

## Woodland creation in Wales: context, principles and recommendations

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Native woodlands, have, since the last Ice Age, been the natural climax vegetation<sup>1</sup> of much of the UK. This continuity provides for particularly high ecological and biodiversity value. If sustainably managed, Wales' woodland and trees also offer huge benefits in terms of public access and recreation, public health, landscape quality, and ecosystem services such as flood mitigation, soil and carbon management, air quality and cooling our towns and cities<sup>2</sup>. Wales is globally significant for Atlantic Oak Woodland – particularly our Celtic rainforests<sup>3</sup>.

For people, native woodlands provide places to explore and connect with nature and a sense of well-being. By managing woodlands sustainably, we are nurturing a habitat for both wildlife and people. Sustainably managed commercial forests supply important timber and wood products and, if managed appropriately, can also deliver biodiversity value.<sup>4</sup> This diversity of objectives and benefits is recognised in the Welsh Government's Woodland Strategy.

Despite the multifunctional benefits that appropriately managed<sup>5</sup> woodland and forestry can deliver, only 15% of Wales is covered by woodland and forestry<sup>6</sup>, much lower the average for European countries of 37%<sup>7</sup>. Welsh forests are predominantly coniferous, encouraged by historic UK Government incentives for commercial planting by public bodies and private landowners.<sup>8</sup> Native woodlands have been lost, reduced in size, become increasingly fragmented and are under threat from pollution (such as ammonia<sup>9</sup>), commercial forestry encroachment, tree diseases and invasive species, and development.

### Policy Context

Since 2009, the Welsh Government has set itself a goal of significantly increasing woodland cover in Wales. Woodland creation, and better management of existing woodland, are important elements in the Welsh Government's plan to mitigate the impacts of climate change and reduce greenhouse gas (GHG) emissions in Wales by 80% from 1990 levels by 2050<sup>10</sup>, in accordance with the Paris Climate

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<sup>1</sup> Vegetation that would exist in an area if growth had proceeded undisturbed for an extended period.

<sup>2</sup> Air temperature regulation by urban trees and green infrastructure

[https://www.forestry.gov.uk/pdf/FCRN012.pdf/\\$FILE/FCRN012.pdf](https://www.forestry.gov.uk/pdf/FCRN012.pdf/$FILE/FCRN012.pdf)

<sup>3</sup> <https://celticrainforests.wales/information>

<sup>4</sup> The composition of the woodland and the way that it is managed will determine its value for wildlife. It is possible to replicate important wildlife features in commercial forestry, such as gap size, gap creation rate and the amount of open space, which can suit the silvicultural systems of rotational clear-cutting and coppice.

<sup>5</sup> UKWAS certification clearly defines appropriate management.

<sup>6</sup> Research Briefing Woodlands in Wales: a quick guide. National Assembly for Wales Research Service 2017

<http://www.assembly.wales/research%20documents/17-008-woodlands/17-008-web-english.pdf>

<sup>7</sup> FAO. 2015. Global Forest Resources Assessment 2015. Rome.

<sup>8</sup> Forest Ecology and Management (2018) *Reviewing the evidence base for the effects of woodland expansion on biodiversity and ecosystem services in the United Kingdom*

<sup>9</sup> <https://www.woodlandtrust.org.uk/media/1687/ammonia-impacts-on-ancient-woodland.pdf>

<sup>10</sup> CCERA, The Welsh Government's progress on climate change mitigation: Annual Report of the Climate Change, Environment and Rural Affairs Committee accessed from <http://www.assembly.wales/laid%20documents/cr-ld11567/cr-ld11567-e.pdf>

Agreement. The Welsh Government, along with the other governments of the UK, has declared a climate emergency and accepted the updated advice from the UK Committee on Climate Change (UK CCC) that a new target is needed to reduce greenhouse gas emissions by at least 95% by 2050, compared with 1990 levels<sup>11</sup>.

As part of achieving this target, (along with other habitats options) Wales needs to apply the recommendation from the UK CCC that Wales' forest cover is increased by 6%. This implies increasing forest cover in Wales from just under 15% at present to about 21% by 2050, an increase of about 125,000 ha (approximately 4166 ha per year)<sup>12</sup>.

The Welsh Government's 2018 Woodlands for Wales Strategy sets a short-term target of creating 2000 ha of new woodland each year between 2020 and 2030 and beyond<sup>13</sup>. The Assembly's Climate Change, Environment and Rural Affairs Committee stated in their 2018 report on climate change mitigation progress that more ambition and innovation is required given that current rates of woodland creation fall far short of recommendations.

As part of the aspiration for woodland creation, the Welsh Government also needs to succeed in meeting Wales' biodiversity commitments, including the Well-being of Future Generations Act goals and Environment (Wales) Act 2016 duties. WEL believes the primary goal for woodland creation policy is to deliver resilient, sustainably managed woodland ecosystems that underpin Wales' achievement of climate change and biodiversity targets. Our members support the principles of the [Charter for Trees, Woods and People](#) in relation to woodland creation (which includes the principle of "the right tree in the right place") and believe this should be delivered through creating new native woodland and promoting sustainably managed and biodiverse commercial forestry.

The right standard of certification is important and the United Kingdom Forestry Standard (UKFS) sets out sustainable forest management guidelines, and provides a reference standard for the forestry sector. UKFS guidelines are open to interpretation and do not equate to either a legal requirement or good forestry practice requirement. The UK Woodland Assurance Scheme (UKWAS) is an independent certification standard that can be used for assessing compliance with UKFS as part of an environmental management system such as ISO 14001. It also supports the conservation of ancient and semi-natural woodland and encourages ancient woodland restoration in its guidelines on biodiversity.

WEL recognises the value of ensuring the availability of domestically grown timber, produced to high sustainability standards. We acknowledge the very high dependence of the UK on timber imports and support new woodland for timber production that meets the principles outlined in this paper, and is managed in accordance with UKWAS. This is the only forestry standard that provides detailed criteria and an independently audited process that ensures sustainable forest management practices are met. The Welsh Government, in its Woodlands for Wales Indicators, reports that only a fifth (20%)

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<sup>11</sup> The UK Committee on Climate Change (2019) - Net Zero – The UK's contribution to stopping global warming

<sup>12</sup> The UK Committee on Climate Change (2020) - Land use: Policies for a Net Zero UK <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

<sup>13</sup> Welsh Government. (2018). Woodlands for Wales: The Welsh Governments Strategy for Woodlands and Trees. p11 Accessed from: [https://beta.gov.wales/sites/default/files/publications/2018-06/woodlands-for-wales-strategy\\_0.pdf](https://beta.gov.wales/sites/default/files/publications/2018-06/woodlands-for-wales-strategy_0.pdf)

of woodland outside of the public forest estate is known to be managed to the UKFS (as certified by UKWAS)<sup>14</sup>.

### **Balancing biodiversity and landscape impacts of increasing tree cover**

It is critically important to recognise that simply planting more trees does not automatically guarantee positive outcomes for biodiversity, carbon or water resource management. New woodland planting can have negative impacts upon all of these outcomes if location and design is poor, for example, if the location for tree planting is currently of high nature conservation value, or is suitable for restoration, such as peatland, wetland habitat or wildflower meadow.

Poorly located and managed woodland and forestry can negatively impact open habitats and species directly if replacing existing important habitat or covering areas utilised by species, such as wading birds, for nesting or feeding. Indirect impacts include:

- provision of habitat for predatory species such as foxes and crows, which are provided with cover from which to hunt vulnerable species such as curlew;
- if impacts on adjacent land are not considered at the planning stage, there is potential for expansion of inappropriate species on designated sites, such as the coniferous self-seeding on peatland from neighbouring plantation forestry at the Berwyn SSSI<sup>15</sup>; and
- acidification, pesticide use and degradation of soil quality, affecting adjacent habitats and freshwater ecosystems.

Where such species management programs are a priority this may require the creation of tree planting exclusion zones. These should be clearly evidenced and mapped, and incorporated into regional plans, such as Area Statements. Control or exclusion of certain species may also be necessary in some circumstances, both to protect new woodland (e.g. from deer or grey squirrel) or to prevent unacceptable impacts on adjacent land.

Enhancing the landscape through appropriate location and internal design of new woodlands is also an important consideration in getting the balance right. This is important everywhere but especially so in and on the margins of designated landscapes – notably the National Parks and AONBs in Wales.

### **Design requirements for diverse and sustainable new forests**

For new woodland to have the best chance of providing biodiversity, access and landscape benefits, it must be designed and managed correctly as well as located correctly. Current official guidance in the UKFS<sup>16</sup> needs to be interpreted in a way that fully meets the requirements of Welsh legislation and policy: in particular, the duty on public authorities under the Environment (Wales) Act to maintain and enhance biodiversity and promote the resilience of ecosystems, and the requirement under the WFG Act of fully applying sustainable development principles through the 5 ways of working. For example, the UKFS states that 75% of planting in an area can be allocated to a single species. We question how this can be consistent with the requirements for resilience, for long term and preventative ways of working, and the statement on page 11 of the Woodlands for Wales

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<sup>14</sup> Welsh Government (2019) Woodlands for Wales Indicators 2017-18. Statistics for Wales 103pp. <https://gov.wales/woodlands-wales-indicators-april-2017-march-2018>

<sup>15</sup> NRW (2015): Restoring moorland in the Berwyn Mountain range <https://naturalresources.wales/about-us/news-and-events/news/restoring-moorland-in-the-berwyn-mountain-range/?lang=en>

<sup>16</sup> Forestry Commission (2017) The UK Forestry Standard: the government's approach to sustainable forestry. 4th Edition 232pp [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/687147/The\\_UK\\_Forestry\\_Standard.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687147/The_UK_Forestry_Standard.pdf)

Strategy that “Priority is given to creating both new native and new mixed woodlands that can deliver multiple benefits, and to use of planting and natural processes to do so”. We are aware that, in practice, this is usually no more than 60% in recently created commercial plantations. We suggest that UKFS guidance should drive good practice rather than trailing behind actual practice.

UKFS contains statements that, for example, advocate consultation on sensitive and significant proposals, the conservation and restoration of priority habitats, and improving ecological connectivity, but the wording is often tentative and open to interpretation. This suggests that such guidance is optional despite clear expectations established under Welsh legislation. Similar language is often used in relation to UKFS guidance on design for access and landscape sensitivity. This ambiguity in wording, and the absence of auditing of the actual application of UKFS, means that the Standard may give the impression of setting high requirements for forest sustainability, but it does not guarantee this.

The Environmental Impact Assessment (EIA) requirements for new afforestation are essential and effective requirements that could ensure new woodland creation is well conceived and designed. These must continue to be enforced effectively by NRW and treated as part of the essential design and management planning for new woodland. NRW should also provide early stage guidance on planting design considerations and ensure these are integrated into grant scheme requirements.

### **Requirements for Woodland Creation**

WEL calls for the Welsh Government’s updated Action Plan for woodland creation<sup>17</sup> to adopt the following targets and approach to woodland creation.

#### **Targets**

There are two main policy drivers for woodland creation targets:

1. Greenhouse gas emission mitigation targets driven by the Paris Agreement and Wales’ recent commitment to reduce greenhouse gas emissions by 95% by 2050.
2. The need to create new habitat with the aim of increasing biodiversity and improving ecosystem resilience.

Targets associated with biodiversity are more complex and relate to woodland design and management as well as overall tree cover in different types of environments. The majority of woodland creation should consist of locally appropriate native species. Commercial forestry planting should be designed to ensure we avoid the mistakes of the past, with a diverse range of species to limit pest and disease impacts. Native woodland elements and open space must be strategically designed to contribute to wider biodiversity goals e.g. improving connectivity and forming resilient ecological networks.<sup>18</sup>

The Welsh Government should set an over-arching target of more than 140,000 ha new native woodland by 2050, which would necessitate woodland creation of approximately 5000 ha/yr. This target represents what would be necessary for greenhouse gas emission reduction and a fair

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<sup>17</sup> Welsh Government. (2015). Woodland for Wales Action Plan: The Welsh Government’s Strategy for Woodlands and Trees. Accessed from: <https://beta.gov.wales/sites/default/files/publications/2018-03/woodlands-for-wales-action-plan.pdf>

<sup>18</sup> We suggest that woodland should be future proofed for resilience to tree diseases by considering alternative species to replace oak and ash, such as beech, sycamore, and alder, and also planting of understory shrubs, which could support a range of wildlife, including at-risk species.

contribution toward the UK tree planting target. We would see this being delivered as an appropriate mix of native and commercial woodland, agro-forestry, hedge planting and urban tree planting. Much of this could also be delivered using natural regeneration rather than planting, and be achievable without resulting in the degradation of other important wildlife habitats.

To achieve this, existing woodland habitats must also be improved, better connected, and better protected, and enough resources must be made available for woodland managers to effectively manage, monitor and enhance the stock under their responsibility. Areas of important habitat such as wood pasture and ffridd should be recognised and both protected and restored.

We recognise that some key woodland creation issues are being addressed via the low carbon plan, such as the recognition of the damage caused by planting on peat. However, WEL believes the following key actions could be real game changers for increasing woodland cover in Wales in such a way that it contributes positively to climate change targets, biodiversity and landscape enhancement and opportunities for recreational access.

### **WEL's recommendations for increasing woodland and tree cover in Wales**

1. Welsh Government should pursue a new National Forest for Wales, taking lessons from the National Forest and the proposed Northern Forest projects in England, which aim to cover large areas covering multiple counties and towns and also include areas of important open habitat and amenity woodlands alongside smaller sections of diverse, commercial forestry.
2. Area Statements to be used as a key tool for identifying woodland creation opportunities and signalling where on the ground scoping and advice would be beneficial.
3. More resources for woodland and conservation advisers within NRW to give more proactive on the ground support and guidance in the early stages of woodland creation proposal development, even in instances where planting proposals are not part of a grant application or do not require an EIA. This is essential to ensure appropriate decisions are made for each site, and planting does not take place to the detriment of priority species or other ecosystems services.
4. Early engagement with local stakeholders (particularly rural and farming communities) is resourced and required to ensure support for proposals in terms of local benefits such as biodiversity, access, amenity and landscape character as well as carbon sequestration benefits.
5. Invest in tree nursery capacity in Wales and commit to use of UK Sourced and Grown (UKSG) planting stock to minimise the risk of importing tree disease. Any non-UK sourced stock to adhere to strict procurement and biosecurity processes and standards.
6. The new Sustainable Land Management scheme to include whole farm assessments for small scale planting and natural regeneration, to prioritise connecting and buffering existing woodland and creating new accessible woodland as well as the potential for small-scale diverse plantations where appropriate. The assessments should also identify where planting and/or natural regeneration creates other benefits such as flood alleviation.
7. Expand trees outside woods, in addition to new woodland creation. This would include hedge regeneration, agroforestry, riparian corridors, urban trees and plans for replacing ash trees lost to dieback. WEL estimates that agroforestry measures could deliver at least a third of the annual tree planting target.

8. Local authorities to use i-tree assessments or similar and develop, as part of green infrastructure plans, strategies to include at least 20% urban tree cover and woodland management, ensuring priority is given to native tree species.
9. Any commercial woodland that receives public money, or is in a Welsh Government supply chain, should be obligated to adhere to UKWAS standards and deliver a contribution to enhancing biodiversity and resilient ecosystems. Any planting for carbon sequestration should also be registered with the woodland carbon code, which has an independent validation process.
10. Welsh Government should invest in research and monitoring to aid full understanding of the ecological and ecosystem service opportunities and costs of woodland expansion in Wales, and to ensure monitoring takes place to identify whether the biodiversity and carbon benefits (along with other benefits such as flood alleviation) are being achieved.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is a respected intermediary body connecting the government and the environmental NGO sector in Wales. Our vision is a healthy, sustainably managed environment and countryside with safeguarded heritage in which the people of Wales and future generations can prosper.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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