

Confor response to the Northumberland National Park Draft Plan

Confor: Promoting forestry and wood (www.confor.org.uk) is a not-for-profit membership organisation which represents 1500 sustainable forestry and wood-using businesses across the UK. Confor represents the whole forestry and wood supply chain and focuses on strategic issues vital to the success and sustainable future of the sector.

Confor is happy for this response to be published.

Introduction

This draft plan misses a huge opportunity for developing the future environmental, social and economic potential of the Park as an asset for the nation, by ignoring the potential of productive forestry.

Productive forestry could make a major contribution to almost every challenge identified in the consultation, yet the only comment the Draft has to make on them is that, 'whilst providing habitat for some species and an important refuge for England's remaining native red squirrel population, their overall landscape and biodiversity impact is considered negative compared to native habitats.'

This response highlights the ways in which forestry can deliver on green infrastructure; jobs and economy; connectivity; new housing; renewable energy and fuel poverty; carbon reduction; landscape tranquillity and dark skies; cultural heritage; wildlife; climate resilience; and tourism.

Case Study: Doddington Moor

Just outside the boundary of NNP, just north of Wooler, the largest new forest in England for a generation is being planted. The forest at Doddington North Moor will cover 268 hectares of a 354 hectare site, with 660,000 trees including Sitka spruce, Oak, Birch, Scots pine, Western red cedar, Noble fir, Aspen and Alder.

As part of the project, a rare peat mire on the site was restored, and the Red squirrel buffer zone extended.

The site will create new mountain bike trails, improved access to a bouldering site, and opportunities for forest education.

The first trees were planted by local primary school children, who were told by Forest Manager Andy Howard, 'For the rest of your lives, you will be able to see these trees growing. As you grow up, the trees will grow with you.'¹

¹ <http://www.confor.org.uk/news/latest-news/planting-starts-at-largest-forest-in-england-for-a-generation/>

Green infrastructure

The Draft states that 'development proposals should include measures that will enhance green infrastructure provision and create opportunities for wildlife in the National Park commensurate with the scale of the proposal and intensity of activity expected.'

Green infrastructure and opportunities for wildlife are intrinsic to a forestry development, maximised by the provisions in the UK Forestry Standard. The majority of timber from the UK's productive forests carry independent sustainability certification, and promoting these within the Park will ensure that the entire area of the forest is audited to an internationally-recognised standard endorsed by WWF, RSPB, and the National Trust.²

In the Draft's words, 'proposals will be encouraged where a range of green infrastructure benefits can be achieved.' The benefits are listed as:

- a) protect and enhance existing natural and historic environments;
- b) strengthen connectivity and resilience of ecological networks;
- c) be locally distinctive through reflecting and enhancing landscape character;
- d) maximise opportunities to mitigate and adapt to climate change; or
- e) improve quality of life through provision of benefits for health and wellbeing, including opportunities to access open space and enjoyment of the National Park and its special qualities.

Given that productive forestry can deliver on all these benefits on a large scale, and on a strong economic basis, a strategy to promote productive forestry should be a core component of the Plan.

The 2014 *Roots to Prosperity* report proposed the creation of 215km² new forest across the 39,500km² of the North of England.³ Allocating the share of this to the 1,049km² of NNP would require planting 5,700 hectares, 0.5% of the area of the park, or two 'Doddington's' every year for 10 years.

The sections below explore in more detail how incorporating this vision for forestry into the strategy would deliver on a huge range of identified priorities.

Jobs and economy

The Draft notes that, while farming and forestry are the biggest employers in the park, these are in decline, and overall employment has declined by 37% between 2006 and 2016 in contrast to national growth. The Draft adds that 'the agriculture and forestry sectors are not forecast to expand over the plan period'.

The Draft ignores the advice of its own recent *Economic Futures and Employment Demand Study*, which reported, 'The economic benefits which forestry can bring to a local economy can be immediate in terms of employment and local expenditure as a result. [...] Agriculture is becoming increasingly extensive and sparse with areas of

² <http://ukwas.org.uk/>

³ <http://rootstoprosperity.org/>

land unmanaged as a result. Selective commercial plantings may be of benefit to both these sparse areas and to the communities within.⁴

The *Roots to Prosperity* report estimates that 1,000 jobs could be created in Northern England by adopting its proposals.

The defeatist tone of the Draft is a failure of responsibility to the NNP and its community.

Connectivity

The report notes that poor road and digital connectivity are key challenges for the economy.

Forestry provides a strong economic case for infrastructure upgrades, and a powerful business lobby to source funding.

Well-designed forestry is also vital in an area where landscape qualities are so vital, as it is able to conceal roads and communications masts which would blight an open landscape.

New Housing

The report notes a 'clear need for family housing, elderly accommodation and housing for working-age residents'. It also notes the need to upgrade much of the housing stock in the park. However, it misses the opportunity to develop a vision of how these homes could make a positive contribution to the park, focusing only on avoiding negative impacts.

For environmentally-friendly construction, wood is the only realistic option as other materials like brick, block and steel all have very high carbon and pollution impacts. The UK is the second biggest importer of timber in the world, second only to China. The *Economic Futures and Employment Demand Study* notes that locally, too, 'there is an increasing demand for timber products with demand outstripping supply in the NPP.'⁵

UK-grown conifers are suitable for timber frame homes and ideal for versatile and modern green building materials such as cross-laminated timber, glulam and particleboard. These also lend themselves to low-impact offsite timber construction techniques.

A better vision for housing in NNP would be that within 30 years, NNP-grown timber houses were being manufactured locally in the North of England and brought back as carbon-negative, energy-efficient homes.

⁴ [Economic Futures and Employment Demand Study](#) (Northumberland National Park Authority, May 2018) p.31.

⁵ [Economic Futures and Employment Demand Study](#) (Northumberland National Park Authority, May 2018) p.31.

Energy and fuel poverty

The report notes that 'there are no properties within the National Park that are connected to the national gas grid [...] Housing stock is older, frequently under-occupied and inefficient in energy use.' It also notes that 'The National Park is a working landscape'. However, it provides little in the way of solutions to the problems of fuel poverty and heavy reliance on fossil fuels to heat rural properties, focusing rather on avoiding visual impacts of renewable energy installations.

Again, an opportunity has been missed to develop a vision for NNP to develop a low-impact, carbon-negative, and forward-looking energy policy.

The National Energy Foundation estimates that one hectare of woodland will produce enough wood to heat a home every year.⁶

Creating 5,700ha productive forest in the Park under the UK Forestry Standard would include the creation of a minimum of 285ha of native broadleaf woodland. This must be managed for biodiversity, which can be combined with the production of wood fuel.

This suggests that even if all the conifer crop is made into higher-value timber products, these forests could produce enough fuel to take 285 households, almost a third of the houses in the park, off fossil fuel. Bringing existing native woodlands into better management is likely to be able to supply much of the remainder.

This firewood can be certified as sustainably and locally produced through the Woodsure Assurance Scheme⁷. Being locally grown it will have none of the biosecurity or sustainability issues associated with imported firewood.

Taking only the 'annual increment' (the amount of wood that grows each year) from a forest promotes faster and healthier growth and keeps its carbon store equal. A woodfuel strategy could eliminate the need for highly-polluting oil, LPG and coal in the park, at the same time as bringing native woodlands into better management and reducing home energy costs.

Carbon reduction

The Draft notes the obligation of NNP to participate in national carbon reduction, but then fails to provide any clear vision or targets, saying only that it can 'only contribute very modestly' to renewable energy but that its 'main contribution' will be through 'its carbon sinks – forests, woodlands, and huge areas of peatland.'

As the section above on renewable energy demonstrates, NNP could develop a woodfuel strategy that would make its home energy sector almost carbon neutral.

⁶ <http://www.nef.org.uk/knowledge-hub/wood-fuel-equipment/wood-fuel-frequently-asked-questions>

⁷ <https://woodsures.co.uk/#>

Productive conifer woodland sequesters carbon even more effectively, as harvested wood used in timber products such as houses locks up carbon for many decades, while fast-growing new trees grow in their place. The Committee on Climate Change calculates this extra benefit as 'Harvested Wood Products'. A study by Confor calculated that one hectare of productive forest under the UK Forestry Standard provides carbon benefit of 7.3 tonnes of CO₂ per hectare per year – slightly more than the UK per capita emissions of 7.1 tonnes.

The creation of 5,700 hectares of productive forest in an area with only 2,000 residents would make NNP an important carbon sink. Since livestock farming is a significant emitter of carbon, NNP could encourage farmers to plant a proportion of their land with enough productive timber to turn their farms from carbon sources into carbon sinks, potentially sourcing financial assistance from the Woodland Carbon Fund.⁸

Landscape, Tranquillity and Dark Skies

The Draft emphasises the importance of these special qualities of NNP, noting that 'Northumberland National Park remains the most tranquil place in England.'

It is difficult to see how an expansion in the park's forests could not assist in protecting and enhancing these, particularly in the context of a desire to develop tourism and farm diversification.

Infrastructure such as roads, homes, farm buildings, communications masts, holiday parks, car parks, visitor centres, trails, and activities such as concerts and sporting events, can be sited in forests with almost no visual disruption, noise pollution, or light pollution to the wider area.

Where the development is designed first, and some trees planted to 'screen' the activity, the effect is usually artificial and only partly successful. The trees will be merely income lost to the developer, who will spend as little as possible on their maintenance.

However, where a forest is designed first, with locations identified within it for future development, it will be professionally maintained for its own economic value, and will have the scale required to deliver the required environmental benefits.

The Plan should identify areas where forestry and other economic development can be concentrated together, ensuring the development of the park's economy and accessibility without detriment to its special qualities or protected open areas.

Cultural Heritage

The Plan notes that 'the quality of the cultural heritage and historic environment are part of what attracts people to visit the National Park, and is therefore an important part of the local economy. However, these resources are also fragile, vulnerable to insensitive change, and, ultimately, irreplaceable.' It urges that 'development

⁸ <https://www.gov.uk/guidance/woodland-carbon-fund>

proposals should [...] ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved or enhanced.'

The UK Forestry Standard lays down strict requirements for the preservation and enhancement of the historic environment.

For the kinds of heritage listed in the plan, 'earthworks, ruins, finds, historic buildings, historic landscapes, industrial archaeology, military sites, and boundaries', a surrounding forest is one of the best ways to preserve it from disturbance from extreme weather, grazing animals, erosion or development.

A forest can also be the means to turn a neglected site into a tourist destination: parking, paths and interpretation can be incorporated into (and hidden sensitively within) the design of the forest, and the visit to the site is enhanced by the 'adventure' factor of being in a forest, for example creating a sense of remoteness and timelessness in a clearing deep in the woods, or a surprise view from a hilltop whose lower slopes are wooded.

The Plan should consider how the significant private investment available for forestry could be strategically channelled to preserve and enhance the Park's heritage. This will also make the links between the Park's working landscapes of the past, present, and future.

Wildlife

Although Red squirrel (which inhabits conifer forests) and ancient woodland are highlighted as a key species and habitat, there is a failure in the Draft of strategic thinking as to how these are to be protected and enhanced.

The Draft's principle that 'development resulting in the loss or deterioration of irreplaceable ancient woodland [...] will not be permitted unless the need for and the benefits of the development are wholly exceptional and clearly outweigh the loss of biodiversity' seems like a recipe for the slow attrition of the remaining, fragmented ancient woodland.

As with many of the other challenges, the money and skills brought by private forestry investment can provide a large-scale and long-term strategy to enhance the Park's forest wildlife.

The Doddington example above demonstrates how new productive forests can contribute to Red squirrel conservation.

As with historic sites, the protection of ancient woodland by new woodland is one of the best ways to secure its long-term future. A modern forestry design could work with local conservation groups to ensure that the area around an ancient woodland was enhanced by native planting, for example using local seed or encouraging natural regeneration through the elimination of grazing animals. Beyond this, the conifer crop would provide a managed buffer for the ancient woodland, providing it with a clear economic value which protects it from other development, and restoring it to a substantial woodland ecosystem rather than an unsustainable, degrading fragment. As with historic sites, there are greater opportunities to incorporate the ancient woodland

into forest walks, with parking, paths and interpretation hidden within the conifers without damaging the ancient woodland.

The Plan should clearly connect a strategy for productive forestry to the principle that 'opportunities will be promoted for habitat management, restoration, expansion that strengthens the resilience of the ecological network, and enables habitats and species to adapt to climate change or to mitigate the effects of climate change.'

Climate resilience

The Plan should connect a forestry strategy to the principle that 'planning decisions should [...] improve the resilience of new and existing development to extreme weather event risks such as flooding, wild-fires and the effects of climate change.'

The careful design and active management that characterises all modern productive forests ensures that they can make important contributions to reducing flooding and wildfires, especially in areas where agriculture is in decline and there is a risk of land abandonment.

Tourism

The Draft sees tourism as the biggest hope for NNP's future economy, but also sees much tourist development as a threat to the park. It notes that 'successive visitor surveys confirm that it is the scenery, open spaces, opportunities for walking and tranquillity that are the main reasons why people visit the National Park. These special qualities, however, need to be supported by infrastructure such as car parking, footpaths, trails, access areas, toilets, shops, cafes, pubs, and interpretive material.'

It has been noted above that forests provide a second important strand in economic development, reducing the risk of building an economy entirely reliant on tourism. It has also been noted that large productive forests can 'soak up' the majority of the infrastructure associated with tourism, minimising any negative impacts of development.

It is interesting to note that the Authority expresses a prejudice against 'static caravans' for tourist accommodation but lists 'sustainable self-catering [...] of sympathetic design' including 'wooden cabins, camping pods [and] shepherds huts.' One might note first that even static caravans may be hidden completely within a forest, but also that the main difference between these and the preferred forms of accommodation is that the latter are built from softwood.

It would be ironic if the Park encouraged 'sustainable accommodation' built from imported softwood from an international forest resource under increasing pressure from growing global demand, while refusing to allow the creation of sustainable forests which could supply this timber and showcase the potential of the UK's national parks to produce truly local and sustainable holiday infrastructure.

The Draft also notes that this new accommodation must be 'well-screened [...] to the extent that development will not cause adverse impact to landscape character.' As noted above, this will be far more successful if the development is hidden within a

wider forested landscape, rather than artificially 'screened' by a few grudgingly-planted and poorly-maintained trees.

Conclusion

Forests are the world's richest ecosystem and timber is most valuable material for the twenty-first century bioeconomy.

Northumberland National Park is renowned for its open landscapes and cultural heritage, but it also recognises the urgent need to develop jobs, housing, tourism and infrastructure while also enhancing land management, creating more diverse wildlife habitats, addressing fuel poverty, sequestering carbon and enhancing climate resilience.

Forestry, uniquely, is able to contribute to every one of these priorities at once. With the development of forest certification, the UK Forestry Standard, and the professionalisation of the forestry sector, poorly-designed 'conifer blocks' are a thing of the distant past.

The Northumberland National Park Authority owes it to residents, visitors and future generations to put a vision for the creation of forests to provide sustainable, locally grown timber at the heart of its plan.

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