestry, tourism and recreation; and**
- **Any other priorities –**

- **Equal priority for biodiversity.** FoS CIC have stated already that the objective must be to prioritise biodiversity outcomes equally alongside those to mitigate climate change. The CIC do not consider plantation forestry of native or exotic species the appropriate outcome in the majority of cases for the Forest of Selwood.

- **Natural and cultural heritage** must be a high priority and safeguarded and enhanced.

- **Better understanding of carbon sequestration and storage.** Research into carbon sequestration has been focused on commercial operations and too little into regenerative agriculture, habitats and lone tree options which generate multiple benefits for communities not just for individual landowners.

----- End of question 5 -----

6) Are the right policies and funding in place to appropriately protect and manage existing woodlands in England? How will prospective changes to policy and legislation effect this?

FoS CIC supports the answers to this question supplied by the Wood Pasture and Parkland Network and the Ancient Tree Forum.

- **Priority Habitats and valuable trees must have up to date and regularly reviewed inventories**: the lack of complete priority habitat and individual valuable tree inventories is a major problem and must be addressed urgently. Without appropriate mapping of the resource it is not possible to make good decisions in relation to new planting, buffering or extending or stepping stones for biodiversity or development. Valuable trees included those that are ancient or irreplaceable veterans, rare, native and long-established species champions, trees of historic and cultural special interest. Priority habitats must be protected from infill by tree planting where it would damage the existing open areas.

- **Planning for the future white paper proposals**: the proposal of the division of the country in different development zones has the potential to undermine the current absolute NPPF protection for ancient woodland (including ancient wood-pasture), ancient and veteran trees and, particularly, may endanger these habitats and species by allowing development too close to them. Buffer Zones around existing open-grown trees and woodland edge habitats must be embedded in the policies with priority funding for carefully-designed projects that protect edge and transition habitats. Recreational pressure from new developments close to ancient woods can lead to losses in biodiversity and erosion of soils (and subsequent carbon loss and tree declines).

- **Policies and funding for extensive grazing**: grazing incentives to ensure the dynamics of these mosaic and open-grown tree habitats also need to be provided using money saved by switching away from support of any intensive grazing, non-grass-based, high-input swards or predominantly indoor-based systems.

- **Ancient and other veteran trees – natural capital**: ancient and other veteran trees are mainly found outside woodland habitats (most especially, and counter-intuitively, those woods mapped on the Ancient Woodland Inventory) and are important biodiversity stepping stones and often cultural icons in rural and urban locations e.g.Wyndham's Oak in neighbouring Forest of Gillingham. They are long-term natural capital and provide centuries of ecosystem services. FoS CIC would like to see ancient and other veteran trees outside wood pastures better protected, managed by best practice and land-managers encouraged to establish more open-grown trees across the landscape to become the ancient trees of the future. Few ancient, let alone other special trees in our area, are protected. They have survived through goodwill but are extremely vulnerable to pre-emptive felling before the community can indicate their value. A notification system such as via Felling Licences (but the exemptions for 5 cm per quarter and others would need changing) or Conservation Area S211 designation for special trees would mean that experienced Tree or Woodland Officers could discuss management options with owners before they are lost. In return, owners of such trees should be eligible for funding to help with

best practice management.

- **Penalties as deterrents to tree loss**: greater penalties to deter loss or damage to ancient woodland (including wood pasture and parkland) ancient and veteran trees and other valuable trees given their priority for a sustainable future. Also an appropriate metric for replacement e.g. in biodiversity net gain situations that properly recognises the long term nature of any true replacement of value for society.

- **Local authority tree strategies**: it should be a duty within Local Authority tree strategies to use their powers to identify and protect valuable trees in advance on land allocated for development. Local Authorities will need to be adequately resourced, with strengthened technical expertise, for this additional purpose. Such tree strategies should become a mandatory part of all Local Plan Green Infrastructure, Nature Recovery Partnership prioritisation and Local Recovery Networks strategies.

- **Urban treescapes**: mapping of habitats in urban areas (e.g. through use of software like *iTree*) so that they can be counted as contributing to carbon sequestration targets and targets for planting in urban areas are counted in the England Tree Strategy. Local authorities should be given the resources to complete such work as a mandatory part of local plans.

Submitted on behalf of the Forest of Selwood CIC.
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