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# NEWBOROUGH FOREST PROTECTION GROUP

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24<sup>th</sup> February 2011

Dear Sir

I am contacting you on behalf of the more than 15,000 members of the public who have signed our petition in 2004 and 2009/2010 to ensure that you are aware of the widespread public opposition that exists towards the Countryside Council for Wales' recommendations for Newborough Forest. You should also be aware that the numbers registering their opposition could have been considerably higher because virtually everyone approached was very concerned and wanted to sign our petition. We suspended our major campaigning to allow the Science Review to take place in a less volatile atmosphere. The CCW effectively ignore public opinion & have an objective to clear-fell significant areas of the forest that would destroy the link between forest and shore and cause unnecessary destruction in order to expand the sand dunes. To achieve their aims the CCW have misled the Forestry Commission Wales suggesting but not substantiating claims that felling is necessary in order to fulfil requirements of the Habitats Directive. For the public's views & more information visit:-

(<http://www.savenewboroughforest.org.uk/WhatPeopleThink> )

PEOPLE FEEL THAT NEWBOROUGH FOREST SHOULD BE GIVEN 'SPECIAL' PROTECTION, & THAT ACTION IS URGENTLY REQUIRED TO ENSURE THAT THE FOREST IS PROTECTED IN ITS ENTIRETY FOR FUTURE GENERATIONS TO ENJOY.

Newborough forest is an extremely popular tourist attraction. It is the only large open access woodland (700 hectares) on Anglesey/Ynys Môn. It is the island's best outdoor leisure centre enjoyed by families, walkers, horse riders, cyclists, and people just out for a stroll in the fresh air. This woodland is a very important amenity with a diverse range of visitors (over 200,000 annually). People visit all year round to take advantage of the shelter it provides: shade in the summer and most importantly allowing access in our often inclement weather providing shelter from rain and freezing winter winds. It is very important for the island's tourism which accounts for over £100m of the island economy.

The forest was planted from 1947-65 to stabilise the dunes which have historically proven to pose a threat to Newborough village and the surrounding farm land. It has developed into a much valued & beautiful dune woodland with a rich under-storey of native trees, vegetation & associated wildlife. There is also a very important raven population and the forest provides a refuge for the protected native red squirrel.

The forest is owned by the Welsh Assembly Government and held in trust for 'the people of Wales'. Forestry Commission Wales (FCW) manages Newborough Forest on behalf of the Welsh Assembly Government and the Countryside Council for Wales (CCW) act as conservation advisers to the Forestry Commission.

Newborough forest is part of a Special Area of Conservation (SAC) that was designated in 2004. There is a very large dune area to the east known as Newborough Warren and mobile dune habitats around the forest/beach boundary. Starting in 2004 & again in 2009 the CCW have claimed, but failed to substantiate, that the forest is having an adverse impact on the dune area. In 2009 CCW stated that the WAG was in danger of infraction proceeding by the EU. This turned out to be nonsense and the EU DG Environment had no concerns that might have led to legal action. The forest & dunes have in fact co-existed in harmony for over 60 years and evidence of harm to the dune system appears to be in short supply.

CCW have advised FCW that to comply with the Habitats Directive forest areas that provide an intimate link between the forest and beach need to be removed. These are the very areas that provide unique aesthetic value and make this site of special attraction to visitors. CCW claim that it is necessary to: (1) clearfell forest and in doing so landscape the site to create dune zonation behind the beach & (2) to address the unsubstantiated impacts of the forest on the hydrology of the dune habitats of the Warren.

*(1) The Directive provides no remit for conservation agencies to 'turn back the clock' to some former era and a UK/EU workshop in 2002 made it clear that the Directive requirement is to protect and conserve **the habitats present at the time the Directive came into force; in particular the area and range of those habitats.** This is a so-called 'conservation status baseline'. The two day workshop participants included all the UK conservation agencies including CCW, devolved government representatives, JNCC, Defra, the EU Directorate responsible for the Habitats Directive [DG Environment] and Danish government representatives, holders of the EU Presidency for that 6 month period.*

*CCW's objectives ignore both the actual requirements of the legislation and the key asset that this part of the forest represents. These areas of the forests allow the visitor to appreciate our wild coastal heritage in all weather providing shelter from wind and rain, allowing access in our often poor weather conditions and provide shade in the summer. In addition these trees form a very important shelter-belt for the rest of the forest while other sections of CCW's felling plans will threaten access roads & car parks with inundation by sand.*

*(2) Since 2004 the CCW have claimed, but failed to substantiate, that the forest is having an adverse impact on the Warren dune groundwater. They say that another popular part of the forest may need to be removed to restore the groundwater to dune slacks. However it should be remembered that the forest has been a significant presence for over fifty years and hydrological impact on the slacks should have manifest itself long since. The lack of any significant impact on the dune slacks over this fifty year period needs to be explained.*

*Another consideration is that if this type of unsubstantiated claim is accepted repeated felling & moving the dune boundary to a new forest edge would in time remove most of the forest. Very recently the 10 metre buffer zone which previously existed along the dune/forest boundary has been removed. The dune boundary is now under the trees.*

*For a detailed analysis see:- ( [http://www.savenewboroughforest.org.uk/Assessment review.pdf](http://www.savenewboroughforest.org.uk/Assessment%20review.pdf) )*

In response to protests to the Welsh Assembly Government by the general public, the CCW have been carrying out a review of the science behind their own recommendations. This has resulted in no significant change in their position, & as agreed, this matter is now being referred to an independent arbitration panel which will consider the disputed issues.

The FCW have very recently produced a 5 year Forest Design Plan which shows that there could be substantial clear-felling within the disputed areas within the next 5 years, depending on the outcome of the scientific review. Further substantial felling is also possible at the end of this period.

Whatever the outcome of the science review the Habitats Directive makes clear that any measures must also take into account the 'economic, social and cultural requirements and regional and local characteristics' when planning conservation measures. It has been clear from the outset that CCW have never meaningfully considered either the economic value or the ecosystem services and contribution to biodiversity that the forest provides. It seems that the important services provided by the forest and the wishes of visitors & the interests of the Anglesey tourism industry are being ignored.

The benefits and assets provided by the forest encompass the concepts of the EU & UN policy to understand and appreciate the economic value of our ecosystems and natural environment. I'm referring to the EU policy: the Economics of Ecosystems and Biodiversity [TEEB] project:

<http://www.teebweb.org/Home/tabid/924/Default.aspx>

<http://bankofnaturalcapital.com/>

<http://ec.europa.eu/environment/nature/biodiversity/economics/>

CCW's narrow approach to its conservation role highlights a failure to understand the wider considerations that must be incorporated into conservation policy & SAC management. The forest is far more important economically than the main dune system which incidentally is effectively barred to the public apart from two public footpaths. The main dune system of the Warren is a no go area for most people and only accessible to those provided with permits.

Given the importance of the forest to the people of Wales & for local tourism steps need to be taken to protect this very important forest from inappropriate recommendations in the future. We hope you will agree that action is urgently required to ensure that the forest is protected in its entirety and that the services it provides: environmental; health; recreational and otherwise are safeguarded for future generations.

Yours sincerely,

*P.S.*

*Caroline Spelman has just had to make a humiliating statement to parliament. It is very apt and applies equally to the public view in Wales. It is a powerful reminder of how the public feel about their forests and their benefits.*

*Environment Secretary Caroline Spelman's statement to parliament, 17/02/11:*

*Re. abandoning the proposed sell off of England's public forests*

*Spelman told MPs: "If there is one clear message from this experience, it is that people cherish their forests and woodlands and the benefits they bring. My first priority throughout this period of debate has been securing a sustainable future for our woodlands and forests."*

*The same applies to the people and forests of Wales.*