



**Briefing: Freedom of Information submission re: government disposal proposal for Public Forest Estate and related questions to conservation bodies – 5/10/11**

Our Forests submitted a set of questions under the terms of the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 relating to the proposed sale and disposal of the Public Forest Estate (PFE) in England on 29<sup>th</sup> July 2011 <sup>i</sup>.

The questions were sent to Government via:

- Defra
- Forestry Commission
- Independent Panel on Forestry.

Simultaneously two supplementary questions were sent to organisations that had been reported or alleged to have been considered by Government or expressed an interest themselves in taking on parts of the PFE:

- The National Trust
- RSPB
- The Wildlife Trusts
- The Woodland Trust.

**The initial submission was sent by e-mail to all the above on 29<sup>th</sup> July 2011.**

The first body to respond was the Forestry Commission, acknowledging receipt of the request on Tuesday, 2<sup>nd</sup> August – within two working days.

**Order of other responses:**

- The Woodland Trust on 5<sup>th</sup> August 2011 - within 5 working days
- Defra on 25<sup>th</sup> August - exactly 20 days after the request had been submitted
- RSPB on 31<sup>st</sup> August - 23 working days after initial request
- The Wildlife Trusts also on 31<sup>st</sup> August, as per RSPB
- National Trust also on 31<sup>st</sup> August, as per RSPB and Wildlife Trusts.

The prescribed timeline for responding to both Freedom of Information Requests and those under the Environmental Information Regulations are set out on the Information Commissioner's Office website as follows <sup>ii</sup>:

**Freedom of Information request**

*"You must respond to requests for information promptly and usually within 20 working days. The first day of the 20 is the first working day after the request was received. If you have asked the requestor to clarify the request, the 20 days start on the day when you receive the clarification.*

*If you are withholding the information by applying an exemption for which you need to consider the public interest test, you may extend your time for considering release of the information but we recommend that this does not take more than 40 working days in total. You must still inform the applicant that you are doing this before the initial 20 working days are up and give an estimated time for response.*

### **Environmental Information Regulations**

*When you receive a request you must respond to the applicant in writing as soon as possible and within 20 working days. As with the Freedom of Information Act, the first day of the 20 is the first working day after the request was received.*

*Within that time you must either:*

- *make the information available;*
- *refuse to provide it with reference to the exceptions;*
- *ask for clarification;*
- *notify the applicant that there is a charge for making the information available; or inform the applicant that you need more time to respond because of the complexity or volume of the information. The time limit can be extended to 40 working days if the complexity or volume of the information requested means that it is impracticable to respond within 20 days, but if so, you must notify the applicant of this within 20 days.*

*If you have asked the requestor to clarify the request, the 20 days do not start until the day when you receive the clarification.*

*Unlike the Freedom of Information Act, under the Environmental Information Regulations the time limit cannot be extended to carry out the public interest test.<sup>iii</sup>*

### **Relating those timelines to Our Forests submission:**

- Questions sent by email by 1.00pm, Friday 29<sup>th</sup> July
- 20 working day period for initial response begins, Monday 1<sup>st</sup> August
- Our Forests provides clarification as requested by Forestry Commission on Friday, 5<sup>th</sup> August
- 20 working days from 5<sup>th</sup> August = 5<sup>th</sup> September (allowing for Bank Holiday, 29<sup>th</sup> August)
- If the time limit is extended (as it was) to a total of 40 working days due to claims of 'complexity' then the additional 20 working days allowed from 5<sup>th</sup> September would extend the time limit for responding to **Monday, October 3<sup>rd</sup>**.

**No official final response has been provided to Our Forests as of the publication of this briefing – 5<sup>th</sup> October 2011.**

### **Responses received to date from government bodies and their reasons for delay:**

#### **Forestry Commission**

The Forestry Commission, the first of either government bodies or NGOs to acknowledge receipt of our submission, initially stated confidently that once we had provided them with clarification as to the specific period of time over which we were seeking answers that, ***“we will be able to sort this out fairly quickly.”<sup>iv</sup>***

On 5<sup>th</sup> August, Our Forests indicated that the period we were interested in ran from 1<sup>st</sup> January 2010 up until the date of our submission, the Forestry Commission official responded, ***“Thanks for the clarification on dates, we are working to draw this information together now.”***

From that promising start, things began to deteriorate. On 5<sup>th</sup> September, the date Our Forests had been told initially that we would get a response; instead we received the following letter:

***Subject: Freedom of Information Request - Ref: OF290711***

*When I contacted you on 2 August I explained that under the Environmental Information Regulations we had 20 working days from the time of clarification to reply to your request for information. This means that we should be sending you a reply today, unless the case is a 'particularly complex request' which is not defined in the regulations.*

*Your request has been complicated by the need to check details with members of Commission staff who have been on annual leave which means, unfortunately, that we are unable to reply today. However, as everyone I need to check with has now returned from leave I fully expect to be able to provide a substantive response by Wednesday 14 September.*

*I am very sorry for this delay, but I do hope you will understand why we have not been able to fulfil your request within the normal time scale.*

*Regards*

*Executive Office  
Forestry Commission England*

**September 14<sup>th</sup> came and went. On September 15<sup>th</sup> Our Forests contacted the Forestry Commission and was told that the matter was now being dealt with by Defra.**

**Defra**

The Government department to which the Forestry Commission reports, did not acknowledge Our Forests submission until the final day of the legally set 20-day initial response period, Thursday, 25<sup>th</sup> August. The official responding stated that it would have been conceivable for our submitted request to have received official answers within that initial 20-day period. Instead, we were informed that an extension would be needed due to the 'complexity' of our request:

*"Thank you for your 29 July 2011 request for information about any meetings, site visits and discussions that the government may have held with both national and overseas organisations relating to them taking on ownership of the Public Forest Estate in England.*

*You also requested information on average costs for the management of the Public Forest Estate, and how these costs varied under three different scenarios. As you know, we are handling your request under the Environmental Information Regulations 2004 (EIRs). I am writing to advise you that the time limit for responding to your request for information under the EIRs needs to be extended.*

*Regulation 7(1) allows the public authority to extend the period of 20 working days referred to in the provisions in paragraph (2) to 40 working days if it reasonably believes*

*that the complexity and volume of the information requested means that it is impracticable either to comply with the request within the earlier period or to make a decision to refuse to do so. In this case, I regret that we must extend the time limit for responding from the original deadline of 26 August 2011, because of the complexity of your request, which means we are unable to verify what information held, wick (sic) falls within scope of your request.*

*I hope to let you have a response by 16 September 2011 at the latest.”*

**Our Forests contacted Defra on 16<sup>th</sup> September. Receiving no reply, we followed up a week later on 23<sup>rd</sup> September and received the following response:**

**Subject: RE: RFI 4166: Freedom of Information Request - Your ref: OF290711**

*“Thanks for both your email of today and last Friday (16<sup>th</sup>). I’m sorry I haven’t got back to you before now, but there is nothing new to say at this stage. I will keep you informed of progress and will definitely be in contact next week regarding our response.*

*Apologies again for the delay.”*

**Our Forests has not been kept informed of progress or contacted since that last email of 23<sup>rd</sup> September.**

**NGO (Non-Governmental Organisation) responses to Our Forests requests for clarification on their position on the Government’s initial proposed disposal of the Public Forest Estate and any discussions or meetings they had with government officials as to taking on any part of the public woodlands and forests.**

Initially, the official bodies appeared to be responding more rapidly and with the stated intention of providing answers to our questions than the NGOs. As you would expect, given that government agencies and departments, unlike the NGOs, are bound by the processes and protocols set out under the Freedom of Information Act and Environmental Information Regulations. However, after an encouraging initial response, official responses dried up.

Unlike the government bodies, the NGOs are not bound by the terms and timelines of either the Freedom of Information Act or Environmental Information Regulations. Although you might expect such groups to be inclined to support and adhere to the principles of transparency in and public access to policy-making that affects the public interest. Unlike several other NGOs<sup>v</sup>, none of those organisations involved in or alleged to be in discussions with Government over the disposal of the Public Forest Estate are declared supporters of the Campaign for Freedom of Information (instrumental in bringing the Freedom of Information Act into being).

The NGOs took their time to respond to Our Forests, with the exception of The Woodland Trust, all fell outside the official 20-day guideline. But all have now provided detailed responses to Our Forests questions, for which we are grateful. Below we provide each organisation’s response in full as sent to us, so that their replies can be seen in the whole and not edited or mediated. Only names of any other staff mentioned in the letters have been removed where these have no bearing on the overall response

However, until Our Forests receives the official record of discussions and meetings with all parties (UK NGOs and any other bodies, here or overseas) relating to the proposed disposal of the Public Forest Estate, it is difficult to judge how comprehensive these responses are.

**Questions put directly to NGOs:**

*“Have you or any of your staff met or otherwise communicated with any representatives of this Government or their officials (including Forestry Commission staff) at any point over the past 15 months to discuss your organisation taking on - under whatever arrangements - any parts of the current Forestry Commission Public Forest Estate?”*

*If so, please specify the date when you met, what was discussed and any agreed outcomes.*

*Please can you also provide the average management costs per hectare for any woods, forests - including other habitats being restored from former or presently planted up woodland (i.e. restoration of plantation ancient woodland sites, heathland etc.)- that lie within your organisation’s land holding.”*

**In order of responding:**

**1. The Woodland Trust – received 5th Aug 2011 from Sue Holden, director:**  
*...has passed on the two questions that you've asked and I am happy to give you an overview of events from the Woodland Trust's perspective as the threat to the public forest estate unfolded.*

*As you know, from the beginning we were concerned about the consequences of a mass disposal for wildlife and for people. We felt that the issue, on which we as a conservation charity place huge emphasis, around the lack of protection of public benefit that affect all woods would be vastly accelerated if sales went ahead. So we focused around the need to secure ancient woodland protection and restoration and the need for woodland expansion. We support the principle of a public forest estate but we also feel strongly that the current estate does not offer enough public benefit to enough people and therefore we felt some change to the estate would be acceptable perhaps selling some sites of little public benefit in order that woods offering greater public benefit be created.*

*Once the consultation launched David Cameron said publically he felt the National Trust and the Woodland Trust could do a better job for the public forest estate. Let me reassure you that we were as astonished by this as anyone else - we had not, nor have we since, expressed such a view or ambition! The FC do a good job of managing very complex heritage and multi-purpose forests though we do wish they had started restoring more of their planted ancient woods (PAWS) and creating more woods near to where people live. We have of course told them this as we do meet FC colleagues regularly.*

*As I recall, we had two or three discussions with DEFRA staff as we continued our public campaign around the consultation with direct lobbying around the Public Bodies Bill. But, we told them that we are not 'acquisitive' and I also said this to the Secretary of State at the one meeting I've had with her, which was in February. We do not want to take on the public forest estate and being practical, we don't have the finances to buy or*

*manage even a small chunk of it! Our strategic plan states that we will aim to acquire one significant site in the period 2009-2013 and doing this will take considerable fundraising effort. The one offer we did make to DEFRA was that we would consider working in partnership to ensure the restoration of the public planted ancient woods, using our PAWS team who now have considerable experience of helping woodland owners implement restoration programmes.*

*As different scenarios for 'disposal' started to become apparent, our concern grew for the future of the PAWS estate in particular. The 'categorisations' used for woods in the consultation clearly stripped PAWS of its conservation status, creating a real threat to future restoration. We did express these concerns to government. We also wrote to Jim Paice asking him to stop the public forest sales that were continuing during the consultation. Sales were stopped.*

*Throughout discussions we have always honoured our charitable aims and focussed on protection, restoration and woodland creation. For us it is about protecting what we have - both for wildlife and for people, and working out how to gain more from trees and woods for society and the environment.*

*Your second question is difficult to answer. Our 1200 woods range from a large collection of urban woods in Warrington and Runcorn, where management costs might be £1000 per hectare per year to large woods in Scotland where costs might be as little as £20 per hectare. We have tried benchmarking ourselves with others in the past but concluded that each organisation is a very different animal, with different objectives for woods and importantly very different estates so comparison was unhelpful. Likewise restoration can range from costing nothing, where costs are covered by the conifers extracted, to hundreds of pounds per hectare where trees have to be removed from very steep upland hills by horse!*

*I'm sorry it's a lengthy answer but when you've been caring for, and concerned about, woods for 40 years, as the Woodland Trust has, there's a lot to say!*

*All the best,  
Sue*

#### **Our Forests' analysis and comments:**

Good to see Woodland Trust come out and states that it *'supports the principle of a public forest estate'*. During the height of the public outcry against the disposal plans, neither the Woodland Trust nor any other of the major conservation NGOs made any such unequivocal statements supporting the principle of there being a coherent body of woods and forests managed consistently and sustainably on behalf of the public.

Distancing the Woodland Trust from David Cameron: A key cause of concern and suspicion about the motives and possible involvement of the various conservation bodies with the government's disposal plans stems from the statement made by the Prime Minister in the House of Commons in February, 2011, ***"I am, of course, listening to all the arguments that are being put on this matter. However, I ask whether there are organisations, such as the Woodland Trust and the National Trust that could do a better job than the Forestry Commission. I believe that there are."***<sup>vi</sup>

Sue Holden's response to Our Forests is strong on this point, ***"Once the consultation launched David Cameron said publically he felt the National Trust and the***

***Woodland Trust could do a better job for the public forest estate. Let me reassure you that we were as astonished by this as anyone else - we had not, nor have we since, expressed such a view or ambition!***

Acknowledgement of the Forestry Commission's competence: *"The FC do a good job of managing very complex heritage and multi-purpose forests though we do wish they had started restoring more of their planted ancient woods (PAWS) and creating more woods near to where people live."*

**Fact:** The Forestry Commission is the best manager of key wildlife sites (Sites of Special Scientific Interest, SSSIs) in the country ahead of not just The Woodland Trust, but all the conservation organisations. 99% of SSSIs managed by the Forestry Commission are in top condition.

**Fact:** The PFE includes just under 50,000 hectares categorised as Ancient Woodland. All ancient woodland areas that have been previously planted up with non-native species (Plantation Ancient Woodland Sites PAWS) are in the process of being restored, apart from exceptional areas such as arboreta or exceptional stands of conifers.<sup>vi</sup>

**Fact:** Between 1999 and 2008 the population of England who had access to Forestry Commission public forest estate woodlands within 500 metre, 4 kilometre and 10 kilometre catchments increased by 34%, 30% and 22% respectively.<sup>viii</sup> The respected independent economic assessment of the FC PFE also noted this welcome increased access for urban populations to public woods, *"There has been a significant increase in the availability of PFE woodlands within 500m, 4km and 10km of population centroids."*<sup>ix</sup>

**Meetings with Defra officials:** *"...we told them that we are not 'acquisitive' and I also said this to the Secretary of State at the one meeting I've had with her, which was in February. We do not want to take on the public forest estate and being practical, we don't have the finances to buy or manage even a small chunk of it! That sounds clear enough that the Woodland Trust did meet with officials. But did those officials put it to the Woodland Trust that they might take on some PFE woods and forests? Sue Holden's answer is not entirely clear in stating that she told the Secretary of State, 'we are not acquisitive' and 'do not want to take on the public forest estate'.*

Was the Woodland Trust open to offers if government alleviated the problem of the Trust not having the finances itself to make outright purchases?

Our Forests received an anonymous allegation relating to this, which claimed that Woodland Trust representatives at that meeting with Caroline Spelman, informed her that the Woodland Trust could not take any of the Forestry Commission ancient woodland sites *'without a massive endowment'*. We accept that this may be nothing more than a mis-informed or mischievous rumour – but dispelling such rumours depends on unequivocal clarity from both Government and the NGOs.

**Management Costs:** *"Our 1200 woods range from a large collection of urban woods in Warrington and Runcorn, where management costs might be £1000 per hectare per year to large woods in Scotland where costs might be as little as £20 per hectare."*

The Forestry Commission manages over 1,500 woods, forests and other land covering 258,000 hectares at an overall final cost to the public via central government funding of £14 -15 million per annum (2009 figures – cut to £10 million for 2010/11), spread across the whole estate averages out at c. £56 per hectare. However, costs vary considerably for different woodland sites depending on range of outputs – and are at least three times higher for woodland in or close to urban areas than rural woodland. Figures for sites in the South East, catering for high visitor numbers stand at c. £77 per hectare. Overall management costs for some newly restored urban community woodland sites in the North West have been estimated at reaching over £500 per hectare.<sup>x</sup>

In comparison, the Woodland Trust (WT) owns/manages over 1,000 woods – totalling c. 23,100 hectares in England. In 2009, WT received £1.2 million in grants via the Forestry Commission in 2009 and £1.0m in 2010 (England Woodland Grant Scheme) and with other public grants received a total of c. £2 million. Those figures would appear to put their woodland management costs in the order of c. £95 - 120 per hectare.<sup>xi</sup> WT's sites generally compromise small woods with a basic level access (car park and some paths), but rarely rangers on-site. The figure of £1,000 per hectare for urban woods is double that of the urban and community woodlands the FC manages.

#### **Questions that remain unanswered**

- Did the Woodland Trust consider and discuss with officials taking on any part of the PFE before it was clear that the majority of the public were against any disposals or transfers of ownership?
- Was the Woodland Trust open to taking on areas of ancient woodland on the PFE if provided with public funds to do so?

#### **2. RSPB response – received 31st August 2011, from Dr Mike Clarke, director**

*“I am very sorry for my slow response in replying to your message, which arrived while I was on leave.*

*While I am happy to address the issues you raise regarding the role of the RSPB and the future of the Public Forest Estate (PFE), the context of your questions is unclear to me (although I have read your website). You say that your request is an ‘official’ one. I would be grateful if you would explain the ‘official’ status of Our Forests, and how Our Forests determines its public position. I also hope you won’t mind if I ask a few questions of Our Forests in return.*

*I trust you know I am keen that we work together for the best interests of people, wildlife and our national heritage. I hope we can do this and I think it would be more helpful to talk through a range of issues, rather than attempt to do so by lengthy email.*

*Perhaps you would let me know the most convenient times you have to speak on the phone. We could arrange to have a chat. I understand that XX will be seeing you shortly, and that would be a chance to establish how we develop a better understanding of our respective concerns and objectives. Meanwhile, I have set out below what our position has been, and continues to be, on the matters you raise in your email.*

*As you know, the RSPB welcomed both the launch of Our Forests and the mobilisation of public support around an environmental issue. The RSPB has campaigned for over 30*



*years on the full spectrum of forestry issues, from policy and legislation through to practical forestry management. Our first major public campaign on forestry was in 1982. We are also practitioners. We manage woodlands on our own land, as well as working on woodlands owned by the Forestry Commission, local authorities, other charities and private landowners, including the provision of public access and education facilities.*

*The PFE is a legacy of past Government forestry policies. We touched on this at the very first stop on the site visit to The Forest of Dean. These policies in the past have led to large-scale habitat destruction and loss of amenity – alien tree species planted on heaths, peatlands, and grasslands, and the wholesale clear-felling and destruction of ancient native woodland.*

*Campaigning by many civil society organisations, including RSPB, led in 1991 to the adoption of ‘multi-purpose forestry’ to counter the impacts of production forestry on the public heritage. The most recent (2007) English forestry strategy set out many laudable environmental policy objectives, but has now been withdrawn by the current administration.*

*Progress remains slow. For example, despite policy commitments, there is still about 35,000ha of ancient woodland which was cleared of native species and is not yet being restored on the PFE. Similarly, 30,000ha of lowland heathland remains covered by conifer plantations on the PFE.*

*Over 20 years, in our view the Government and its agencies have not provided effective mechanisms to achieve its policy objectives on a large enough scale, in sufficient quality, or in a targeted manner. Many of the problems we have highlighted over the past three decades are exacerbated by issues inherent in the purpose, structure and funding of the Forestry Commission.*

*We remain concerned about the ability of the current institutional arrangements to put this “multi-purpose” policy into effect, especially since funding for the public forest estate has been cut by around one-third.*

*So my questions to Our Forests are*

*What, if any, improvements in outcomes are you seeking for the PFE?*

*What is the view of Our Forests on the current funding, structure, targets and priorities of the Forestry Commission?*

*What is your position on the large areas of woodland managed by other public bodies (e.g. MoD and local authorities) and charities?*

*What is the position of Our Forests, in terms of public benefit delivery, on the extensive areas of land held by the FC on long (999 year) leases which restrict other activities than production forestry?*

*I am concerned, and have been for some time, that some of the issues surrounding England’s public forests have been oversimplified during the course of the debate. While these simplifications were helpful in mobilising support and preventing the wholesale disposal of the public forests, there is now a risk that failing to consider some of the complexities may not be in the best long-term interests of these precious landscapes. We should all avoid the risk of confusing – or conflating – them.*

*The RSPB identified the following priorities and outcomes for the PFE in its response to*

*the Independent Panel's "call for views":*

*Enhance wildlife, access, landscape and historic environment value of a range of woodland types, including by the restructuring of non-native conifer plantations. There could be economic and social, as well as environmental benefits to doing this.*

*Protect and enhance biodiversity of existing native woods and associated important wildlife species.*

*Restore important habitats that have been overplanted with unsuitable trees, including ancient semi-natural woodland sites, lowland heathland, peatland habitats, semi-natural grassland and sites for breeding wading birds.*

*Expand woodland that protects important wildlife. Opportunities should be sought to buffer and expand priority native woodland habitats. The restoration of native woods on ancient woodland sites should be a key task.*

*Improve access to public woodland, with the purpose of improving the quality of life of communities via increased contact with nature. Provide opportunities for recreation and relaxation. Bring more children into contact with nature, ensuring that the environment is valued and understood by future generations.*

*It follows that the organisational structure that manages our woodlands needs to be determined by these outcomes, not vice versa.*

*You asked whether we have held discussions regarding the acquisition of land in the Public Forest Estate. The short answer to this is: not in the context of the Government's erstwhile desire to sell or outsource management of the PFE on a wholesale basis.*

*The longer answer is that we were contacted informally by the Forestry Commission's then Chief Executive, last autumn. In scoping possible options ahead of the Government's anticipated proposals, he asked whether RSPB would express an interest in any sites that we might be prepared to take on. We declined to respond, as we were – and still are - opposed to the freehold disposal of state-owned land. I will return to this subject later on.*

*Your question suggests a lack of understanding about the way the RSPB already works in partnership with the Forestry Commission, and I hope I can clarify things here. The Forestry Commission has worked for years with many other organisations in order to achieve its targets and objectives. The RSPB is one of these organisations.*

*It is the RSPB's belief that, where public land has existing or potential natural environment "value", we wish to see that value realised. If the Forestry Commission had the capacity to realise this value without our assistance, we would not seek to be involved. We only spend our funds where they are most needed and where they can be most effective.*

*As I indicated above, our involvement in the management of land owned by public bodies varies significantly. It can range from setting up public access or educational activities, such as Dates with Nature, guided walks or field teaching, species reintroduction programmes (e.g. red kites at Top Lodge, Northamptonshire), through to large-scale land management.*

*Sometimes the nature of the partnership means that long-term leases and management agreements are the most appropriate way of proceeding. As we invest considerable human and financial resources in such projects, we have a responsibility to request some security of tenure in return for that investment. To do otherwise would be irresponsible.*

*I hope you would agree that a good example of this type of arrangement are the Nagshead nature reserve in The Forest of Dean, which we manage on behalf of the Forestry Commission as Ancient Woodland, and another is parts of Dunwich Forest in Suffolk, where we are restoring conifer forest to heathland.*

*There are areas of the PFE that we believe should be restored to high quality natural habitat to deliver even greater public benefits than at present, where the Forestry Commission has been either unwilling or unable to carry this out. Thus, there are instances where we have sought agreements with the Forestry Commission to realise this benefit more rapidly than would otherwise be the case, in order to demonstrate the public benefits of habitat restoration. These have resulted in specific discussions with FC about the transfer of specific land.*

*For example, in Dorset, we have sought for nearly a decade to establish a landscape restoration project, building on smaller-scale partnership work between the Forestry Commission and the RSPB. We regret that, to date, we have been unsuccessful in persuading them to take this forward, with the result that the public benefits of this land continue to be unrealised. These discussions pre-date by many years the current Government's consultation on the future of England's public forests.*

*For completeness, I would also point out that, during the 15-month timescale of your question, we did complete the successful purchase of some 2,000 hectares of land in the Flow Country of Scotland, with a view to restoring this to active blanket bog. RSPB has played a role in remedying past damage, with UK and EU support, over many years, a programme that pre-dates the recent Government process.*

*So, we do speak to the Forestry Commission regularly about management of public land, because we are already involved in it, and have been for many years. However, we have not spoken to them about taking on land as part of any "fire sale", and declined to express an interest in doing so when we were approached.*

*I wish to make the RSPB's position on the disposal and acquisition of land absolutely clear to avoid any suggestion that we have a hidden agenda in this respect.*

*As a charity, we are generally wary of taking on the management of public land ourselves, because of the costs and liabilities. At the same time, we are opposed to any proposal by the Government to offer land for freehold sale on the open market, with the risk that the public benefits derived from this land will be compromised or lost, and the risk that the Government avoids fulfilling its international obligations for nature conservation.*

*These views informed the earlier set of principles for the disposal of public land, published by the RSPB and a number of other conservation NGOs in the aftermath of the Comprehensive Spending Review. We felt at the time that the Government had made an incorrect assumption that charities would be able to take on the management of public land. We also believed that they had seriously underestimated the complexity and costs of the process involved. The document is available online at:*

[http://www.rspb.org.uk/Images/Principles%20for%20public%20sector%20land\\_tcm9-269966.pdf](http://www.rspb.org.uk/Images/Principles%20for%20public%20sector%20land_tcm9-269966.pdf)

*Some seem to have interpreted this document as a set of bid conditions from NGOs wishing to take on public land. This was never the case – they were a challenge to a Government that had made an incorrect assumption that charities would be able to take on the management of public land. We believed that they had seriously underestimated the complexity and costs of the process involved.*

*With regard to your second question concerning management costs, it is difficult for me to provide you with the all information you seek. This is because we manage many sites with woodland – over 8 000ha across over 100 sites – which are often mixed with other habitats. We monitor costs of our reserves principally by site rather than by habitat type, and our analysis has shown that site-specific factors are a major influence on the costs of management. The RSPB has done its best to present heathland restoration cost data in a way that would be helpful to managers and policy-makers. Most of this data is derived either from our nature reserves or our Dorset heathland project, which undertakes a series of management tasks on third party land, including the Forestry Commission. Our data helps underpin the costings for heathland management presented as part of the UK Biodiversity Action Plan. You will also find detailed costings in Appendix 8 of the RSPB's lowland heathland habitat management handbook. I am happy to send on a photocopy if this would be helpful."*

#### **Our Forests' analysis and comments:**

Our Forests is grateful for the director of the RSPB in providing such a detailed response to our questions.

**RSPB Questions to Our Forests:** Our Forests role, see statement at end of this briefing. Our Forests does not describe itself as any form of 'official body', but rather a 'ginger-group' set up by a number of individuals concerned at the lack of transparency over the proposed disposal of the Public Forest Estate. Our overall objective in forming Our Forests was to ensure that the views of the over 530,000 people objecting to the disposal proposal are heard. A document setting out possible future scenarios for the Public Forest Estate is currently in progress, which we hope will answer some of the RSPB's specific questions.

**Over-simplification of debate:** This reads slightly as pique from a large, powerful and usually very effective conservation body that in the case of the PFE disposal proposals failed to read or be in tune with the public mood. That over 530,000 signatures were garnered in a matter of months by 38 Degrees against the disposal proposals is evident of the strength of public feeling, and reflects the fact that none of the NGOs came off the fence early in the public campaign and declared themselves against the Government's proposals and supporting as a point of principle that there were public goods and values inherent in the PFE as managed by the Forestry Commission.

**Possible acquisition of land:** The RSPB notably amongst the NGOs openly and clearly states that it was approached '*informally*' by the then Chief Executive of the Forestry Commission as to possible interest in taking on some sites from the PFE:

*"...we were contacted informally by the Forestry Commission's then Chief Executive, last autumn. In scoping possible options ahead of the Government's anticipated proposals, he asked whether RSPB would express an interest in any sites that we might be*

*prepared to take on. We declined to respond, as we were – and still are - opposed to the freehold disposal of state-owned land.”*

The RSPB’s director appears to make it plain that they were not interested or open to offers. However, a Government Impact Assessment of the disposal proposal for the Public Forest Estate, which amongst other factors, considered the different possible methods of disposal (for the whole PFE) states,

*“Members of Wildlife and Countryside Link have expressed an interest in 10,000 ha under a Sponsored Transfer arrangement”.*

The paper goes on to note under ‘Disadvantages’ re: NGO Sponsored Transfer, *“NGOs currently unwilling without compensation from government to cover costs of staff and the provision of public goods – therefore, there may be no net saving to the exchequer of this transfer.”<sup>xii</sup>*

This appears to indicate that Government met with Wildlife Link members or the body collectively, ahead of the public announcement of the disposal proposal, and came away with the impression that some members of Wildlife Link were indeed interested in taking on c. 10,000 hectares, assuming that financial incentives were provided.

#### **Questions that remain unanswered:**

- Was the RSPB at any point – or any of the NGOs open to offers?
- Was the RSPB one of the member groups making up Wildlife Link that had *‘expressed an interest in 10,000 ha under a Sponsored Transfer arrangement’?*
- Did the RSPB (or any of the other NGOs) withhold or moderate its concerns over the Government’s disposal proposals because it or other NGOs were in discussions or considering taking on parts of that indicated 10,000 has?

**Our Forests** asks that the RSPB – and the other NGOs – provide clear, unequivocal answers to the above. If they cannot – then the extremely concerning conclusion that might reasonably be reached would be that the NGOs were willing at some point in the process to allow the Government proposal to dispose of all 258,000 hectares of the public woods and forests to proceed on the basis that just 10,000 hectares were secured under the outlined ‘Sponsored Transfer agreement’.

### **3. National Trust response received 31<sup>st</sup> August, 2011 - from Dame Fiona Reynolds, CBE, director-general:**

*“Thanks for your email and request for information about discussions between the National Trust and the Government, including the Forestry Commission, about the proposed sale of England’s forests. The National Trust was as surprised as anyone when the Government published its consultation document, not least because the Government had not talked to us about it beforehand.*

*After its publication I spoke to Caroline Spelman and Oliver Letwin to voice our concerns about the proposals. In radio interviews and privately to Ministers I expressed shock at the content of the consultation paper. As your press release captures, the National Trust also said very clearly that we would consider what part we might play should the Government insist on pursuing the proposals. That, and no more, was reflected in my conversations with them.*

*The Forestry Commission has for some time had an annual programme of disposals. In October 2010 our then Land Use Director, David Riddle, met the Forestry Commission to discuss a limited number of sites which the National Trust might be interested in should they be included in that programme.*

*We also met with the Forestry Commission twice in February this year, after the consultation was launched, to gain a better understanding of what the Government was proposing and to discuss the management and other implications. The purpose of this was to inform our response to the consultation - not whether the Trust might take on Forestry Commission sites.*

*You also asked about management costs. The National Trust has just over 400 woodland sites across England, Wales and Northern Ireland, about 25,500 hectares in all. Most of these woods are an integral part of larger traditional estates including farmland and parkland or, in the uplands, rough grazing. The woodlands are used for a variety of purposes, depending on the needs of the individual property and its visitors.*

*We have six forestry advisers who give specialist advice to our property managers. Some properties have direct labour teams, but most harvesting work is done under contract. We also have numerous wardens and rangers who carry out tree and woodland work. We manage our woodlands as part of larger properties, rather than as a separate forestry estate, with very few staff dedicated to forestry work alone. So unfortunately we don't have separate cost or income figures for our woodland, or for woodland restoration work. We would, though, expect that these would vary considerably from site to site."*

#### **Our Forests' analysis and comments:**

The National Trust states that it had had no prior discussions with Government relating to the consultation document outlining the disposal proposals and options. That consultation document and the proposals to dispose of the woods and forests that make up the public forest estate were launched on 27<sup>th</sup> January 2011.

<http://www.defra.gov.uk/news/2011/01/27/englands-forests/>

The National Trust expressed 'shock' but did not unequivocally state its opposition to the proposals – indeed as Fiona Reynolds acknowledges the Trust publicly stated it was considering, "*what part we might play should the Government insist on pursuing the proposals.*" It is not expanded upon what form that 'part' was envisaged as taking.

*"The National Trust was as surprised as anyone when the Government published its consultation document, not least because the Government had not talked to us about it beforehand."* That seems to be an unequivocal statement of the Trust's position, but contradicts what the Secretary of State, Caroline Spelman said in response to questions on the matter from MPs during her appearance before the Environment, Food & Rural Affairs Committee on Wednesday, 30<sup>th</sup> March 2011. As reported in the press: ***'Spelman also made a curious assertion – answering a question as to whether she had sought the opinions of "stakeholders" such as the National Trust ahead of pursuing the sell-off, she said firmly that she had, and that she spoke to all "stakeholders" constantly. This is very strange – Fiona Reynolds, director general of the National Trust, categorically denies that Spelman ever spoke to her about the policy before it was announced. She found out about the policy through the media.'*** <sup>xiii</sup>

Fiona Reynolds also acknowledges that the Trust met with the Forestry Commission, but only, "to inform our response to the consultation - not whether the Trust might take on Forestry Commission sites." That also does appear to contradict some reports in the press:

**Daily Telegraph, 23<sup>rd</sup> October 2010**

*'A spokesman for the National Trust said: "Potentially this is an opportunity. It would depend on which 50 per cent of land they sold off, if it is valuable in terms of nature, conservation and landscape, or of high commercial value in terms of logging. We will take a fairly pragmatic approach and look at each sale on a case by case basis, making sure the land goes to the appropriate organisations for the right sites, making sure the public can continue to enjoy the land." <sup>xiv</sup>*

**The Guardian, 28th January, 2011**

*'The National Trust is poised to offer to take over or buy much of the state-owned English woodland which the government is planning to sell off. The initiative, says the trust's director, Dame Fiona Reynolds, could protect in perpetuity not just large areas of "heritage" areas such as the Forest of Dean and the New Forest, but other woodland expected to be offered for sale to communities and commercial enterprises in the biggest change in land ownership for more than 80 years. "This is a watershed moment in the history of the nation. These much-cherished places have been in public hands for centuries, enjoyed by everyone for generation after generation. The future of these important national assets will be decided in a matter of weeks," Reynolds told the Guardian. "For 116 years, the National Trust has helped to save the places the people of this country most value when their existence, or access to them, has been threatened. If the government is determined to pursue the course of action it has outlined and the public wish us to, we are ready to play our part in giving them a secure future. We are ready to step in." <sup>xv</sup>*

The first article appearing before the consultation was made public by Defra on 27<sup>th</sup> January, 2011, the second just after its launch.

**4. The Wildlife Trust's response - 31<sup>st</sup> August 2011 from Stephanie Hilborne, Chief Executive**

*"I am responding to your email asking questions about The Wildlife Trust perspective on the debate around the Public Forest Estate (PFE). Our response to your request is as follows:*

**The Wildlife Trusts (TWT)**

*TWT consists of forty seven independent charities (thirty seven in England) governed and owned locally but linked through their membership of the Royal Society of Wildlife Trusts.*

*TWT share a vision of A Living Landscape, a recovery plan for nature which involves enlarging, improving, creating and joining up wildlife-rich areas of land to create a connected ecological network across the UK. To fulfil this vision, we are working secure the best use and management of all land, including forests and woodlands, for the benefit of people and wildlife. We achieve this through advice and partnership, as well as through managing land directly. In considering the role of the PFE, the importance of*

*woodlands and forests for wildlife and for people is therefore our starting point, and a key part of our agenda for nature's recovery and restoration.*

### **TWT's approach to considering forests**

*We believe decisions about wooded land need to be taken as a part of a coherent strategy for the country's natural environment. Our forests are an important element of what needs to become a resilient ecological network across England. This is true whether forests are in public, private or voluntary sector ownership. Land in public ownership offers the Government a key opportunity to demonstrate its commitment to securing nature's recovery - as sought in the 2010 Lawton Review.*

*There is great potential for the PFE to contribute to the large-scale habitat restoration sought in the Natural Environment White Paper. Currently an estimated 60,000 hectares of the PFE in England consists of habitats such as ancient woodlands or heathlands that have been damaged by inappropriate coniferous plantations. We believe that these habitats need to be restored sensitively to improve their value to wildlife. Wildlife Trusts throughout England are working in close partnership with the FC to restore such habitats as well as to develop the value of other woodlands for people and wildlife.*

### **TWT and the FC**

*TWT have good working relations with the Forestry Commission throughout England and recognise that good practice on nature conservation has become more prevalent. We note however that this approach to nature conservation is not, as yet, fully enshrined in the FC's statutory purpose. The FC retains the same primary purpose that it had when its practices were very damaging to wildlife. This situation needs to be remedied by bringing its remit into line with its current best practice. The FC also needs to be more proactive in restoring open habitats, where plantation forest has in the past been established on high wildlife value sites such as heathland and in ancient woodland, through securing appropriate policies and finances.*

*As you will be aware, previous Governments have also sold FC land and Trusts have worked extremely hard to ensure that such sales did not lead to wildlife damage. TWT has, and continues, to work in partnership with FC across the country to secure improved management of sites and on occasion Trusts have raised funds to purchase the land themselves if they felt that these areas would otherwise be at risk.*

### **TWT's support to local communities**

*Each Wildlife Trust is part of its local community and we have a strong track record of supporting local people working to protect and manage important wildlife-rich sites. Part of this is the long history of local communities campaigning to protect woodlands from loss and damage and today there are large numbers of 'Friends' groups working with TWT, local authorities and others in the management and promotion of woodlands as valued community assets. TWT can demonstrate how to secure local community ownership of sites together with the right outcomes for conservation and access.*

### **Question 1**

*"Have you or any of your staff met or otherwise communicated with any representatives of this Government or their officials (including Forestry Commission staff) at any point over the past 15 months to discuss your organisation taking on - under whatever arrangements - any parts of the current Forestry Commission Public Forest Estate? If*



so, please specify the date when you met, what was discussed and any agreed outcomes.”

*It is normal for TWT to meet with officials and Ministers in Defra, and with FC officials (including during this period) to discuss a full range of topics from marine conservation and badgers through to forestry. When it became clear the Government was considering land disposals we added this to our agendas for meetings.*

*Our guiding principle for this engagement is expressed well by the Lawton Review report 'Making Space for Nature' recommendation: 'Public bodies owning land which includes components of England's current or future ecological network should do more to realise its potential, in line with their biodiversity duty. Further, before disposal of any public land, the impact on the ecological network should be fully evaluated. Where such land is identified as having high wildlife value (existing or potential) it should not be disposed of unless its wildlife value is secured for the future.'*

*In this context we believe that voluntary agencies can manage land very effectively for wildlife and people in the right circumstances. It is one way of us achieving our core charitable objectives.*

*The key points we have been making on the future of the PFE have been as follows:*

- Woodlands and forestry should not be treated in isolation from other forms of land use and management – they all contribute to an ecological network.*
- Prior to any disposals there should be a full assessment of the current and potential ecological value of the land in question.*
- Any decisions on disposals need to fully consider local practicalities and costs of land management in the future.*
- No quick decisions should be made – we expressed concern at the potential extent and speed of the proposals and urged the Government to find time for proper consideration.*
- Land of substantial nature conservation value (including its potential contribution to an ecological network) should be retained within public management for as long as possible to allow sufficient dialogue with third sector organisations.*
- Any decisions need to understand the locality and work through devolved decision-making.*

*Once we were aware that the Government might dispose of the PFE we quickly identified FC sites that we consider to be particularly important for achieving A Living Landscape and communicated this to Defra. We obviously wanted to be sure that any disposals would result in sympathetic management, and that opportunities for restoration would not be missed.*

## **Question 2**

*“Please can you also provide the average management costs per hectare for any woods, forests - including other habitats being restored from former or presently planted up woodland (i.e. restoration of plantation ancient woodland sites, heathland etc.)- that lie within your organisation's land holding.”*

*Wildlife Trusts currently manage 16,300ha of woodland in England under a principle of open public access to these woods – indeed we have active community management through volunteer management committees and events. I am afraid that we cannot*

*answer this question as we have no centralised system for recording such information, nor do Trusts systematically record volunteer hours and in-kind support from local businesses as separate items in their accounts. The other complicating factor is that we do not divide the costs of management of areas of wooded land in our land-holdings from areas of non-wooded land. I am sorry not to be more helpful here.”*

#### **Our Forests analysis and comments:**

- **Habitat restoration:**

As noted elsewhere, the Forestry Commission’s record on managing key wildlife habitats is second to none – with 99% of all Sites of Special Scientific Interest on the PFE being in top ‘favourable’ condition. A better record than for any other land-manager, including the Wildlife Trusts. As also stated above all ancient woodland areas that have been previously planted up with non-native species (Plantation Ancient Woodland Sites) are in the process of being restored.

- **Nature conservation not fully enshrined in the FC’s statutory purpose:**

The Forestry Commission’s statutory duties and powers as summarised in the Forestry Act are *‘promoting the interests of forestry, the development of afforestation and the production and supply of timber and other forest products’*. These mainly relate to incentives and regulation, controls on felling, plant health and managing the public forest estate. However, there is also a legal duty to seek ‘a reasonable balance’ between the production and supply of timber and the interests of conservation.

Under Section 28G of the Wildlife and Countryside Act 1981, (as amended by the Countryside and Rights of Way Act 2000), the Forestry Commission and their leaseholders have an obligation to maintain, protect and enhance Sites of Special Scientific Interest (SSSI) and Special Areas of Conservation (SAC). These amended duties requiring the Forestry Commission to take account of environmental issues have been commended by Wildlife & Countryside Link of which, the Wildlife Trusts is a member:

***“The Forestry Commission’s Broadleaves’ Review in 1985 and amendments to the Wildlife and Countryside Act 1985 that gave the Forestry Commission a new duty to take account of environmental issues, marked a turning point in post-war forestry policy. There was no longer an overwhelming emphasis on timber production through afforestation with exotic conifers as the main purpose for forestry in the UK.”***

Wildlife & Countryside Link - Making the Link 30 years review <sup>xvi</sup>

Notwithstanding the above, updating the Forestry Commission’s statutory duties so that environmental issues and nature conservation are ‘fully enshrined’ legally in the Commission’s approach and activities is a sound suggestion which Our Forests supports.

- **Management costs:**

*“I am afraid that we cannot answer this question as we have no centralised system for recording such information, nor do Trusts systematically record volunteer hours and in-kind support from local businesses as separate items in their accounts. The other complicating factor is that we do not divide the costs of management of areas of wooded land in our land-holdings from areas of non-wooded land “*

A straight answer, but not very reassuring given that the various conservation bodies receive millions of £s in public grants sourced from the taxpayer annually: £28.7m in grants was received by private and charity woodland owners in 2010.<sup>xvii</sup>

Without the detailed management data as the Forestry Commission is required to provide, how can the public, know that The Wildlife Trusts and other NGOs in receipt of public grants are delivering 'Value For Money?'

A crude calculation of average management costs per hectare across all non- FC woods based on total grants made divided by certified woodland (only UKWAS/FSC certified woodland is eligible for woodland grants) gives a figure of c. £108.00 per hectare.<sup>xviii</sup> FC costs per hectare averaged out across the whole Public Forest Estate are £56 per hectare.<sup>xix</sup>

- **Questions that remain unanswered:**

*"When it became clear the Government was considering land disposals we added this to our agendas for meetings".* What is not clear whether or not The Wildlife Trusts discussed taking on some PFE land or not?

The later paragraph quoted below suggests they might have done:

*"Once we were aware that the Government might dispose of the PFE we quickly identified FC sites that we consider to be particularly important for achieving A Living Landscape and communicated this to Defra. We obviously wanted to be sure that any disposals would result in sympathetic management, and that opportunities for restoration would not be missed."*

## **Appendices**

### **1. Our Forests submission, 29/7/11**

**To Whom It May Concern - This is a request made under the Freedom of Information Act.**

Please can you provide details of all meetings and/or discussions in person, via the phone or email that the Government and its officials (including Forestry Commission staff) have held with any organisations - including conservation NGOs and/or commercial and professional bodies - concerning any of those organisations and bodies potentially taking on land currently falling within the Forestry Commission public forest estate?

Please also provide details of all meetings and/or discussions in person, via the phone or email that the Government and its officials (including Forestry Commission staff) have held with any overseas based organisations - including conservation NGOs and/or commercial and professional bodies - concerning any of those organisations and bodies potentially taking on land currently falling within the Forestry Commission public forest estate?

Please specify the dates of any such meetings above and all those attending. Please also supply copies of notes you hold of any such meetings and discussions in the form of paper and electronic records, including emails.

Please supply the average costs per hectare for managing the woodlands and forests that lie within the public forest estate in England and which are managed by the Forestry Commission.

Please specify the overall costs per annum to the taxpayer for managing the woods and forests of the public forest estate in England.

As well as the average costs across the entire 258,000 hectares of the public forest estate, please also supply management costs per hectare for the following indicative examples of woods and forests on the public forest estate:

- a site with minimal access, low visitor numbers, and a primary output of timber production;
- a site delivering an average mix of multi-purpose forestry benefits i.e. access/timber/biodiversity/ecosystem services;
- a site developed/restored as community woodland in close proximity to urban populations.

We look forward to hearing from you promptly (within 20 working days, as specified under the Freedom of Information Act) and providing the information requested.

## **2. Comparative woodland management costs**

The Forestry Commission manages over 1,500 woods, forests and other land covering 258,000 hectares at an overall final cost to the public via central government funding of £14 -15 million per annum (2009 figures – cut to £10 million for 2010/11), which spread across the whole estate averages out at c. £56 per hectare. Costs vary considerably for different woodland sites depending on range of outputs – and are at least three times higher for woodland in or close to urban areas than rural woodland. Figures for some of the sites in the South East, catering for high visitor numbers stand at c. £77 per hectare. Overall management costs for some newly restored urban community woodland sites have been estimated at reaching over £500 per hectare. In comparison, the Woodland Trust (WT) owns/manages over 1,000 woods – totalling c. 23,100 hectares in England. In 2009, WT received £1.2 million in grants via the Forestry Commission in 2009 and £1.0m in 2010 (England Woodland Grant Scheme) and with other public grants received a total of c. £2 million. Those figures would appear to put their woodland management costs in the average range of c. £95 - 120 per hectare. WT's sites generally compromise small woods with a basic level access (car park and some paths), but rarely rangers on-site. But as their Chief Executive notes, costs for urban sites can be much higher up to £1,000 per hectare.

Sources:

<http://www.forestry.gov.uk/england-estatestudy>

Woodland Trust Annual Accounts 2009/2010

<http://www.woodlandtrust.org.uk/en/about-us/publications/key-publications/annual-review/Documents/annual-review-2010.pdf>

We believe the above figures are representative - but are pleased to publish corrections as available

---

## References

<sup>i</sup> See press statement, 29/7/11 in Appendices below.

ii

[http://www.ico.gov.uk/upload/documents/library/environmental\\_info\\_reg/practical\\_application/eir\\_time\\_for\\_compliance\\_faqs.pdf](http://www.ico.gov.uk/upload/documents/library/environmental_info_reg/practical_application/eir_time_for_compliance_faqs.pdf)

iii

[http://www.ico.gov.uk/for\\_organisations/environmental\\_information/information\\_request/responding.aspx](http://www.ico.gov.uk/for_organisations/environmental_information/information_request/responding.aspx)

<sup>iv</sup> Email sent to Our Forests by Forestry Commission: 2 August 2011 10:39:34 GMT+01:00  
Subject: RE: Freedom of Information Request - Ref: OF290711

<sup>v</sup> CPRE, Friends of the Earth, Women's Institute are signed up as supporters of the Campaign for Freedom of Information. There is no record of the National Trust, RSPB, Wildlife Trust or the Woodland Trust having done so.

<sup>vi</sup> <http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm110202/debtext/110202-0001.htm>

<sup>vii</sup> [http://saveourwoods.co.uk/wp-content/uploads/2011/07/Our-Forests-Ancient-Woodland-briefing\\_21\\_July.pdf](http://saveourwoods.co.uk/wp-content/uploads/2011/07/Our-Forests-Ancient-Woodland-briefing_21_July.pdf)

<sup>viii</sup> <http://archive.defra.gov.uk/corporate/consult/forests/20110127-forestry-eqia.pdf>

<sup>ix</sup> [http://www.forestry.gov.uk/pdf/eng-pfe-econmicresearch-final.pdf/\\$FILE/eng-pfe-econmicresearch-final.pdf](http://www.forestry.gov.uk/pdf/eng-pfe-econmicresearch-final.pdf/$FILE/eng-pfe-econmicresearch-final.pdf)

<sup>x</sup> <http://www.forestry.gov.uk/england-estatestudy>

<sup>xi</sup> Woodland Trust Annual Accounts 2009/2010  
<http://www.woodlandtrust.org.uk/en/about-us/publications/key-publications/annual-review/Documents/annual-review-2010.pdf>

<sup>xii</sup> Impact Assessment (IA), Options for disposal of the Public Forest Estate,  
<http://archive.defra.gov.uk/corporate/consult/forests/20110127-forestry-ia.pdf>

<sup>xiii</sup> <http://www.guardian.co.uk/environment/blog/2011/mar/31/caroline-selman-committee-forests-flooding>

<sup>xiv</sup> <http://www.telegraph.co.uk/earth/countryside/8082756/Ministers-plan-huge-sell-off-of-Britains-forests.html>

<sup>xv</sup> <http://www.guardian.co.uk/environment/2011/jan/28/national-trust-save-english-woodlands>

<sup>xvi</sup> [http://www.wcl.org.uk/docs/2010/Making\\_the\\_Link\\_2010\\_14Jul10.pdf](http://www.wcl.org.uk/docs/2010/Making_the_Link_2010_14Jul10.pdf)

<sup>xvii</sup> Forestry Statistics 2011  
<http://www.forestry.gov.uk/website/forstats2011.nsf/LUContents/B7068EF6D5B8F11380257363004D353D>

<sup>xviii</sup> Total woodland in England = c.1.3m hectares; 1.0m = non-FC PFE. < 30% of that = UKWAS/FSC certified = 265,000 hectares. £28.7m was paid out in 2010 for planting, restocking & planning woodland, £28.7m divided by 265,000has = £108 per hectare.

xix

See Appendix 2