

**National Assembly for Wales**  
**Environment and Sustainability Committee**  
**PFE 3**  
**Inquiry into The Public Forest Estate in Wales**  
**Response from: Ian Miller**

**Attention: National Assembly for Wales (NAW) Environment & Sustainability Committee**

Re.: NRW's management of Wales' public forest estate

This submission concerns NRW's management of Newborough Forest within the Abermenai & Aberffraw dune SAC, Anglesey/Ynys Môn.

1) In 2009-2010 Forestry Commission Wales produced a Forest Management Plan for Newborough Forest. Solely at the insistence of CCW and in the face of intense public opposition this FMP included plans to permanently remove areas of the forest; specifically areas that link the forest to the beach, those most valued by the public. CCW's ultimate minimum demand was that a 500m swathe of forest be removed around all coastal forest boundaries disconnecting the forest from the beach and setting it half a kilometre back from the foredune ridge. The FMP clearfelling plan roughly meets that target through a combination of clearfelling combined with what we could accurately call 'malign' management. The public suspended opposition on receiving firm assurances in the FMP that impartial and independent arbitration would resolve the disputed CCW claims that purported to support the rationale for permanent removal of sections of forest. It should be emphasized that the 2010-2015 FMP for Newborough Forest reiterates this firm commitment in a number of places. NRW have reneged on this commitment to the public and proceeded with phase 1 of their clearfelling plan disingenuously calling it a 'trial'.

2) No credible scientific and/or conservation argument or Habitats Directive requirement has ever been provided to justify NRW's permanent removal of forest areas. The failure to substantiate CCW/NRW claims before an impartial and independent arbitration panel highlights NRW's contempt for the public but also the lack of sound science, conservation or Habitats Directive requirement that would support the clearfelling action.

3) In proceeding with clearfelling NRW pre-empt arbitration and create a *fait accompli*, a cynical and wholly unjustified action.

4) On purely forest management terms NRW's clearfelling action is something no competent forester would have contemplated without careful pre-planning and underplanting to create a robust new forest boundary. The removal of 'shelter belt' salt & wind tolerant trees along the Cefni estuary has now exposed trees hitherto sheltered from the worst of the prevailing wind and salt spray. NRW's clearfelling will guarantee that newly exposed less wind and salt tolerant forest will suffer considerable damage especially in wind conditions such as those during last winter. NRW are fully aware of the consequences of their actions and the clearfelling will result in significant wind throw and salt related dieback; forest destruction 'by stealth' in other words. We can accurately describe this as malign management.

5) The Welsh Government's Woodlands for Wales policy has a number of key themes; two of these in particular are relevant to Newborough Forest: 'woodlands for people' and the

contribution woodlands can make in response to climate change. A key aesthetic asset at Newborough is the intimate link between the forest and the beach, an asset much appreciated by the public. The forest provides shelter in our often inclement weather making Newborough an all weather venue allowing the public to appreciate the coast and seascapes in all weather conditions. The Woodland for Wales strategy recognizes the health benefits, both physical and psychological, provided by woodlands. This woodland is especially appreciated because it not only offers woodland but one that provides a coast and shoreline setting offering considerable health and recreational benefits to the many visitors both local and otherwise. NRW's current and future clearfelling is destroying this asset and is doing so on the most exposed forest boundary where shelter is especially needed by the public.

6) Considering the contribution woodlands can make in responding to climate change NRW appear to have completely ignored the C costs and as far as we are aware made no attempt to produce a long term C budget for their permanent forest removal plan. The initial clearfelling may be relatively small but this euphemistically labelled 'trial' is actually 'phase 1' of more significant forest removal. NRW have not accounted for: permanent loss of C uptake capacity, considerable emissions related to the clearfelling operation itself and transport of material off site and since the timber is low grade will ultimately result in C emissions probably through burning. Defra estimate typical conifer woodland contains about 60tC/ha of above ground biomass and that 85% of that would ultimately end in the atmosphere following clearfelling. Recent research has also highlighted the very important role conifer aerosols play in cloud formation and their significant positive effect in countering climate change. Forestry research has also highlighted how clearfelled conifer woodland soils become significant sources of C emissions. NRW are engaged in an unjustified, C costly landscape engineering exercise that will ultimately destroy significant areas of Newborough Forest, a forest held in trust for future generations by the Welsh Government.

7) On a more general forestry management note the 2010-2015 FMP committed itself to improving forest diversity and working towards the development of a Natura 2000 forest habitat type, Atlantic dune woodland. The creation of this habitat type in the UK was part of the original UK BAP targets. It is characterized by two conifer species, Scots pine [*Pinus sylvestris*] and the maritime or cluster pine [*Pinus pinaster*], and a diverse range of deciduous trees. NRW's recent continuous cover forest management activity has involved thinning and re-planting with large numbers of North American cedar and birch. Any chance of meeting the FMP plan to work towards the creation of Atlantic dune woodland at Newborough has now been lost.

8) Economic considerations:

In this time of austerity for NRW to squander significant public funds on a landscape engineering 'trial' that was never needed and has never been justified is an appalling misuse and waste of public funds. When there is such pressure on public finances to cope with needed and useful work for NRW to embark on such unnecessary expenditure requires explanation.

9) In Sept. 2013 NRW held a public meeting at Newborough at which they announced they were renegeing on their 2010-2015 FMP commitment to impartial & independent arbitration and were proceeding with their plans for permanent removal of sections of forest. They stated that the effects of the so-called 'trial' would be carefully monitored and they undertook to make this process public. To date there is no information in the public domain so any pre-felling impact

assessment remains unavailable to the public nor any information about what will be monitored, by whom, for how long, what methods/protocols will be employed and what public scrutiny will be offered. The area clearfelled and planned for felling is an area where there are red squirrels, various bird species, sand lizards, dune orchids that shelter within the woodland margin and a wide range of insects and other flora. NRW's forest removal plans seem to have paid scant regard for the wellbeing of this diverse range of flora and fauna.

#### Summary:

NRW have proceeded with the first phase of their plans to permanently remove sections of Newborough Forest, specifically those sections that link the woodland to the beach. In doing so they have failed to follow the commitment made in their own 2010-2015 Forest Management Plan (FMP); to have impartial and independent arbitration determine whether the claims they made to support their forest removal plans were credible and justified the action. The commitment was that no permanent removal of forest could take place until impartial and independent arbitration had resolved NRW's disputed claims.

They have failed to take into account the impact their plans have on a number of areas of Welsh Government Woodlands for Wales policy; in particular woodlands for people and the role woodlands play in combating climate change. No account has been made of C budget impacts, impact on flora and fauna inhabiting the clearfelled woodland areas and if any pre-felling assessments and post-felling monitoring of the clearfelled areas has been carried out or is planned there is no information in the public domain.

In a time of considerable austerity the use of significant public funds on a project that NRW have failed to justify on scientific, conservation or Habitat Directive grounds requires some explaining. This needless landscape engineering project does nothing to contribute to the conservation and protection of the existing dune habitats of the SAC, those that the Habitat Directive actually requires the agency to conserve and protect. In fact the agency in work associated with the clear-felling 'trial' have destroyed sections of protected mobile dune habitat along the Cefni estuary; NRW have driven cuttings through the foredune ridge adjacent to the clearfelled area. In doing so they have destroyed both the physical structure and characteristic plant community of grade 'A' mobile dune habitat that the SAC was set up to protect. NRW appear to have a rather unique view of the concept of habitat protection and their obligations under the requirements of the Habitats Directive.

Dr Ian Miller

[Newborough CCW Science Review - independent scientist]

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