Nature Recovery Green Paper: Protected Sites and Species

CONFOR RESPONSE TO THE DEFRA CONSULTATION

Introduction

About Confor

Confor (www.confor.org.uk) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 members, representing the whole forestry and wood supply chain from tree nurseries to sawmills and wood panel businesses.

About this consultation

The UK Government has set out a new framework of environmental targets under the Environment Act 2021 (the Environment Act). This includes an ambitious target on species abundance, with the objective to halt the decline in nature by 2030.

The green paper outlines some areas where change is required to meet the nature recovery ambition. Government's overall aim is to move to an approach which focusses more on outcomes and recovery.

Confor welcomes the opportunity to respond to this consultation. Not all the questions have been answered. Confor has chosen not to submit a response online and requests that Defra accept this document as Confor's formal response.

Confor particularly welcomes the proposals:

- to place science above process in determining conservation outcomes,
- make space for calibrated judgments to be exercised on a case-by-case basis; and,
- move to an approach which focuses more on outcomes.

This response has also been informed by the positions and themes agreed by a convened cross-sector group comprising, alongside Confor, the Institute of Chartered Foresters, The Woodland Trust, The Country Land and Business Association, The Small Woods Association, The Royal Institute of Chartered Surveyors, and the Royal Forestry Society. From just two meetings we have a wealth of expertise and ideas about the challenges and opportunities for supporting the government's ambitions for nature and we would urge Defra to engage with us on this.

The main themes of the discussion, which Confor fully endorses, were as follows:

- Issues are not with the regulation itself but with its implementation
- There are serious resourcing and skills shortages in the public bodies
- Risk aversion in regulatory bodies hampers woodland creation efforts
- There are inconsistencies in regulatory process and application by geography and approach
- Better communication and collaborative working between agencies is needed
- Any merger or creation of a new body would risk loss of forestry capacity, momentum, expertise, and voice
- We need a comprehensive process for working through issues with existing regulation and

any proposed changes with the sector, including technical workshops on Environmental Impact Assessment (EIA) process.

Consultation questions

Q1. What is your name and correspondence address?

Caroline Ayre: caroline@confor.org.uk

Q2. Would you like your consultation response to be confidential? If you select 'yes,' please give your reason.

No

Q3. Please tell us in what capacity you are responding to the consultation by selecting from the following:

Sector trade body or membership organisation

Q4: If you are responding on behalf of an organisation, what is its name?

Confor: Promoting forestry and wood

Q5. Please indicate your specific areas of interest in responding to this consultation:

- Trees and forests
- Green finance
- Arm's length bodies
- Cost recovery
- Environmental impact assessment

Q6. Please indicate which location your response relates to, selecting from the following:

England.

Q7. What degree of reform do we need to ensure a simpler and more ecologically coherent network of terrestrial protected sites?

Option 3: The existing system could be simplified with consolidation of existing sites into one single type of protected site designation. This could reflect existing sorts of protections whilst offering an opportunity to convey the value and benefits of these sites more easily to people. This single designation could provide for a range and scale of protections for the respective site features and ecosystems tailored to the circumstances within the specific site. Consideration would need to be given to ensuring the right scale of protection for both the feature and its associated functional ecosystem. Exploring such scalable levels of protection within one type of designation could help support recovery through higher protection levels where needed. It could also offer scope to adapt sites more easily to climate change (for example, where features may be expected to move into or out of a site in response to changing climatic conditions) or enhance protections to areas of particularly significant nature value.

This option should allow for economic activity, i.e., tree planting and/or woodland management to be carried out on a case-by-case basis with the best scientific advice and best practice local stakeholder engagement.

Q8. What degree of reform for the marine protected area network do we need to meet our biodiversity objectives and commitments?

No comment.

Q9. Do you agree that there should be a single process for terrestrial designation?

Yes. The intention to have one consistent decision-making process as part of a rationalised site protection system is welcomed. This should rest with the appropriate authority informed by the scientific advice, based on evidence, of its statutory advisors and research bodies. Any new decision-making process must be fully transparent regarding the decisions taken.

Q10. Should we reform the current feature-based approach to site selection and management to also allow for more dynamic ecological processes?

Yes, for terrestrial sites only but on a case-by-case basis. The focus should be on how sites can be made more resilient to climate and other natural changes and encompass wider purposes such as carbon sequestration.

Confor recognises the recent interest in and support for rewilding as a means to deliver nature recovery. While we can see there could be a role for rewilding in certain situations, we are concerned that its general suitability and the benefits claimed for it can be exaggerated by its supporters. In the absence of much more robust evidence-based on experience of introducing and monitoring rewilding, Confor would strongly advise that its use be considered on a case-by-case basis and that consideration of alternatives be required before a decision is made that rewilding is the right course of action on a particular site.

Q11. How do we promote nature recovery beyond designated protected sites?

The restoration of habitat must ensure that there is no net loss of productive woodland cover in England. Confor has repeatedly asked for no net loss of productive woodland in England, and this is now even more vital as government forecasts show that wood supply in England will decline in the coming decades at the same time as demand for wood in England, the UK and globally increases. Continuing to reduce the area of productive woodland, instead of increasing it, will destroy green jobs in rural areas and put even more pressure on fragile forests overseas as European and global wood supply falls behind demand. While biodiversity overseas is outside the scope of this consultation, it is morally wrong to endanger biodiversity overseas by taking narrowly focused land-use decisions in England. Moving forward Confor believes it is imperative that further clearance of productive woodland is compensated for by planting of new productive woodland within the locality of the market for the wood that is lost, and that unlike now the new woodland planting is identified before clearance takes place to avoid it simply being lost as a condition over time.

Decisions on any further deforestation for habitat restoration should also take into consideration the ability of the woodland to support key species through effective management, such as, thinning, restructuring, or supplementary planting, rather than removal – the judgement should be made on

the potential of the woodland, not its current condition which is often the result of planting when standards didn't require provision of environmental benefit, whereas now detailed standards provide for multi-purpose management, including biodiversity benefits. Deforestation should be the last resort.

Q12. Do you see a potential role for additional designations?

The current system of land-based designations is complex and adding more would not solve anything. It is more important that the system we have now works for everyone or as discussed above is simplified.

Q13. Do you agree we should pursue the potential areas for reforms on assessments and consents?

No comment.

Q14. Should action be taken to address legacy consents?

No comment.

Q15. Should we move to this more outcomes-focused approach to site management?

The current purpose of the site consenting process is to stop protected sites deteriorating because of the impact of new activities. Any future protection process should also support the management of the site for nature recovery but look at the problems affecting these sites more strategically and in a more tailored way. Again, this should include best practice stakeholder engagement.

Q16. Do you have suggestions for how regulation 9 requirements should be reformed to support delivery of England's 2030 species target or other long term biodiversity targets and to improve our natural environment?

No comment.

Q17. Do you have suggestions for how processes under Regulation 6 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 and sections 125 to 127 of the Marine and Coastal Access Act 2009 together could better deliver outcomes for the MPA network?

No comment.

Q18. Do you have suggestions for improving the EIA scope and process for the Defra EIA regimes?

Yes, the Forestry EIA regime.

Confor's experience seems to be quite mixed geographically. In Northern England, members are finding that the increased requirements for pre-planting surveys (e.g., breeding waders, peat) are making schemes unviable economically, with huge added costs.

The key factors that drive the issues are:

- ALB staff are unwilling/unable to give clarity on when a survey is needed, leaving all the risk with the applicants. This means going above and beyond, with regular back and forth to get woodland creation schemes across the line. Consequent delays and costs lead to applicant

frustration and specific areas being removed from proposals or projects being dropped altogether.

- New staff (still growing experience) or lack of sufficient capacity to process EIA opinion requests fast enough. Sometimes the dynamic between Natural England and Forestry Commission does not help, with one agency supportive in one area and the other in another region. There should be a presumption in favour of planting that is UK Forestry Standard compliant with upfront stakeholder engagement.
- Poor quality data or data that is hard to access to make upfront decisions on suitable locations.

The EIA regulations themselves do not appear to be the issue. And very few schemes actually do an EIA. It is more how the regulations are implemented to get an opinion, both in speed, clarity, and willingness of ALBs. There should be sufficient reassurance that mistakes are not being made, but in a much more efficient way than present which clearly is not going to enable woodland expansion at the pace needed.

The situation could be improved by bringing more proportionality to the process. Currently small and uncontroversial schemes are subject to similar processes and requirements to larger more risky ones. Smaller, less risky projects should go through a more streamlined process than larger, more risky ones.

The inclusion of the EIA process within the application process for the England Woodland Creation Offer is a step forward. The existence of the Woodland Creation Planning Grant to help applicants formulate and pay for a UKFS compliant design plan for a new woodland is also helpful. However, the process is still very involved, and proportionality should be brought to bear on it as much as possible.

A more proportionate EIA process however should also be transparent and robust and require project proposers to provide evidence of early engagement with those, such as neighbouring property owners, who will be directly affected by woodland creation.

At a meeting of forestry stakeholder organisations prompted by this consultation, there was general agreement that the current EIA process clearly needs to be streamlined - but there was also agreement that it is of great importance to the sector to get the details right. For that reason, it is felt necessary that a specific technical working group is convened after this consultation to work through the detail.

Q19. What are your views on our proposal to establish priority areas for afforestation?

Confor welcomes a system that would ease administrative burden for afforestation projects. But experience from devolved nations would suggest that this could have a negative impact on increased woodland creation if the scoring layers within the Strategic Assessment only focus on nature recovery. A Strategic Assessment should also consider the benefits of tree planting and these benefits should be based on research and experience, not perceptions – for example planting a productive woodland is normally considered to provide no biodiversity value even though the UK Forestry Standard requires that biodiversity benefit be included in the design of all new woodland. Furthermore, even when there is recognition of this biodiversity benefit the area of productive woodland within a new woodland is normally dismissed as providing no biodiversity benefit. Confor's report on biodiversity in productive forests – based on published evidence and examples of current practice – shows that this dismissal is not based on the evidence.

The increased target for woodland cover in the Environmental Targets consultation will require land use change on a large scale. Woodland creation must become an appealing choice for farmers: DEFRA and Forestry Commission must concentrate their efforts on making good advice available and the woodland creation process more accessible and efficient than it is now. Part of the appeal will certainly come from the prospect of woodland bringing additional income streams to farms, so once again it is imperative that policy encourages multifunctional woodland that delivers environmental, nature, economic and social benefits.

Any Strategic Assessment must consider the products that increased woodland cover can provide, as follows:

- Using more timber products will have a positive difference for a more sustainable built environment, enabling it to contribute towards net zero.
- Using more wood also encourages a flourishing forestry industry which means more trees are planted, grown, and managed in a sustainable way.
- Each $1m^3$ of wood grown by a tree holds 0.9 tonnes of CO_2 'sequestered' from the atmosphere. Research has proven that conifers, as they grow faster, also absorb more carbon more quickly, and store it through long-life uses[1].
- Mature trees are harvested, and their carbon is captured and stored in buildings and other wood products.
- Wood products carry that stored carbon, captured from CO_2 in our atmosphere, for its entire life.
- Using wood instead of other materials saves CO_2 emissions, both through the carbon captured and stored in the wood product and the avoidance of using alternative CO_2-intensive materials.
- The manufacture of traditional materials such as steel or concrete creates very substantial CO_2 emissions. Meta-analyses of the average impact of using wood instead of concrete suggest an average reduction of 2.1 tons of carbon dioxide emissions per one ton of wood products used compared to concrete.
- Using wood in construction is a cost-effective solution to carbon capture. There is no need for man-made carbon capture technology to 'offset' carbon emissions when using timber.
- Timber products can be protected with additional treatments, repaired, reused, and recycled numerous times before they are at the end of their life. For example, a timber pallet could be repaired up to twelve times before it is turned into wood chips that can then be used to create a chipboard panel that may be used in construction - a wood product is easily recycled and reused, allowing the carbon it stores to stay 'locked away' for many years.
- We can keep planting more trees to replace wood products - and every tree planted captures more CO_2. In other words, such behaviour is truly sustainable, and can be continued into the indefinite future, enhancing rather than harming the planet's resources – unlike the vast majority of current commercial activities.

[1] Forster, E.J., Healey, J.R., Dymond, C. *et al.* (2021) Commercial afforestation can deliver effective climate change mitigation under multiple decarbonisation pathways. *Nature Communication* **12,** 3831 (2021). https://doi.org/10.1038/s41467-021-24084-x

It is vital to remember that achieving net zero will also help protect biodiversity, here and overseas. Productive woodland and increased wood production will provide places for biodiversity and provide part of the global solution to tackling climate change and biodiversity loss.

Carbon markets are an important driver for land use change, as are biodiversity and nature recovery. The 2021 Sylva Foundation's British Woodland Survey[2] showed that biodiversity and nature recovery are the main priorities for private woodland owners, but the only ones to create woodlands that are good for wildlife and biodiversity are those which also include timber production among their desired outcomes. Woodland owners want to help nature, but it is often wood production which provides the management plan and the income to deliver that benefit. For example, a review of woodland created over the past 20 years in the South West Forest[3] found that owners were unaware of the importance of active management and their woods were not providing an income stream, resulting in these young woodlands falling into disrepair and reduced benefits for biodiversity.

Therefore, it is crucial that any targets and policies leave behind the false dichotomy between native and productive woodland. Any new woodland created according to the UK Forestry Standard and managed by skilled forestry practitioners will deliver multiple benefits that are fundamental to achieve the net zero and nature recovery outcomes the Government is committed to.

Q20. What are your views on our proposed criteria to achieving our 30 by 30 commitment?

No comment.

Q21. What are your views on our proposal to reform forestry governance and strengthen protections for the Nation's Forests?

The key challenges facing the Public Forest Estate (PFE) are the increasing net cost of the estate at a time of enormous pressure on public finances, complex, and sometimes conflicting, stakeholder pressures, leading to a lack of clear and consistent direction; and the need to contribute to the transition to a low-carbon economy. Other challenges exist, as identified, but tackling these challenges should be a priority.

It is also vital that the management of the PFE recognises that it was developed primarily as a resource of timber and that has dictated the species make-up of these forests. With the introduction of the UK Forestry Standard in the late 1990s, the PFE has been managed for a wider range of benefits and the resource has adapted to conform to the UKFS. Any decision to fundamentally change the design of the PFE's forests to deliver increased biodiversity benefits at the expense of producing our ultimate environmental, renewable material – wood, has to consider both the origin of the PFE and the impact that reducing wood production will have on rural jobs and economies, on achieving net zero and on fragile forests overseas – see our answer to Question 11. A reprofiling of the PFE to increase biodiversity and reduce wood production would be better taken forward by repositioning the PFE through the sale of productive forests to the private sector where they can continue to produce vital

[2] Sylva Foundation, *British Woodland Survey.* *https://www.sylva.org.uk/bws*
[3] Diverse Regeneration Company, *Review of new planting under the South West Forest scheme.* *https://www.drcompany.co.uk/wp-content/uploads/2020/06/SW-Forest-Review-2020-minus-appendices-1.pdf*

supplies of wood and the purchase of land to plant forests that have a focus on biodiversity at their core.

At present there is an ongoing process, delivered through Forest Design Plans and repositioning, of changing the make-up and function of the PFE. In general, this process is resulting in more cost-incurring activity for environmental and recreational benefit, and a reduction in the estate's potential to generate income from timber sales. The financial effect of this trend has been masked in recent years by the rising availability of timber from the estate. In the next few years, the availability of timber from the estate will peak and then fall, and this will coincide with an extended period where government will be looking to cut back spending, putting real and increasing pressure on the funding of the estate.

The increasing cost burden is not helped by the fact that Forestry England (FE) has developed such a wide remit, with so many different, and often conflicting, strands of activity that it must be impossible to provide clear direction to the management of the estate. The estate, and indeed FE, would benefit from a simpler and clearer strategic direction based, in part, on an understanding of those aspects of its activity that may be better delivered by the private or charitable sectors.

Climate change has been identified by the UK Government as one of, if not the, biggest challenges facing the UK. "Business as usual" is not possible, and the actions required to meet legislative targets will be wide and far-reaching – lifestyle-changing, in fact. In that context there needs to be a fundamentally new approach to looking at the PFE. The forestry and wood-using sector is one of the few sectors that can positively support the transition to a low-carbon economy. It is one of the few industries that can claim that the more it produces, the greater carbon benefit it provides. FE needs to review its activity as a key component of the English forestry and wood-using industry. It is through stimulation of a growing, sustainable, financially viable forestry and wood-using business sector that the estate can provide its greatest public benefit. Doing so will also yield financial benefits that will help tackle the issue highlighted above of the increasing net costs of the estate.

The one activity that the PFE provides that has a negative (reducing) carbon effect is the provision of wood for material substitution and renewable energy. There needs to be a fundamental re-focussing of policy on retaining and enhancing the productive function of the estate, in parallel with an extension of productive activity in the private estate. This should not mean an abandoning of social and environmental objectives, but instead action to ensure that the low-carbon economy benefits of the estate are not reduced, but instead enhanced.

The PFE must have a programme of promoting the advantages of forestry to the wider public outlining the benefits it provides in terms of climate change and highlighting the need to use more wood from sustainable sources, especially to reduce carbon emissions through its use as a long-life product.

There is also a role for the estate in helping to understand how productive forestry can adapt to climate change through robust silvicultural management.

The value of sourcing locally is now widely understood. FE should promote and exploit this trend, especially in its timber marketing strategy; similarly, in the context of local heat and power generation.

Current Forest Design Plans for the PFE indicate that the trend seen over the last decade for an increase in the area of native un-productive woodland and open space in favour of a decrease in the

area of productive woodland (broadleaf and/or conifer) is set to continue. Public access and biodiversity issues increasingly dominate public policy that have in turn prompted a process of diversification in the PFE, stimulating reductions in the area of both public and private productive forest in England. With decreasing parliamentary support, increasing net costs and uncertainty over future funding, FE must question its modus operandi and the affordability of reducing its commercial production.

The PFE is the largest single manager of Ancient Woodland. PAWS are gradually being converted to native un-productive woodland under government's "Keepers of Time" policy. If current Forest Design Plans continue to be implemented, PFE's contribution to mitigating the impacts of climate change will continue to reduce. PFE must maximise its potential to address climate change implications through increased planting and sustainable management of its productive forest (broadleaf and conifer) area to sequester carbon, substitute other high-carbon products and provide renewable fuel feedstocks. Given the current cost of timber, proper management of ancient woodlands has been shown to be cost neutral, therefore saving government money. Active management of Ancient Woodland also includes addressing the proliferation of deer and grey squirrel, which are causing considerable damage.

Much of the annual increment on the PFE is harvested sustainably and supplies existing markets. FE is the largest single provider of timber to the market.

The biggest role the PFE can play is to continue to grow and supply, and increase its supplies of, timber to sequester carbon and substitute for carbon intensive materials. The PFE should promote and encourage the use of wood to the public. The estate should be used as a best practice exemplar of sustainable forest management that contributes to the development of a low carbon economy.

FE through its relationship with Forest Research and other forestry and timber research institutions must continue and improve upon its history of leading on experimental research and innovation. The highest priority issues for research identified by Confor Members through consultation with Forest Research is plant health and the challenges that climate change brings to responding to and identifying new pests and diseases; tree growth/silvicultural techniques for the production of quality timber for economic return; grey squirrel control; and deer control.

Q22. What are your views on our proposal to adjust forestry permanency requirements for certain project types?

We support a flexible approach to land-use permanency to encourage the uptake of tree planting by farmers and land managers, as long as the focus remains on establishing woodland, not only the initial tree planting phase. More flexibility could apply to short-rotation forestry and short-rotation coppice schemes, as well as agroforestry, but not restricted to these.

We do believe that any non-permanent woodland creation along the lines of what we suggest needs to comply with the UK Forestry Standard to guarantee the sustainability of any scheme and products deriving from it. We believe that UKFS-compliant Short Rotation Forestry (SFR) can play a key role in substituting the consumption of construction grade timber in biomass (woodchip) systems and supplying small dimension wood for wood panel production. Growing SRF, especially over the next

30-40 years when domestic availability is forecast to decline, will help the UK avoid increasing imports of wood (and an expected increase in the threat to fragile global forests.

Q23. Do you agree with the proposed changes to the UK Marine Strategy (UKMS) delivery programme, and if not, what other changes would you make to streamline the reporting of UKMS?

No comment.

Q24. Do you support the approach set out to split the high-level Good Environmental Status (GES) target into individual descriptor level GES targets?

No comment.

Q25. Do you agree we should pursue the potential areas for reforms for species?

No comment.

Q26. Based on your knowledge and experience please can you tick the criteria below that you think we should use to determine what level of protection a species should be given?

No comment**.**

Q27. What proposals should we look at to improve our current licensing regime?

No comment.

Q28. What proposals do you think would make our enforcement toolkit more effective at combatting wildlife offences?

No comment.

Q29. What are the most important functions and duties delivered by Defra group ALBs to support our long-term environmental goals?

The scientific, advisory, and operational expertise of Defra's ALBs is widely recognised, and it is important these functions are maintained throughout the afforestation effort. It is important that landowners and land managers, especially new entrants, have access to clear, consistent regulations and advice that is easy to navigate.

Q30. Where are there overlaps, duplication, or boundary issues between ALBs, or between ALBs and government?

No comment.

Q31. What are the benefits and risks of bringing all environmental regulation into a single body?

The establishment of Natural Resources Wales should be examined, not least because it has been a particular failure when it comes to forestry. Apart from the unplanned significant costs of establishing a single regulator and the loss of focus on good regulation through the extended process of preparing for and implementing the merger, there was a particularly damaging impact on the forestry sector. As staff moved between functions, people with forestry expertise became disillusioned and left the organisation and staff with no forestry experience came in and were unable to perform the tasks

required of their jobs. Tree planting levels collapsed and have yet to recover, and standards of service fell. The enthusiasm and motivation that staff felt being part of Forestry Commission Wales was lost, and unsurprisingly the cohort of professional foresters that were vital to the functioning of forestry grants and regulation did not feel part of the new, much bigger organisation with a much wider range of responsibilities. A fundamental pre-requisite of any change is a clear assessment of why change is needed and a full and objective assessment of options. Simply deciding on a proposition and then consulting on it is poor policy making and will undoubtedly lead to a sub-optimal outcome.

Any plan to create a single body to oversee all environmental regulation needs to include measures to avoid any loss of expertise and increase transparency in all dealings with stakeholders.

We share the concerns expressed by the cross-sector group that any merger of ALBs into one organisation is likely to result in a body unsure of its purpose and a substantial performance dip at a critical time for the environment, as has already happened in Wales.

Q32. What are the opportunities for consolidating environmental delivery functions into a single body? Which programmes and activities would this include?

Confor would advise in the strongest terms that this should not include forestry – see question 31. Our warnings were dismissed in the consultation on the establishment of Natural Resources Wales, but our warnings proved to be correct.

Q33.Please provide your views on how more effective cost recovery for regulation would affect:

a) environmental protections

b) businesses.

As stated above, a fundamental pre-requisite of any change is a clear assessment of why change is needed and what its desired outcomes are. Any fees and charges under consideration need to be designed to incentivise the desired outcomes. For example, disproportionate fees for felling licenses could discourage woodland management, which is one of the key drivers of healthy woodland and biodiversity gains. It is also important to consider the costs that landowners bear throughout the entire woodland creation process (for surveys and environmental impact assessments) and ensure that any cost recovery effort does not discourage afforestation.

Q34. What is the most efficient way of ensuring businesses and regulated persons pay an appropriate share of the cost of regulation?

Paying for regulation assumes that those being regulated are making an income, ideally a surplus, from the regulated activity and can therefore afford to contribute to the cost of regulation. Woodland owners in England are being expected to provide increasing non-economic benefits without any financial compensation from the public purse. Applying charges will have the effect of disincentivising management of woodland – contrary to government policy.

Q34. What is the most efficient way of ensuring businesses and regulated persons pay an appropriate share of the cost of regulation?

Cost recovery for environmental regulation, such as paying for felling licences, seems to be creating more barriers, when we already know there are too many. This is another area of this set of

proposals where we urge caution and the critical need to consider regulation holistically, in detailed, technical consultation with the sector – no single proposal can be considered or decided on in isolation. Applying charges will have the effect of disincentivising management of woodland – contrary to government policy.

Q35. What mechanisms should government explore to incentivise the private sector to shift towards nature-positive operations and investment?

The forestry sector already delivers nature positive management through the UK Forestry Standard, and in doing so is far ahead of other sectors. The environmental/nature/species benefits of management against UKFS are generally poorly understood and conservation/environmental organisations often comment that the UKFS should be 'strengthened' to provide 'greater' nature benefit. Before changing the UKFS it is vital that there is an evidence-based understanding of the benefit that is currently provided, and an impact assessment is made of any proposed changes as it is easy for single-issue lobbyists to disregard the impacts of narrowly focused changes on the provision of other important benefits. In the early days of the UK Woodland Assurance Standard conservation organisations lobbied for a reduction in the size of clear-fells, arguing 'the smaller the better.' Shortly afterwards there was a request to reverse this approach by the same organisations as they realised that this approach would harm rare species of birds – wood lark and nightingale.

Q36. What level of regulation is needed to incentivise private investment in nature while ensuring additionality and environmental integrity?

No comment.

Q37. What financial impact do you think the proposals set out in this green paper would have either on business (For example, landowners) or government?

Any proposal that further reduces the availability of sustainably produced wood in England will see rural businesses close and jobs lost. Particularly at threat will be wood processing businesses which require a minimum amount of wood to remain viable. The loss of these businesses will then have a knock-on effect removing the market for wood from local woodlands and prompting them to become unmanaged. A reduction in the availability of wood will also undermine attempts to achieve net zero and necessarily drive greater imports of wood from overseas and increase the pressure on fragile global forests.