

**Cynulliad Cenedlaethol Cymru | National Assembly for Wales**  
**Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate Change, Environment and Rural Affairs Committee**  
**Ymchwiliad i ddyfodol Polisiâu Amaethyddol a Datblygu Gwledig yng Nghymru | Inquiry into the Future of Agricultural and Rural Development Policies in Wales**  
**AAB 22**  
**Ymateb gan Coed Cadw**  
**Evidence from Woodland Trust**

**What are the fundamental outcomes we want to see from agricultural, land management and rural development policies?**

**1. The need for Change**

- a. The loss of CAP, as a consequence of Britain leaving the EU, provides an opportunity to rethink and improve our environmental future. This offers real scope for a genuinely collaborative approach to building a new suite of environmental and land use policies.
- b. The need to do this has never been greater. Climate change, resource depletion and intensification are driving unsustainable pressures on, soil, water resources and biodiversity. Our responses need to be on a scale capable of significantly aiding adaptation to these accelerating and transforming changes in land use and habitats.
- c. There must be a willingness to re-examine and modify some of the established attitudes in the farming, forestry and nature conservation sectors and identify areas of common long term interest.

**2. Life is better with trees**

- a. The ground-breaking Well-being of Future Generations Act outlined seven well-being goals that seek to describe a common vision for the Wales we want. The opportunity to shape and implement new agriculture, land management and rural development policies represents the best opportunity in a generation to achieve these very outcomes, and woodland and trees can play a huge role in doing this.
- b. At the right scale and in the right places, trees and woods are increasingly being recognised as a means to deliver key social and environmental benefits. The recently published [State of Natural Resources Report](#) (SoNaRR) underlines the role of woods and trees in delivering most of the well-being goals highlighted in the Welfare of Future Generations Act<sup>1</sup>:

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<sup>1</sup> On the 9<sup>th</sup> page of the [Summary](#), though the pages are not numbered.

- i. A resilient Wales – trees and woods can play a crucial role protecting ecosystems and sustaining wildlife and reducing flood risk.
- ii. A prosperous Wales – trees and woods contribute substantially not just in terms of the timber and firewood they yield, but also in enhancing resilience and productivity on farms and provide the attractive landscapes and opportunities for tourism and recreation.
- iii. A healthier Wales – trees and woods do not just provide opportunities for healthy exercise, but also literally clean the air by removing harmful pollutants; shields against noise and can help limit flooding.
- iv. An equal Wales – tree planting in areas where most people in Wales live helps build community action; could ensure that everyone was able to enjoy a more pleasant, leafier environment that aids regeneration.
- v. A Wales of cohesive communities – involving communities in tree planting and the management of their local woodlands has been shown to improve community cohesion and reduce anti-social behaviour
- vi. A Wales of vibrant culture and thriving Welsh language – landscapes including ffridd, coedcae, hedgerows and ancient trees and woodland have played a significant role in the development of distinct cultural practices and locally specific art and literature.
- vii. A globally responsible Wales – The Welsh Government’s ambitious of creating 100,000 ha of new woodland was first conceived as a means of reducing net CO2 emissions from the land-use sector, as well creating a more resilient landscape.

### **3. How can this vision be delivered?**

- a. For many years, it has proved difficult to promote the idea of an integrated approach to land use that balances development with productivity and nature conservation - and do so in a way that meets the needs of today’s society without depleting the natural systems that underpin our long-term welfare. With 84% of land in Wales under agriculture, one of the biggest barriers to such an approach has been the monolithic Common Agriculture Policy (CAP). The removal of CAP as a consequence of Britain leaving the EU, provides an opportunity to rethink and improve our environmental futures. This offers real scope for a genuinely collaborative approach to building a new suite of environmental and land use policies. The need to do this has never been greater. Climate change, resource depletion and intensification are driving substantial new pressures on soil, water resources and biodiversity. Our responses need to be on a scale capable of significantly aiding adaptation to these accelerating and transforming changes in land use and habitats.
- b. The social, environmental and economic benefits of trees and woods are increasingly recognised and valued in a wide range of circumstances. However, trees and woods should not be dealt with in isolation but recognised as an essential component of resilient, productive and cherished landscapes. Despite the growing evidence base for the wide ranging benefits of trees and woods, the rate of new woodland creation has fallen steadily.

- c. Future public support should be targeted to secure a wide range of defined environmental outcomes that are of benefit to us all, broadly, those outlined in statute in the Well-being of Future Generations Act. There should be support for landowners who recognise and maintain wildlife habitat on their farms and valuable environmental features wherever they occur. However, there should also be recognition that direct support is not the only method of achieving desired outcomes. We want to see the Welsh Government develop a new sustainable land management policy for Wales and an incentive framework that is locally designed and delivered, outcome focused and secures benefits for people, the environment and nature as well as an economic future for land managers.
- d. We support the principles for such a scheme set out in the statement issued by Wales Environment Link. Key headline asks for future land management support in Wales: 7<sup>th</sup> November 2016. This notes that: “Pillar 1 payments are unsustainable. In the context of Welsh legislation, public money should only be made available for delivery of public benefits. There should be an end of support to farming and forestry actions that externalise costs and compromise Wales’ ability to deliver sustainable management of natural resources and invest in restoration of ecological resilience to deliver the greatest public benefit.”
- e. To this general statement we would add that:
  - i. Incentive structures such as grant and agri-environment schemes should be reviewed and compared with other approaches such as an annual subsidy payment for the provision and maintenance of habitats on farms; and large scale habitat restoration programmes for example including peat land restoration and creation of new woodland.
  - ii. Any new system must positively encourage and support land-managers in a substantive multi-purpose expansion of woodland, planting the right trees in the right places, while avoiding perverse incentives to remove trees which provide positive benefits.
  - iii. In some landscapes we think there is a role for managed but low cost approaches based on the operation of natural ecological process, including native woodland colonisation and the acceptance of wild browsers such as deer. Such landscapes would be neither “abandoned” nor “unproductive” but deliver substantial and crucial benefits for water resource management, flood mitigation, tourism and biodiversity in a very cost effective way.
  - iv. There needs to be coordination with the negotiating stance of the UK Government on Brexit and the need for delivery mechanisms that are consistent at UK and international level, such as carbon funding, UK tax incentives and international trade regulations.

- v. Overall, this would signal a welcome move away from the overly-complex and at times seemingly irrational CAP, leaving behind the unintended consequences and perverse incentives that it currently inflicts on our natural environment.

#### 4. What lessons can we learn from current and previous policies? What about policies elsewhere?

- a. While the European Union has had competency in agriculture and been able to set rules of governance in farming, competency in forestry and woodland has remained a member state issue. This has led to an artificial separation of land uses and in turn formed a barrier to a more integrated approach which could deliver multiple benefits. This has led to confusion, contradictions and complications on the ground, which have reduced the ability to deliver a sustainable land policy.
- b. An example of what was wrong with the CAP was the implementation of the Basic Payment rules which required every farmer in Wales to accurately map clusters of trees over 100m<sup>2</sup>, and subtract this from the eligible land area. Not only did this require a huge amount of work from farmers and civil servants, but it also had the effect of punishing farmers for having trees on their land, despite Welsh Government policies which support land managers to plant more trees.
- c. Integrated into farming systems trees contribute by the provision of: shade, shelter, water and pollution management, soil protection (preventing erosion), soil sustainability through support of microorganisms and addition of valuable nutrient, pollination, integrated pest management and product diversification<sup>2</sup>. At the same time they help to improve the biodiversity and connectivity of the natural landscape, and in some situations they provide additional ecosystem services by way of heritage and tourism<sup>3</sup>.
- d. The work carried out at Pontbren provides one example of how trees should be an integral part of an innovative, leading and sustainable food and farming sector.<sup>4</sup> Despite this it remains extremely difficult to emulate the Pontbren approach under CAP constraints.
- e. The need to maintain land in “good agricultural condition (GEAC)” has resulted in a perverse incentive to remove trees and fostered a belief that trees are a barrier to productivity, despite evidence to the contrary. The use of agri-environment schemes (AES) to compensate for these problems has suffered from the separate

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<sup>2</sup> Woodland Trust, 2012. Planting trees to protect water – the role of woods and trees on farms  
<https://www.woodlandtrust.org.uk/publications/2012/08/planting-trees-to-protect-water/>

<sup>3</sup> Woodland Trust, 2015. The economic value of woodland – placing a value on woodland.  
<https://www.woodlandtrust.org.uk/publications/2015/03/the-economic-benefits-of-woodland/>

<sup>4</sup> The Pontbren project - a farmer led approach to sustainable land management in the uplands published by the Woodland Trust available online here: <http://www.woodlandtrust.org.uk/publications/2013/02/the-pontbren-project/>

and complex administration of agricultural and forestry schemes, over-complicated rules and targeting and inadequate field advisory expertise. Habitats that fall between the two definitions have traditionally fared worse, especially the iconic Welsh wood pasture landscapes of ffridd and coedcae. The current approach also acts as a disincentive to the development and expansion of new and more resilient land use techniques based on agro forestry, and multi species continuous cover forestry that could better deliver multi-purpose outputs.

- f. There is a need to look at more whole-farm/whole-field approaches to incentives and support as well as targeting interventions to deliver landscape wide benefits arising from improving habitat connectivity and achieving significant impact across whole river catchments.
- g. Analysis of the impacts of Agri-Environmental Schemes (AES) has shown mixed results<sup>5</sup>, with better delivery achieved through more targeted, rather than entry level schemes<sup>6,7</sup> and targeted advice and support<sup>8</sup> to deliver effective outcomes. There is definitely a role for future AES but consideration will need to be given to the design and targeting of any new schemes to ensure that best use of previous experience is achieved, that impacts are significant and cost effective, and genuine public benefits are delivered.
- h. Although AES started as locally based and locally administered schemes informed by field advisory support they are now centrally managed and controlled. This has resulted in a blandness of scheme, standard options and a tendency towards a 'one size fits all' approach that ignores site level complexity and the regional ecological, social and cultural differences which AES should recognise and champion. This has been exacerbated by an over-reliance on desk based assessments using inevitably incomplete and out of date GIS datasets. Good land management decisions cannot be made remotely and must involve professional interaction with landowners.
- i. The need to audit schemes effectively, with limited on the ground personnel, has resulted in a prescriptive approach to scheme design using, for example, numbers of livestock or dates of action as substitute measure of success rather than the delivery of the biodiversity or environmental *outcomes* the scheme was designed to achieve.
- j. The reliance on a prescriptive approach fails to take into account geographical, seasonal or climatic variations both generally and between years. There is also a

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<sup>5</sup>Kleijn, D. and Sutherland, W.J. (2003) How effective are European agri-environment schemes in conserving and promoting biodiversity? *Journal of Applied Ecology* 40 (6), pp 947 - 969

<sup>6</sup> Carvell, C., Meek, W.R., Pywell, R.F., Goulson, D. and Novakowski, M. (2007) Comparing the efficacy of agri-environment schemes to enhance bumble bee abundance and diversity on arable field margins. *Journal of Applied Ecology* 44 (1), pp 29 - 40

<sup>7</sup> Donald, P.F. and Evans, A. D. (2006) Habitat connectivity and matrix restoration: the wider implications of agri-environment schemes. *Journal of Applied Ecology* 43(2), pp 209 - 218

<sup>8</sup> Wading upstream (2001) RSPB

resulting minimisation of the role of the land owner and manager, who can be excused for failing to understand the aims of the scheme whilst being more focussed on the 'rules'. Fear of loss of income or fines on the part of individual applicants, and concern over possible large scale disallowance by the regulators, often results in compliance with poorly framed scheme rules even if they are counterproductive.

- k. An outcome based approach, which uses the skills of the land manager to achieve agreed aims, is more complex to administer and will require greater involvement of on the ground advisers, but has the potential to deliver significantly improved environmental benefits.

**5. To what extent should Wales develop its own agricultural, land management and rural development polices or should it be part of a broader UK-wide policy and financial framework?**

- a. The Welsh Government must take a full part in both the determination of any future UK agriculture position and in the succeeding negotiations. We strongly believe that this agricultural position should only be a top level statement that identifies the fundamentals, for instance a commitment to environmental conditions. We want to see the Welsh Government develop a new "made in Wales" sustainable land management policy and an incentive framework that is locally designed and delivered, outcome focused and secures benefits for people, the environment and nature as well as an economic future for land managers and that is coordinated with this overall UK framework. All decisions on how to design and deliver agricultural support should remain with the Welsh Government, with full engagement with landowners and a wide range of other stakeholders.
- b. The new policy framework must be aligned with the Well-being of Future Generations Act and the Environment Act and secure benefits to people, the environment and the economy in an integrated way.
- c. Specific elements of any future sustainable rural land management policy should be devolved down. The future areas under the Environment Act for which Area Statements will need to be written would appear to be an ideal level for regional and river catchment level land management schemes and delivery resourcing.