



RTPI

mediation of space · making of place

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4 August 2006

Our ref: Policy

Dear Ms Grace

**ENGLAND FORESTRY STRATEGY CONSULTATION:
RESPONSE BY THE ROYAL TOWN PLANNING INSTSITUTE**

I refer to DEFRA's current consultation on the England Forestry Strategy and thank you for the opportunity to provide a response.

I enclose the comments of the Royal Town Planning Institute (RTPI), developed following a period of internal consultation within the Institute. Detailed observations made by the RTPI North West Region must be acknowledged as having formed a substantial input to these.

If you have any questions about the enclosed comments, please contact Rynd Smith, RTPI Head of Policy and Practice on 020 7929 9478.

Yours sincerely,

DIGITALLY SIGNED BY RYND SMITH
not for unauthorised use

Rynd Smith
Head of Policy and Practice

THE ENGLAND FORESTRY STRATEGY CONSULTATION A RESPONSE BY THE ROYAL TOWN PLANNING INSTITUTE

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PART 1: SUMMARY

The following points summarise the RTPI response to the England Forestry Strategy Consultation.

The practice of forestry in England increasingly demonstrates a commitment towards increased environmental and social sustainability, through carbon uptake, as a source of renewable materials and fuels, through the regeneration and enhancement of natural environment and biodiversity values and through providing high quality visual amenity, access and recreation opportunities for communities.

In responding to this consultation document, the RTPI seeks the following.

- Maintenance and development of current policy trajectories:
 - to increase the land area of England covered by forests;
 - to further research and develop the capacity for forests to contribute towards carbon uptake and climate change mitigation;
 - to counter the effects of low global wood prices through the development and strengthening of domestic and European markets for sustainable and renewable timber products as construction, manufacturing and energy resource inputs;
 - to retain and manage ancient woodlands as nature conservation resources;
 - to continue the recognition of forests and forest management more broadly as providing ecological resources and as presenting opportunities for ecological enhancement;
 - to increase the planting, use of and access to woodlands as recreational, amenity, landscape and community resources; and
 - to continue to promote new plantation forestry in a manner that is compatible with the use of indigenous forest species, ecological, landscape, visual amenity and recreational enhancement.
- Stronger recognition in the strategy of the role and value of the spatial planning system for forestry undertakers and the role and value of forests in planning for sustainable communities, including action:
 - to better join up forests policy and spatial planning policy that seeks to recognise and support the roles that English forestry and trees can play in sustainable development, landscape, ecological, amenity and recreational enhancement for urban populations;
 - to further explore, support and develop the contribution that urban development processes can make to English forestry, through the provision of land for planting and the resources to support forest management to perform the functions set out above;
 - to further explore, support and develop the contribution that English forestry can make to urban development processes, as a source of sustainable building and furnishing materials and fuels; and
 - to ensure a better and closer integration of planning and heritage considerations bearing on forestry decisions and of forestry considerations bearing on planning and heritage considerations.

PART 2: GENERAL POLICY RESPONSE

1. At the opening of any engagement by the Royal Town Planning Institute (RTPI) on forestry policy, it is necessary to acknowledge that forestry and afforestation processes are not 'development' for the purposes of the planning legislation¹, a split that has been firmly entrenched in our legislation since 1947. It is relevant to ask therefore, what interest the RTPI and its membership of spatial planners have in forestry matters?
2. The answer to this question is that forestry and spatial planning policy are inextricably entwined and have been for many years in the RTPI's view. Both planning and forestry policy consider the use and development of land together with the economic, social and environmental effects of use and development. Both should and increasingly do consider these within a spatial frame of reference: examining how the location of particular uses and developments relates to the location of other uses and developments, people and places. Further, as your consultation paper very clearly and validly acknowledges, forestry policy is not just about plantations to provide a commercial timber resource. It addresses increasingly broad considerations such as the role of forests in sustaining and enhancing landscape, amenity, recreational, heritage and nature conservation values, used and enjoyed by millions of people.
3. The consultation paper acknowledges:

...the price of some woodland areas has risen above the level that reflects their timber value, as more and more people seek to buy a rural lifestyle.²

In the view of the RTPI, this is symptomatic of an increasing tendency for forestry to deliver a composite of goods and values to urban populations, which increasingly cuts across its historic role as a means of primary production in the rural environment.

4. Whilst it is not necessarily the core business of this consultation, the RTPI must flag its intent to commence a broader debate about the degree to which forestry operations should constitute 'development' for the purposes of planning legislation, together with the means of strategic direction and development management that would be appropriate for forestry, should the debate support this basic proposition. The purpose of this debate will be to consider whether there is an ongoing justification for the separation of forestry and planning policy, or whether some aspects of spatial planning disciplines could in fact be of benefit to the forestry industry, to rural and to urban populations. At a time when DEFRA itself has recently concluded a consultation that canvassed the application of spatial planning principles to the marine environment, it appears timely to re-examine the current boundaries, costs and benefits of existing planning processes in subject matters not currently within the statutory purview of planning on land.
5. It remains the underlying concern of the RTPI that forestry and planning policy have much in common (as is made out in more detail below) and there are many potential benefits and efficiencies to be gained from their greater integration.
6. That being said, for spatial planners, the policy trajectories pursued by English forestry over recent years have largely been positive.
 - The area of land under forest has increased.
 - The quality of the forest resource as broadly measured has increased.
 - The contribution of forested land to the achievement of natural environment, landscape, public amenity and access policy objectives has been increasingly recognised and supported.
 - The capacity for forest management and development to contribute towards environmental and community sustainability is increasingly being recognised and acted upon.
7. The key issue for spatial planners is to ensure that the benefits of forestry and particularly those benefits accruing to sustainable communities and environments are identified, appropriately valued and continue to

¹ Section 55(2)e, Town and Country Planning Act 1990

² At paragraph 20, page 10.

be provided. Paragraphs 11 to 19 of the consultation document demonstrate a clear summary understanding of the policy issues raised for spatial planners around forestry in England. Paragraph 15 sets out a worthy sentiment that should be more widely echoed, namely that:

...sustainability requires that one government policy or action should not frustrate the purpose of another, or cause environmental harm.

It is very valuable that this foundation stone of sustainable development policy is clearly acknowledged as a foundation stone of forestry policy.

8. Somewhat ironically then, the greatest forestry policy challenge appears to be that, at a time when there is a growing consensus about the desirability of increasing the land area under forests for a broad range of socially and environmentally beneficial reasons, there is also an apparent global market failure affecting forestry and forest products. This emerges from a substantial decline in timber prices, posing difficulties for those who are attempting to privately manage forests and obtain a market return. Potentially perverse results emerge, for example in your paragraph 11 which records that less than 25% of the hardwood timber that could be harvested sustainably from our native woodlands is actually being harvested. Similarly, there is emerging evidence that the consequent reduced woodland management is changing the biodiversity values of some of our woodlands.
9. The RTPI expresses concern over the falling price of timber and the likely implications of this for the future of our trees and woodlands. What impact do cheap timber imports have on our domestic woodland policy? It is important and surely sustainable to locally source more of our timber in our construction and energy industries, in a manner that continues to support broadly native species forests that additionally provide excellent amenity, recreational and biodiversity resources.
10. Another irony lies in the emerging evidence that forest land prices in some locations are rising above the timber asset/crop value of the forest. This is likely to reflect the growing willingness of people to invest in lifestyle and conservation goods, over and above the economic return to be achieved from land. This may be a positive development if it leads to a new source of investment in woodlands and woodland management. However, it also poses substantial challenges if it begins to render traditional woodland management and the sourcing of timber and fuels uneconomic as in principle uses of land, or results in a fragmentation of the woodland estate and a reduction in the knowledge and capacity necessary to support woodland management.
11. With reduced potential incomes from forestry and rising land prices for forests, forest managers are nevertheless under increasing pressure to deliver more from less: more forest coverage, better forest management, less intensive management that increases the representation of native species and can increase the length of the cropping cycle, better contributions towards nature conservation, better contributions towards landscape values, public access, amenity and recreation. The key challenge is to ensure that policy settings continue to increase the forest area and quality across a broad range of measures, taking responses to these issues into account.
12. Above all, forestry policy needs to be sustainable policy. The life cycle of trees from planting to cropping is typically long. It will be important to ensure that new policy settings do not react to current but rapidly changing market conditions, in a way that could distort the sustainable management of our forests in the medium to long term.
13. Care should be taken not to paint too gloomy a picture. The new single payment scheme may have forestry and landscape implications through encouraging more woodland on marginal farm land (your paragraph 20).
14. There is also considerable potential in the view of the RTPI to increase the contribution made by urban development processes towards the planting and management of forests, to provide the amenity, recreation and nature conservation assets much enjoyed by urban populations. This is a dimension that in the RTPI's view should receive greater emphasis in the strategy than provided to it in the consultation paper. One means of achieving this end will be to ensure that the policy links between spatial planning, urban

development processes and forestry are made more apparent than at present. The likely subject matter for this enhancement of the strategy is examined further in paragraphs 15 to 21 of this response below.

15. It would be valuable for the strategy to make closer links with forestry-related government spatial planning policy.
16. ODPM (now DCLG) Planning Policy Statement 7 (PPS7) addresses sustainable development in rural areas. Paragraph 33 of that document responds to the existing England Forestry Strategy 1999, although arguably not in a manner that sufficiently recognises the breadth of roles that forestry can play in spatial planning. It is therefore disappointing that paragraph 16 of the consultation document contains no mention of PPS 7. This should be rectified. The relevant forestry paragraph of PPS 7 (Paragraph 33) should also be expanded at the next review of this document, in line with the outcomes of this consultation.
17. Similarly, DCLG PPS 9 addresses biological and geological conservation. It identifies a role for the spatial planning system in the identification, conservation and enhancement of areas of ancient woodland. It would be valuable for the reviewed forestry strategy to refer more strongly to this function of spatial planning.
18. Planning Policy Guidance Note 2 (PPG2) considers green belts, in which forestry is an appropriate use and Community Forest development is encouraged as a means to enhance the settings of urban areas and recreational use of the countryside. Again, the Forestry Strategy should respond to this role of green belts and should make clear how forest use and Community Forest development are supported through planning within green belts.
19. Spatial planners and planning authorities are also engaged in a wide range of forestry relevant activities such as the preparation of plans and strategies that address recreation, conservation, countryside management and land management, for example, in areas of outstanding natural beauty and national parks. These include the capacity to seek land and funding for forest and Community Forest development and management as part of the 'green infrastructure' for new communities, for example, by way of agreements under section 106 of the Town and Country Planning Act 1990 (as amended).
20. In times when the community and environmental benefits of forests are increasingly recognised, but the market returns of forestry and hence the financial resources available for community and environmentally beneficial forest management are more limited, the creative use of such spatial planning tools is warranted. The use of planning agreements to secure the green infrastructure discussed in the strategy should be highlighted.
21. Spatial planning is also active in the identification and protection of trees and woodlands, largely for amenity, landscape and nature conservation purposes. The service of Tree Preservation Orders and the imposition of conditions to planning permission that set landscaping requirements and/or protect trees are mentioned in the strategy, but greater attention could be paid to the integration of these functions of the planning system with the implementation of forestry policy overall.
22. In summary, spatial planning involvement with forestry can be improved by way of:
 - developer funding/provision of forest areas and corridors as a recreational resource, for example in housing or employment growth areas where parks, country parks and Community Forests can be developed with a forestry component;
 - developer funding/provision of forest areas and corridors as nature conservation response on site or as an offset, using similar measures to those set out above;
 - developer funding/provision of woodland planting as landscaping, to enhance visual amenity or to screen otherwise visually intrusive development ranging from industrial and minerals uses to the development of new road alignments;
 - local government involvement in woodland and forest management through direct ownership and through contributions such as countryside management and conservation volunteer services; and
 - requirements that trees or woodlands be safeguarded, largely to meet amenity, landscape and nature conservation objectives.

The implementation of the strategy could be supported through the provision of practical examples or case studies of these types of work.

23. The proposed devolution of decision making and delivery to the regional policy level is supported by the RTPI (your paragraph 17). The specific mention there of the need for co-ordination between regional forestry, economic and spatial strategies is strongly supported. Mention should also be made in that paragraph of the detailed policy and implementation role of local development frameworks.
24. The RTPI is in broad agreement with the principles underlying the strategy and set out in your paragraph 23. Particular mention is made of the principle of public benefit, with the view expressed that spatial planning provides a key means of delivering public benefits associated with forests and forestry.

PART 3: RESPONSE TO QUESTIONS

The Role of Government

25. Question 1

The RTPI broadly supports the objectives for government intervention outlined in your paragraph 24.

26. Questions 2 and 3

The comments on regulation in your paragraph 25 require further explanation, since trees, woodland and forests are clear indicators of the health and wellbeing of the planet as a whole. If globalised economic processes undermine and damage our own trees and woodlands and the market is not sending the right signals to deliver appropriate forest management, then the government may need to regulate in order to create the right market conditions for our trees and woodlands to flourish more healthily.

27. Some mention should be made of the capacity of spatial planning to assist in providing requirements and resources for improved forest management for community and environmental benefit. Your paragraph 25 does not currently address this opportunity.

28. However, the government should set the right standards at all levels in order to encourage the sustainable management of our existing woodlands, the growth of woodland cover and increasing environmental and community contributions from woodlands. Market and trade agreements and regulations under the EU and wider global agreements that support unsustainable patterns of forest production which underpin falling forest product prices should be questioned. Likely arenas for action are in the fields of the Foreign Office, DFID and the Treasury rather than DEFRA, but in the spirit of joined up government these arenas should not be overlooked.

29. Questions 4 and 5

It is important to have strong government support to counter market failures and reinforce the stated government priorities in supporting trees, woods and forests.

30. Particular reference should be made to your paragraph 26 (ii) and the role of the spatial planning system in designating and administering Tree Protection Orders. Reference should be made to the role of planning in your paragraph 26 (vi), including the capacity of payments under planning agreements (s 106 agreements) to purchase public forestry benefits, particularly where these relate to or are made necessary by a new urban use or development. Examples include the provision of forests for recreation, nature conservation management or offset, screening and landscape enhancement. Reference should be made to the role of planning in your paragraph 26 (vii) or in a new policy statement, including references to the direct management of woodland estates by local government to achieve planning objectives and to measures such as countryside management undertaken in green belt, national park or AoNB woodlands.

31. The Rural Development Programme (2007-13) is an important tool for woodland policy. Regional Forestry Frameworks are supported and need to remain important mechanisms for implementation (your paragraph 28). Your paragraph 29 is an important one for planning and there should be a stronger and clearer link made here to PPS 3, 7, 9 and PPG2. Under the new planning system, with its wider spatial emphasis, trees, woods and forest policies can play a stronger role and should be given greater emphasis. An express statement of an appropriate role for local development frameworks and recognition of the positive forest creation and forest management opportunities that can be delivered through the planning system should be added to the strategy.

Environmental Sustainability

32. Questions 6 and 7

Forests can provide carbon sequestration and this benefit is likely to increase as newly planted trees mature in the years ahead (your paragraph 34). The carbon contribution of forest soils, which take time to develop, is also important (your paragraph 37). However, the RTPI does not support the view that carbon sequestration benefits should be accepted as a primary driver of forestry policy, for the following reasons.

- England is a developed economy with a high population and strong competition for land. It is also a major greenhouse gas emitter. It would in principle be wrong to suggest that increasing the area of woodland planting in England can achieve more than a marginal change in carbon uptake and hence contribute materially to England's response to climate change, unless new plantings were to proceed on an unprecedented scale. The nature of the land requirement for such plantings would suggest that they would be most likely to take place overseas, in less densely populated locations, using the proceeds of, for example, a carbon trading regime.
 - It is in any case the view of the RTPI that greenhouse policy should proceed in a hierarchy of action.
 - The strongest emphasis in greenhouse policy must be to avoid greenhouse emissions at source by avoiding the establishment of new spatial and structural commitments to make new greenhouse emissions.
 - The next tier of the hierarchy should be to reduce or minimise existing emissions, through pricing, taxation or other demand management measures for emitting processes and to substitute more efficient lower emitting processes and technologies for higher emitting equivalents.
 - Sequestration has a role to play, but it should be seen as lower in the greenhouse hierarchy than emissions avoidance and reduction. It should be employed in circumstances where the economy is already unavoidably committed to given levels of emission and reduction and minimisation measures have already been pursued to the extent that they are technically and economically feasible.
 - Forestry is by no means the only available sequestration technique, and, as outlined above, competition for land suggests that other more efficient techniques may make better inroads in our densely populated and post industrial society.
 - Mention must be made of the position that some forestry processes can also liberate greenhouse gases to the atmosphere (for example clearance and or deep drainage of uplands) and that forest planting and management cannot necessarily be seen as a universal greenhouse good.
 - Mention must also be made of early results from some research suggesting that the suggested capacity of forests to respond to increased atmospheric carbon by increased productivity and hence sequestration may not be demonstrated in all circumstances of climate change.³
33. It follows that the RTPI considers that new woodlands should remain as multi-functional features for the purposes of English policy and should not be primarily justified by way of their role as carbon sinks.

Climate Change: Substitution

34. Questions 8, 9 and 10

The policy approach to biomass and the role of forests needs to be linked with the outcomes from the parallel energy review process being undertaken by DTI, since it is a key element within the argument for renewables (your paragraphs 39/40). The RTPI/Construction Industry Council (CIC) response to that review promoted the concept of an 'energy hierarchy', in which energy demand minimisation action is taken before fuel substitution. Within fuel substitution, sustainable fuels should be promoted before less sustainable fuels. Increased use of renewable timber fuels within a short carbon cycle should be supported as part of this process. The RTPI advocates the adoption of this approach in policy discussions of English forest sourced biomass.

35. Managing neglected woodlands for biomass is an important and potentially difficult strategic planning issue. Its overall scale and individual proposals need to be considered sensitively so as not to undermine the other multi-functional values of woodlands such as the provision of biodiversity, recreation, landscape and amenity services. The RTPI is supportive of a substantial resumption of woodland management for biomass as long as this outcome is recognised as one of the many legitimate social, economic and environmental goods that we derive from woodlands. These goods need not be incompatible as there is, for example, clear evidence of the ways in which traditional woodland management approaches such as coppicing can generate biomass whilst conserving and enhancing the biodiversity values of woodlands that have been managed in this way for hundreds if not thousands of years. Similarly, more intensive woodland management can provide a basis

³ For example, see the 2004 Annual Report of the Australian Rainforests Co-operative Research Centre (Rainforest CRC) at page 27, where work carried out by James Cook University in Cairns is cited as supporting the proposition that reduced rainfall can transform one forest ecosystem (tropical rainforest at Daintree, Queensland) from a carbon sink into a net carbon emitter. http://www.rainforest-crc.jcu.edu.au/publications/annualreports/2003_2004/006Research.pdf

for increased recreational access to and use of woodlands when cropping is not taking place (for example through the use of forest access tracks for walking, cycling and riding). However, if a large scale resumption of woodland management for biomass results in the large scale perceived loss of familiar and valued landscape, recreational, amenity or environmental goods, there will be strong pressure for forestry management practices to be placed under greater control.

36. The RTPI suggests that one way of resolving this issues would be to undertake a series of pilot schemes to generate woodland and biomass management plans in a way that bring owners and wider communities/woodland users together. Such plans would agree the values and locations that were sought to be maintained or conserved across the cropping cycle and means whereby this could happen. Examples could include:

- agreement to manage to maintain or enhance habitat for a particular range of woodland species in a particular location;
- agreement to control landscape and amenity effects by rotation and/or the retention of buffer areas to roads, paths or residential areas, cropped on a longer or different cycle;
- agreement to reduce conflict between recreational use and cropping, for example, by maintaining access to a footpath, or providing alternative recreational access whilst a key recreational area is cropped.

Such work could also inform the development of a broader 'code of forest practice', which could establish consistent regional or national standards as a context for the development of individual woodland and biomass management plans.

37. One possible way forward for an eventual control regime would be to control woodland works (though felling controls), but to provide that works consistent with the 'code of forest practice' and with a local woodland and biomass management plan would be 'as of right', subject to enforcement mechanisms that could be deployed if the 'code of forest practice' or an individual biomass management plan was not honoured.

38. The expertise of spatial planners in drafting integrated plans, consulting with the public about their content and then implementing and monitoring them is potentially highly relevant to the carrying out of these tasks.

39. As far as expanding the market for specifically 'English' timber is concerned, the RTPI has to ask where we stand with regard to EU and wider international policies and agreements? Can we take market action to support English timber without contravening existing arrangements? Further, within the framework of the UK, a focus on English (as opposed to wider UK) timber seems artificial. Better approaches would appear to be to foster an increased market perception of and value for sustainable timber, taken from sustainably managed forests and on reporting and reducing 'product miles', aiming to support production as close to the market as is feasible.

40. It is important for farmers to consider taking up the biomass option as a replacement for set-aside land or food crops currently in surplus. Financial signals will be an important factor here. Appropriate adjustments will be necessary in the teaching of land management skills and training, notably within the former colleges of agriculture.

Climate Change Adaptation

41. Question 11

Work to provide a research base from which to make woodlands more resilient to the threats of climate change is strongly supported. It should be recognised that it may not prove possible to sustain all types of existing native woodland as economically productive in some climate change scenarios. Whilst such steps tend not to be supported in ecological terms at present, it may prove beneficial to evaluate the possible role of exotic tree species to maintain the economic productivity of some forestry. However, such work should only be undertaken in the context of careful research evaluations of the interaction between exotic species and the broader landscape scale ecosystem into which they might be introduced.

Natural Resource Protection and Management

42. Question 12

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. Overseas practice (for example Australian Landcare and catchment management initiatives⁴) demonstrate some of the approaches that can be taken. Again, links between these roles for forestry and spatial planning should be made explicit in the strategy.

Biodiversity

43. Question 13, 14 and 15

The biodiversity value of woodlands is well covered here (in your paragraph 49) and the need to bring more woodland into sensitive management is supported (your paragraph 50). The value of 'mosaics' and 'corridors' must be strongly emphasised (your paragraph 51).

44. The UK Biodiversity Action Plans (BAPs) are a vital element at national, regional and local levels. Planning plays a key role since the BAPs are an integral part of the planning policy mix (see PPS9). The strategy should emphasise the role of local development frameworks as the means whereby BAPs and particularly local BAPs are implemented through the planning system. The role of BAPs in planning decisions and appeals should also be emphasised and action taken to ensure that they are clearly reflected in relevant decisions and decision letters.

45. Paragraph 53 of the consultation paper raises an important issue that needs to be handled with sensitivity in a regionally accepted framework. The RTPI accepts that there will be instances where the interests of retaining and restoring rare and threatened open land habitats such as lowland heathland will justify the removal of, say, plantation or low grade succession forest. The RTPI North West Region suggested the Arnsdale/Silverdale AONB as an example of an area where there is perhaps too much scrub woodland and insufficient floristically important open habitat. Some active management is already at work to try and redress the balance in that location. That being said, the RTPI considers that there will always be a need to balance the existing habitat value of forest against the potential habitat value to be restored by clearance. Unless it is clear that clearance will lead to a significant net gain in overall habitat value, on balance clearance should not proceed.

46. It must also be noted that management strategies to deliver restored open habitats can take significant periods of time and resources to implement. Local communities sometimes respond to the perceived value of existing woodland and do not appreciate the potential value of restored habitat, particularly when that value in visual, recreational, landscape and biodiversity terms takes time to re-assert itself. It is not impossible to conceive of circumstances where, whilst the interests of biodiversity conservation might indicate the restoration of open habitats, community interests may indicate otherwise. There is a clear role for good consultation to determine what action to take and where and for good public communication to demonstrate to the public what is being done, why it is being done, the intended value and appearance of the result and what progress is being made towards this end. Planners routinely design and deliver such consultative processes and there is a potential role for planners in this sort of consultation.

Landscape

47. Questions 16 and 17

Your paragraphs 54 and 55 are strongly supported by the RTPI, which is heartened to see the degree to which the planning system and planning policy are recognised as a key tool in achieving landscape objectives and managing trees and afforestation for landscape purposes. Greater integration could possibly be achieved through cross references to the role of forests, trees and landscape considerations in respect of delivering sustainable development and urban design considerations (PPS1), housing (PPS3) or in rural areas (PPS7)? Stronger inter departmental links between DEFRA and DCLG might help here.

⁴ For Landcare see <http://webserver.dpie.gov.au/content/output.cfm?ObjectID=D2C48F86-BA1A-11A1-A2200060B0A04284&contType=outputs>. For catchment management see <http://www.dpi.vic.gov.au/dpi/vro/vrosite.nsf/pages/catchment> or <http://www.cma.nsw.gov.au/>

48. In terms of the government supporting its aims, the RTPI also considers that Environmental Stewardship and the Single Payment Scheme (Cross Compliance) could play an important role, alongside National Park and AONB management plans.

Social Sustainability

49. Paragraph 57 of the consultation paper recognises the value of trees and woodlands as social and community capital. They can inform our sense of place, and can be important to local and national culture and history. They add substantiality to the livability and hence quality of life to be derived from places. This analysis is sound and is strongly supported by the RTPI. The substantial social, environmental and economic benefits of trees and woodlands stand out well. The ideas expressed here are the stuff of planning policy and decision making and again, better recognition of the role that planning has in enabling these values to be identified and responded to in decision making would be a useful addition to the strategy.

Public Access to Woodlands and Health Issues

50. Questions 18, 19 and 20

Paragraph 58 of the consultation paper makes an important point about the value of nature close to where people live. The RTPI strongly supports the recognition of the public access and recreational value of woodlands, and also welcomes the acknowledgement of the role of the planning system in delivering this, through reference to PPG17.

51. Providing for equitable public access to woodlands should remain a strong national priority, providing a justification for planting in areas of deficit. Measures to identify areas and communities with an accessible woodland shortfall would be welcomed, as would measures to enable and promote access to woodlands by disabled people and other communities who experience for example, difficulty in accessing forests using private transport. The promotion of woodland recreation to underpin improved public health is again strongly supported.
52. Planning authorities are already encouraged to undertake local open space and recreational needs assessments in PPG17. The RTPI considers that there is scope for this advice to be better integrated with planning responses to nature conservation and the concept of developing green infrastructure for existing and new communities. Tree, woodland and forest issues should be integrated into local development framework policies for open space and natural environment management. Supplementary planning documents should be prepared to guide particular project opportunities arising from, for example, large scale brownfield and growth corridor development.
53. Social inclusion can be promoted through closer integration and working between owners, woodland organisations and local authorities. The Woodland Trust and Community Woodlands do and can continue to play an important part.⁵

Recreation

54. Question 21

The RTPI endorses the capacity of forests and woodlands to provide for high levels of different recreational activity, in a manner that is less possible in most open land settings. Mature woodland environments can often absorb high levels of recreational usage and associated visual and amenity change, without undue harm to the landscape values or the amenity of surrounding land uses. Activities such as cycling, trekking, walking, camping and caravanning are often more enjoyable for the user in a woodland setting and pose less concern to the neighbour by virtue of being accommodated in that setting.

55. It should remain a national priority to facilitate the use of woodlands for diverse recreational purposes. However, the quality of facilities should always be seen within a best value and sustainability context: what is the economic and environmental cost of providing the facilities as against the usage that can be made of them by communities. 'Gold plated' facilities in more remote locations that encourage longer vehicle trips

⁵ RTPI North West region have identified that Lancaster City Council some years ago created a series of small Community Woodlands around the district and considers that these could now be revisited to judge how far they have achieved their objectives.

and are less regularly useable by most people should be perceived as having intrinsically less value than more modest facilities, widely accessible to large and diverse populations.

Green Infrastructure

56. Questions 22, 23, 24 and 25

The RTPI fully supports the importance of trees within green infrastructure (your paragraph 65), together with the value of the social outputs alongside the physical resource base created (your paragraph 66).

57. The RTPI agrees 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. The key role of planning in identifying the need, nature, scale and locational requirements for such infrastructure, as part of local development framework, supplementary planning document and site master plan processes should be acknowledged. As part of this process, it is necessary to properly consider the integrated opportunities that emerge from green infrastructure related planting. In general terms, these will be:

- the better management of visual and acoustic impacts;
- landscape and amenity enhancement;
- improved access to enhanced habitats;
- the provision of new walking, cycling and riding routes; and
- the provision of quiet recreation opportunities.

58. A further opportunity to specifically highlight is that of green infrastructure providing alignments for sustainable urban drainage systems (SUDs). Whilst traditional urban drainage facilities do not necessarily support re-vegetation, accessibility or nature conservation value, new SUDs schemes can address all three requirements. Reedbed and wetland habitats, swales and spillways for urban run-off can be cheaper to design and operate than conventional urban drainage systems. At the same time, they can support significant opportunities for green corridor planting.

59. It remains important that green infrastructure is provided with the resources necessary for longer term management once it has been established. Often there is money in the capital budget to create and plant, but little in the revenue budget to maintain it. In this regard, the planning system can obtain open space and green infrastructure contributions to meet the needs generated by new use and development from developers under section 106 agreements – or possibly a forthcoming Planning Gain Supplement. The sums collected should be attributed to maintenance and enhancement in addition to creation. However, the use of such funding should be considered in tandem with other funding processes such as grant aid.

60. A number of UK cities already have strong green infrastructure policies in planning frameworks. The South-east London Green Chain⁶ provides an example of integrated use of woodland links for access, recreation, education and conservation, in a way that is strongly supported in planning policy. Sheffield's Green Wedge policies, supporting largely water course based vegetated corridors extending from the Peak District National Park into the city centre are worthy of examination. Overseas, the Green Wedge model taken in the Melbourne 2030 metropolitan strategy⁷ could be examined, as could Melbourne's approach to the integration of green infrastructure and SUDs systems (there known as Water Sensitive Urban Design or WSUD).

Managing Urban Trees

61. Question 26

Individual urban trees, avenues and other formal and informal street plantings can often make the difference between a streetscape that is apparently cluttered, bleak and visually unrewarding and one that is unified, pleasant and enjoyable to most users. These differences in impression can arise as between streets with very similar building stock. The value of trees in creating and maintaining this transformation is hard to over-emphasise.

⁶ <http://www.greenchain.com/>

⁷ <http://www.dse.vic.gov.au/melbourne2030online/>

62. It remains important to spatial planning and urban design that opportunities for street planting are maximised. Planning policies and development management processes (through landscape conditions to planning permissions and section 106 agreements) have a strong role to play here and this should be recognised.
63. However, success here is not simply a matter of planting new trees. Street trees live in a very hostile environment and experience high rates of damage and mortality. We also have a superb legacy of 18th and 19th century plantings that, in many cases, are moving rapidly to senescence. Revenue is needed for maintenance and capital investment in replacement. This is a necessary cost of providing liveable urban environments and should be recognised as such by government and local government, reducing the tendency for this area to be seen as a location from which economies can be derived. The RTPI's anecdotal view is that most local governments do have some expertise and technical resources for the management of their urban tree stock, although it should be noted that many rely on voluntary contributions and that whilst many tree officers are experts in the regulatory frameworks around trees, they are not necessarily experts in tree or woodland management. However, the main issue to be resolved is that of funding. Whilst the planning system and a possible Planning Gain Supplement could have a role to play here, it will not answer the broader need for resources, which are only likely to flow if government expresses street tree replacement and maintenance as being a higher priority than it currently is. Such a policy statement would in turn underpin high levels of local government commitment to this area.

The Historic Environment

64. Question 27

It is important to identify the regional and local balance between woodland and the historic environment, principally through closer links between English Heritage, the Forestry Commission, local planning authorities local woodland owners. The key issues are the identification of important historic woodlands and the consideration of woodland management/cropping impacts upon these, and the identification of important historic open landscapes and the putting in place of policy to ensure that afforestation of these and/or inappropriate planting types are avoided.

65. Tree preservation orders (TPOs) provide a solid and statutory mechanism by which to identify and protect historic or important trees that form part of the wider historic environment and PPG15 provides advice on their use in this role. PPG15 equivalently advises on the use of conservation powers in respect of trees in the historic built environment. The operation of these two sets of planning powers is clear and well explained. The loss of or planting of trees around scheduled ancient monuments, listed buildings and their curtilages are less clearly provided for, unless TPO or conservation area powers have also been used. Historic parks and gardens and battlefields lack statutory protection in the planning system unless TPO or conservation area powers have been used. There would be value in the preparation of clear good practice guidance to build on the advice provided in PPG15.
66. Further, whilst grant aid for planting and permission to fell can be withheld, there is no planning mechanism to prevent new afforestation that could significantly damage some types of historic place. This poses a wider question for the RTPI around the modernisation and harmonisation of our heritage protection provisions overall. The current regimes of tree preservation orders, conservation areas, listed buildings and scheduled ancient monuments is complex and does not provide for integrated designation and conservation management. There is considerable room for improvement, possibly entailing a move towards a unified conservation planning regime that enables planting and felling to be selectively controlled through the planning system, in locations where this is warranted. Whilst this matter is more core to the DCMS than it is to DEFRA, it nevertheless requires to be highlighted.
67. There was a period some 10 years ago when indicative forestry strategies prepared in partnership between the Forestry Commission and local government became a means of bringing forestry information including historic environment issues to bear on planning and forestry decision making. Whilst work on these appears to have proceeded apace in the Republic of Ireland and Scotland, a search discloses few new English examples. This is a field of practice that may warrant re-evaluation and promotion.

Economic Sustainability

68. Questions 28, 29 and 30

The RTPI has highlighted above its concerns that forestry should take place on a commercially sustainable footing, but that this objective is seriously challenged by world market failures in forest product value. Paragraphs 71 and 72 of the consultation paper recognise the economic potential of woodland, together with the poor economic situation at the moment.

69. The RTPI does not claim any particular expertise in forestry economics. However, it does support the encouragement of a healthy, profitable and sustainable forestry and woodland management sector, linked to the Rural Strategy (your paragraph 74), together with encouragement for biofuels development (your paragraph 75) and improved skills training (your paragraph 76). The role of the RDP and RDAs is correctly identified in the paper. Precise balances of market and skills development approaches are for others to suggest.

70. Paragraph 80 of the consultation paper on buying public benefits is supported, subject to the recognised need to retain the multiple value of woodlands in the face of pressures solely for timber production (your paragraph 81). It follows that the RTPI strongly agrees with the view expressed in question 30.

Summary Response

71. Questions 31 and 32

The RTPI considers that there should be no net loss in the forested area of England, but goes further to consider that a net gain is still an appropriate objective to seek at a national level, and a target would reinforce this.

72. The focus on sustainable woodland management is greatly to be welcomed. However, the RTPI cannot see why all woodland management should not be sustainable. It will be appropriate to have different sustainability measures. For example, in ancient semi-natural woodland, sustainability will represent the retention and future security of the floristic and faunal diversity of the woodland, whereas in a plantation forest, sustainability may be represented by a carbon neutral cropping cycle, sound markets for forest and fuel products, combined with the provision of appropriate access and leisure opportunities, amenity and nature conservation enhancements.

73. The RTPI supports the setting of relevant and spatially related regional and local targets. However, we consider that it does remain relevant for the Government to have a broad aim for woodland planting in England in order to provide national guidance for regional decisions. It should not be acceptable for one region to significantly lose forest coverage or under-achieve against net gain or accessibility targets, in a manner that increases expectations or pressures on an adjoining region. In short, there is a remaining need for a national target and a headline expectation of how this will be met at the regional level.

74. At the regional level, it is appropriate to identify specific priority areas where woodland cover is in deficit and needs to be expanded. This aim should be spatially expressed. It should for example be possible to map regions with forest resource and forest access deficits as a target to assist forest development.

75. At the local level, indicative forestry strategy or equivalent documents can add further spatial guidance, drawing in local data about historic and valued landscapes, monuments and buildings, local amenity, leisure and recreation requirements and opportunities and nature conservation issues. There is also scope to provide for specific holding plans, such as the biomass management plans identified above.

76. Targets should be set and monitored at all levels. Targets are measurable and they can become helpful indicators of steps towards sustainable development.