

## England Tree Strategy

Consultation response by Wildlife and Countryside Link

September 2020

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 57 organisations to use their strong joint voice for the protection of nature. Our members provide evidence about and campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect more than 750,000 hectares of land and 800 miles of coastline.

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### INTRODUCTION

We welcome the England Tree Strategy Consultation as an opportunity for Government to develop an approach to trees and woodland in England that is proportionate to the scale of the climate and ecological challenges ahead whilst securing the multiple societal and economic benefits which trees and woodland can offer. Of course, trees and woods must form part of a diverse, well-functioning ecosystem. A tree strategy should not stand alone – it should be integrated closely with protection and improvement of other species and habitat types, agriculture, public access routes and historically and culturally valuable sites and landscapes.

Just as significant, environmental policy must form part of a cohesive government agenda and the final Tree Strategy should have an implementation plan that is shared across government, with specific departmental delivery objectives, targets and actions. To ensure accountability across government, progress should be reported annually to Parliament as part of the Environmental Improvement Plan reporting framework. This will need to be mirrored at local level within each Local Nature Recovery Strategy Area or Local Environmental Improvement Plan.

The consultation document recognises the urgency for action and the scale of opportunity, but a higher level of ambition and specificity is needed in the final strategy to ensure that it delivers the benefits of more trees and woods with good value for money.

In particular, we propose:

1. Tree cover targets for England
2. A strategic approach to spatial targeting of woodland expansion through a Nature Recovery Network
3. National datasets to be updated regularly, and that are fit for purpose and shaped by local, democratic decision-making
4. A greater role for natural regeneration in woodland expansion and linkage
5. Better and context-appropriate management of existing woodlands
6. Improved protection for and management of ancient woodland and ancient and veteran trees
7. Regulation, enforcement and voluntary certification schemes
8. Sufficient funding to expand tree cover at the right scale in the right way

In other words, a climate-conscious, biodiversity-enhancing, long-term spatial strategy to ensure the **right number** of trees, of the **right kind**, in the **right places**, under **sustainable management** and **effective regulation** with **sufficient funding** for expansion and maintenance of woodlands and other tree cover.

We refer you to individual Link members' responses for detailed critiques of the Strategy and supporting evidence.

### **The right number of trees: Tree cover targets for England**

An effective strategy needs baselines and targets against which progress can be measured. Historically, UK Governments have looked to Scotland and Wales to deliver the bulk of UK tree planting. Recent funding announcements suggest that this is set to continue, with Scotland and Wales seemingly expected to deliver 80% of UK tree planting by 2024<sup>1</sup>. This would mean that the England Tree Strategy would direct only a very small proportion of the pledged 30,000ha of trees per year, and leave woodland cover in England largely unchanged. This is inconsistent with the aims articulated in the Strategy of 'unprecedented afforestation in England' (pg. 6).

The England Tree Strategy needs to articulate how much of England will contribute to the expansion of tree and woodland cover required to meet our net zero target by 2050<sup>2</sup>. Friends of the Earth research suggests that there is potential land available to double England's tree cover to 20% without impinging on mapped priority habitats, designated sites or valuable farmland<sup>3</sup>. However, not all priority open habitats and species have been adequately mapped. More comprehensive mapping of priority open habitats is essential, as are site-specific assessments to ensure that existing open habitats, or opportunities to expand them are not compromised by tree planting. In some areas, previously forested sites should be restored to open habitats rather than being replanted with trees, in line with the Forestry Commission's 2010 policy – for example on afforested lowland heathland. Clear targets for tree cover would also help to bolster the UK nursery industry by giving them certainty regarding demand.

Woodland expansion must involve quality, not just quantity. The Tree Strategy must set out a suite of national targets and sub-targets for expanding and connecting our trees and woodland that combine quality and quantity. This should include:

- **An ambitious target for tree cover in England.** A target must reflect the need for greater ambition than the 25 Year Plan commitment of 12% by 2060 and be consistent with the UK-wide recommendations from the Committee on Climate Change (including their recent land use<sup>4</sup> and net zero<sup>5</sup> reports). This target must integrate with the targets being brought forward through the Environment Bill and related secondary legislation, the Committee on Climate Change forthcoming 6th Carbon Budget and with local woodland cover targets set in Local Nature Recovery Strategies.
- **To meet this will require an annual rate of tree cover expansion of at least 10,000ha per year by 2025 in England, of which at least 6,000ha are native trees.** This is necessarily greater than the Government's current commitment of 6,000ha per annum in total, and

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<sup>1</sup> Spring Budget 2020, HMT <https://www.gov.uk/government/publications/budget-2020-documents/budget-2020#budget-report>

<sup>2</sup> The Committee on Climate Change's 6<sup>th</sup> Carbon budget, due in December, is expected to make recommendations on woodland expansion required in each of the devolved nations.

<sup>3</sup> [https://policy.friendsoftheearth.uk/insight/finding-land-double-tree-cover?\\_ga=2.179958820.1439359193.1596018703-1761389663.1593772264](https://policy.friendsoftheearth.uk/insight/finding-land-double-tree-cover?_ga=2.179958820.1439359193.1596018703-1761389663.1593772264)

<sup>4</sup> <https://www.theccc.org.uk/wp-content/uploads/2018/11/Land-use-Reducing-emissions-and-preparing-for-climate-change-CCC-2018.pdf>

<sup>5</sup> <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

further increases in rate of expansion after that will be required to reach 17% by 2050. These targets must, as with the 17% tree cover by 2050 goal, integrate with the targets being brought forward through the Environment Bill, and related secondary legislation, and with local woodland cover targets set in Local Nature Recovery Strategies

- There should be additional targets for:
  - A net increase of trees outside of woods (TOWSs) across England by 2025. We have lost around half of our TOWs since the 19<sup>th</sup> Century due to land use change and industrial agriculture. Ash Dieback currently threatens many more TOWs. This target should be supported by specific sub-targets for agroforestry and hedgerows. For example, the Climate Change Committee recommended a 40% increase in their extent by 2050 to help achieve net zero.
  - A minimum of 10,000ha protected each year by 2025 to promote new woodland established by natural regeneration. A target, linked to financial support, is an important signal to land managers that natural regeneration is a legitimate means of woodland creation for which they would be rewarded. 10,000 ha should be seen as the bare minimum – we feel there is potential for the protection of 25,000 ha per year up to 2030, a scale of protection that would be commensurate with the scale of biodiversity loss and the need for carbon sequestration.
  - A minimum of 1,000ha per year of previously forested land restored to open habitat. Very little progress towards this ambition stated in the Forestry Commission's Open Habitats Restoration Policy 2010, with the last two years showing net loss. A clear target with a workable policy based on this ambition should be created.
  - A minimum of 75% of woodlands in either good condition or improving for nature by 2030. We are presently far from this ambition.

The Tree Strategy should establish a process for reporting on, refreshing and where necessary refining the above targets. This must involve stakeholder input and should be undertaken alongside an equivalent process for protection of trees and woods. This should be stipulated in the Environment Bill in connection with local and national strategies and improvement plans.

### **Trees in the right places: An effective approach to spatial targeting of woodland expansion**

#### *Protecting valuable open habitats and public access*

We need more trees and woods, but they will not be appropriate everywhere, and the value that local communities derive from trees and woods will differ across the country. The strategy and the way it is promoted and delivered must not undermine the conservation of other important habitats and landscapes or their associated wildlife.

The expansion of trees and woods should be integrated with other land uses and objectives at the landscape scale. Trees and woods must not be unpicked from the overall objectives for nature, and people's connection with nature, as set out in the 25 Year Environment Plan or the forthcoming Nature Strategy and Nature Recovery Network. Local Nature Recovery Strategies should also provide a framework for local tree planting schemes, integrating these new woodlands with other habitats.

In particular, protection and restoration of open habitats, such as species-rich grassland, peatland and heathland, alongside woodland expansion is crucial for nature's recovery. Progress towards the Government's 2010 ambition of restoring 1,000ha of forestry per year to open habitat has been

woeful, with the last two years showing a net loss<sup>6,7</sup>. This demonstrates why the Forestry Commission's 2010 Open Habitats Restoration policy is not working in light of new woodland expansion targets. A new approach is required which is compatible with the Government's commitment to creating a Nature Recovery Network and does not place compensatory planting requirements on those proposing habitat restoration projects outside protected areas. The regulatory barriers holding back open habitats restoration also need to be addressed, including the difficulty of obtaining felling licences in restoration programmes. Improved local and central tracking of tree cover losses to development is also needed to ensure that habitat creation and restoration projects are not unduly limited in response to these. The open habitat ambition should be upgraded to a target, integrated with the peatland and other relevant strategies and with the 25 Year Environmental Plan commitment for all soils to be sustainably managed by 2030.

The need for a National Habitat map to guide appropriate tree-planting is clear in the draft Strategy's proposals on planting trees for rivers and water, which could be more nuanced to recognise variety in riparian habitats. Rivers with important aquatic and marginal plant communities or that are adversely affected by low flows/water levels would often not be suitable for tree-planting. Nor would areas where riparian trees may compromise the quality of other valuable high nature riparian habitats such as floodplain meadows, or where access is required for emergency purposes. Whilst trees and woodland have a valuable role in flood protection and water quality, relevant land use planning and management policies to improve resilience will have substantially greater success by enabling the creation and restoration of a wider range of habitats in the right place to deliver necessary nature based solutions and natural flood management.

A better aim could be encapsulated by entitling this "planting trees for water", with support for tree/woodland establishment in strategic locations within catchments where they can help to slow, store and filter the flow of water from the land, alongside equal recognition of wet grasslands, marsh and other relevant habitats. For example, a mosaic of wet floodplain woodlands and meadows are far more effective than thin riparian strips for intercepting sediment (soil) and taking up nutrients running off the land; whilst planting adjacent to headwater streams or steep wooded ghylls in upland catchments can benefit watercourses by reducing water temperature and sediment input. The Environment Agency should be invited to share information on where best to plant trees and at what scale to reduce flood risk, improve water quality and cool rivers.

Furthermore, trees planted on 'Countryside and Rights of Way Act' open access land could lead to the loss of CRoW rights when the open access maps are updated, as recognised in the consultation annex. Public money should not be used to subsidise schemes that threaten existing access rights. A way around this could be to extend CRoW open access rights to woodland, particularly in peri-urban areas.

We support the proposal in the consultation to facilitate priority-setting and decision-making for woodland expansion at the local level, through Local Nature Recovery Strategies, provided that it is guided by national targets and that governance mechanisms are sufficiently resourced and underpinned by high quality national and local environmental datasets, effective information

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<sup>6</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/713805/england-open-habitats-policy-march-2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/713805/england-open-habitats-policy-march-2010.pdf)

<sup>7</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/901578/Forestry-Commission-Key-Performance-Indicators-2019-20-.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901578/Forestry-Commission-Key-Performance-Indicators-2019-20-.pdf)

systems and ongoing monitoring and reporting to ensure that strategic woodland expansion and linkage is guided towards appropriate locations. These locations should include small sites of importance to rare and threatened species, with expansion being planned to help protect and enhance these sites.

#### *Site assessments and advice*

Planting of even small pockets of woodland on priority habitat could have adverse effects on some important species. For this reason, site surveys, robust carbon accounting, and expert habitat protection and enhancement advice will be essential to determine whether woodland creation or expansion is appropriate in a given area. For example, the beneficial impacts of floodplain planting can vary hugely depending on the location and the type of trees planted alongside the interaction tree planting has with other floodplain habitats such as wet meadows – expert advice is needed to evaluate and compare tree and woodland’s contribution compared to other habitats and to ensure there will be overlapping benefits for flood defence, water quality and biodiversity.

For land managers looking to establish new woodland through ELM, their choices should be guided by the local priorities set out in the LNRS and they should have access to high quality expert advice before making their decision. For biodiversity and environmental net gain, there must be investment in a comprehensive network of local government ecologists to advise developers on woodland expansion decisions, which includes consideration of the location of new woodland in relation to the functional impact on species and habitats where losses have occurred.

#### *National data requirements*

For the England Tree Strategy to truly deliver for nature, areas of tree cover expansion must be guided through a strategic spatial approach informed by a Nature Recovery Network so that they can effectively create bigger, better, and more joined-up woodlands, hedgerows, trees and scrub thriving with wildlife and accessible to people, while ensuring protection of other vital habitats where tree planting may be ecologically damaging.

At the national level, the National Habitat Map (as required by the Environment Bill) should inform strategic targeting of the 500,000ha of priority habitat, including trees, scrub, woodland and other habitats, that will form a Nature Recovery Network, plus measures in the wider countryside to secure nature’s recovery. The National Habitat Map must be underpinned by high quality environmental data of sufficient granularity, and well-designed information systems to provide national and local decision making, reinforced with site-level surveying of habitats and species for significant individual projects. The Nature Recovery Network must also be supported by clear governance, obligations and decision-making processes, with provisions to secure its role long-term. It must also be joined-up with other strategic processes, including for peatlands, and - via Local Nature Recovery Networks - with an Environmental Land Management System, and development planning.

However, the availability and quality of environmental data for different places, taxa and habitats varies. Many datasets are privately owned and therefore require paid-for licences and data sharing agreements, such as the National Soils Dataset owned by Cranfield University, and many Ordnance Survey datasets whose licences are problematic for large-scale assessments outside of Government institutions. Other datasets are out-of-date or incomplete and require urgently updating, such as Natural England’s inventories for Peat, Priority Habitat, Ancient Woodland, Valuable Grassland and Open Mosaic Habitat. Other datasets are non-existent. Where individual councils produce their own maps and inventories, as has been done by Surrey County Council for instance, these should follow a

consistent methodology, e.g using UK HAB, so they can contribute to a national dataset. Use of appropriate buffers that are protective of interest features and identification of sites with high potential for habitat restoration will also be necessary.

Without the right data, neither Government nor local stakeholders will have the means to make strategic decisions about woodland expansion as envisaged in the consultation. We recommend that Government urgently assesses local and national information needs of meeting all its environmental commitments in the 25 Year Plan, Environment Bill, CBD and elsewhere, and undertake an audit of current data quality, coverage and availability and the fitness of existing information systems in order to implement the required improvements. Government should then create a National Environmental Information Framework to:

- Seamlessly link local and national environmental data provision and information services across the whole environmental information spectrum
- Collate and consolidate environmental data (including for habitats, species, site condition, opportunity areas, and wider environmental parameters like water quality, flood risk, carbon, public access etc.), to make better use of existing data and add new data where a need is identified
- Use new and existing digital platforms to make environmental data of known origin and quality accessible in a range of formats to those who need environmental information in a truly interoperable way, in accordance with the FAIR Principles,
- Formalise agreements with those that collect, hold and manage data (e.g. universities, specialist recording schemes, and Local Environmental Record Centres) that will sustain ongoing and targeted data collection, curation and provision
- Put in place processes and funding mechanisms for keeping environmental data up-to-date, including through monitoring and citizen science, and supporting recording, monitoring and quality assurance

A robust National Habitat Map, a cohesive National Environmental Information Framework based on data suited to local planning and development and delivery on ground to link across LNRS areas in a truly seamless way would significantly speed up, simplify and improve planning and decision-making processes concerning land use and the environment, not just woodland expansion, whilst recognising the importance of site-level surveys and ground-truthing prior to conversion to woodland. With adequate high quality, accessible, standards compliant data – and intelligent, interlinked information systems, Government could streamline land use decision-making by integrating environmental, social and economic considerations into a national spatial plan and/or land use strategy as well as ensuring that LNRS decisions would be adequately evidenced.

#### *Local governance*

With clear national objectives, guidance, access to high quality environmental data, tailored information systems and incentives from Government, local communities and stakeholders should be empowered to make their own decisions about woodland expansion. The overall objective of Local Nature Recovery Strategies (LNRS) is the delivery of the Nature Recovery Network, placing local Nature Recovery Networks on a statutory footing. Native trees and woodland habitats have an essential role to play in this through natural regeneration, new planting, bringing existing woodlands into better ecological condition, and restoring wood pasture and hedgerows. LNRSs should be prepared and published by a responsible authority which includes representation from a range of locally appropriate and well informed organisations to draw on local knowledge, expertise and

opinions about where to integrate trees into the landscape in the rural and the within urban environment.

Governance processes for creating LNRS should draw on the expertise of existing bodies (e.g. Forestry and Woodland Advisory Committees, Catchment Partnerships, Local Access Forums, Regional Flood and Coastal Committees, National Park Authorities, AONB Partnerships, Local Nature Partnerships, Local Enterprise Partnerships) and existing environmental priorities (e.g. River Basin Management Plans, Rights of Way Improvement Plans, National Park and AONB Management Plans, Visual Impact Assessments, National Character Area profiles, Landscape and Visual Impact Assessments). To be truly democratic, LNRSs should also be subject to public consultation to ensure local communities which may not be part of existing fora have a voice. Defra should test ways of involving the relevant stakeholders and brokering local nature priorities, including for woodland expansion, in its LNRS pilots.

It is critical that, whatever governance processes are adopted for producing and implementing LNRSs, the responsible public body is sufficiently resourced to facilitate the necessary stakeholder engagement.

Priorities identified in LNRSs should then guide land use and management in their local area. For ELM, this will require a link between payments and local priorities to ensure land managers are incentivised to make decisions that fit with the characteristics of their local area. For local planning and spending decisions, the Environment Bill should be amended so that there is a stronger duty on all public bodies to take account of LNRS priorities early in the decision-making process.

#### **The right kind of trees: Natural regeneration**

Planting trees does not create a woodland. Forest ecosystems are diverse and dynamic environments which have developed over years, decades, and millennia. They contain complex ecological networks and relationships, both above ground and within the soils, between a huge array of diverse species. Natural regeneration is the best way of creating new woodlands for wildlife and expanding ancient semi-natural woodland by allowing these ecosystems to develop. Not only is it more cost effective than planting up sites, trees established by regeneration are more likely to be better adapted to local climatic and environmental conditions and will result in woodlands with a more natural species composition.

Natural regeneration of woodland should be one of the primary methods for increasing native tree cover, where suitable, supported by the planting of local native woodland species where necessary from nurseries of locally sourced stock. Natural regeneration should not be conflated with self-seeding of inappropriate species that have been planted previously, such as non-native pines and rhododendron. Non-native planting should only be considered where there is significant evidence that it will deliver biodiversity benefit, however in the majority of cases, particularly in rural areas, we do not expect this significant evidence to exist.

Within urban areas, natural regeneration opportunities are more limited due to the fragmented nature of land and its multiple uses but should still be the preferred approach. The recognition of the value of natural approaches to woodland creation and the value of community involvement in the consultation document is welcomed. However, the final Tree Strategy must set out more clearly how this method of woodland creation will be incentivised.

Areas of natural regeneration must be strategically located next to/connected to existing areas of high-quality native woodland or hedgerow habitat to increase habitat connectivity and permeability.

This provides areas of regeneration with the necessary seed banks and species assemblages required to develop diverse and resilient woodland habitats.

Additionally, woodland-succession habitats, such as dense thorny scrub and woodland pasture, must be recognised as key elements of the natural regeneration process and receive support through woodland creation grants. Thorny scrub protects young saplings by providing a natural tree guard against damaging grazing activity by deer and provides important habitat for a number of key open-woodland and woodland-edge species, increasing biodiversity within woodlands.

Successful natural regeneration of woodland habitats can be encouraged through the restoration of ecosystem services and the reintroduction of key species. This allows the regeneration of woodland which is more biologically and structurally diverse, more suited to local conditions, does not rely on polluting plastic tree guards, and requires far less monetary investment. The consultation acknowledges that the reintroduction of formerly native species can play an important role in woodland creation. It is critically important that any species reintroductions are evidence-based and follow accepted IUCN criteria, including considering the context of the entire ecosystem and not simply used as a tool to increase commercial tree planting success.

By integrating woodland into wider environmental recovery planning, opportunities for mixed habitat creation can be identified. For example, integrating glades and rides can help provide important open habitats contiguous with wooded areas. Such environmental planning should maintain the flexibility required to balance the natural regeneration of woodland with the need to protect ponds and other priority open habitats.

#### **Trees under sustainable management: Better management of existing woodland**

Less than 10 per cent of our native woods are in good condition for nature. Trees and woodlands in the UK must not be managed solely for carbon storage at the expense of biodiversity and other natural capital - although they will have a vital role in mitigating and adapting to climate change. Trees in urban environments must be better protected so they can continue to play vital roles in providing clean air, noise reduction, flood alleviation, and carbon storage as well as sustaining and enhancing urban biodiversity. Veteran trees, of which Britain has one of the highest populations in Europe, should also receive special attention, to better preserve them and the unique biodiversity benefits they provide<sup>8</sup>.

Similarly, a commitment to restoring Planted Ancient Woodlands Sites (PAWS) needs to be made, to re-establish areas of biodiversity-rich ancient woodland. The 2005 Keepers of our Time policy statement<sup>9</sup> on ancient woodland should be reviewed, with a view to renewed targets, responsibilities and timings being set.

The needs of our woodlands should be supported to achieve the target of a minimum of 75% of woods being in either good condition or improving for nature by 2030. Land managers should be

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<sup>8</sup> <http://publications.naturalengland.org.uk/publication/75035?category=551045>

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/778106/KeepersofTimeanw-policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778106/KeepersofTimeanw-policy.pdf)

incentivised to effectively manage, monitor and enhance the stock under their responsibility, drawing on expert guidance on what constitutes sustainable woodland management<sup>10</sup>.

Any incentives to increase management of woodlands must be holistic and recognise the wide range of ecosystem services provided by different woodlands and woodland habitats (including closed-canopy woods, wood pasture, open areas within woodland, trees within open landscapes, urban trees and successional woodland, including thorny scrub). Incentives for woodland management which focus on maximising carbon capture or timber output at the expense of biodiversity and ecosystem services would be a disaster for ambitions to address the dual climate and ecological crises, and meeting the goals of the 25 Year Plan and forthcoming targets in the Environment Bill and Convention on Biological Diversity.

There is huge potential for the nation's forests to be used as an exemplar to demonstrate this more ecological approach, including expanding the area of new native woodland on the public forest estate and expanding the estate itself through land acquisition, with a view to increasing the domestic supply of hardwood timber in the future.

#### **Effective regulation for trees: Regulation, enforcement and voluntary certification schemes**

We disagree with the assertion in the consultation that UK Forestry Standard (UKFS) is self-regulating. It is not an auditable standard, and it comprises some legal requirements and some guidelines. At present it is only checked when someone applies for a felling licence, grant or EIA, and even then, it may only be a desk-based exercise. The Forestry Commission has very few woodland officers regulating and supporting the private forestry sector. The Tree Strategy should commit to a better resourced and regulated UKFS with better enforcement to assess implementation of plans, progress toward intended outputs, the agreement of ameliorative activities where appropriate and compliance with legal obligations. Proportionate enforcement and advice will be crucial to achieving the Strategy's aims.

However, achieving targets for woodland expansion and biodiversity recovery will require going beyond minimum standards for commercial forestry, for example through increased uptake of certification to the UK Woodland Assurance Standard (UKWAS), through the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC) schemes, and adoption of species advice within the Woodland Wildlife Toolkit<sup>11</sup>. Such increases in uptake will need to be sizeable - uptake of UKWAS in England has fallen over the last decade to 25% of woodland area (the UK average is 44%)<sup>12</sup>.

Market-led certification should not be a replacement for regulation but is a credible supplement for achieving good standards. This should be recognised in the final Strategy.

Government should aim for more effective enforcement of UKFS as a basic standard, plus greater uptake of voluntary certification schemes.

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<sup>10</sup> A sample of such guidance can be found here:

<https://www.woodlandtrust.org.uk/publications/2010/02/sustainable-forest-management/>

<sup>11</sup> <https://woodlandwildlifetoolkit.sylva.org.uk/>

<sup>12</sup> <https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestry-statistics/forestry-statistics-2019/woodland-area-and-planting/certified-woodland-area/>

Large-scale commercial timber production is important, but as a commercial activity should not rely on public funds. However, where schemes include native woodland creation, and other priority habitats beyond that required by the UKFS, or they have demonstrable potential to offer significant and additional cost-effective carbon capture without negatively impacting biodiversity, they should remain eligible for public support. For example, forests meeting FSC's Ecosystem Services verification.

EIA regulations governing afforestation are an essential environmental safeguard and we strongly reject any case for their dilution. Frustration with obtaining EIA consents relates primarily to the timeliness of decision making and the availability of evidence. This should be addressed by properly resourcing the regulatory process, not by undermining it. The Tree Strategy should confirm that EIA regulations concerning afforestation will be retained in their current form and with robust implementation. Expectation of increased woodland cover in England means that additional resources should be committed to the effective management of the existing EIA process.

### **Sufficient funding for trees: Investing in delivery**

To increase canopy cover to the extent that is needed, and in a way that delivers multiple, integrated benefits, will require significant investment of public money. Land managers, including commercial foresters, will need to be remunerated for delivering environmental and societal benefits beyond legal requirements, and better regulated to ensure no one undercuts regulations. There is also scope for significant blending of public and private finance where trees and woods are concerned, but the private sector requires the right signals and frameworks from Government to encourage them to invest.

In the Comprehensive Spending Review 2020, dedicated capital investment should be allocated for:

**Urban and peri-urban trees.** This is a large-scale, capital-intensive investment, but it offers high value for money, especially in terms of human health and wellbeing benefits. For example, National Trust research shows a return of £200 billion in physical and mental health benefits for £5.5 billion invested in urban green infrastructure<sup>13</sup>.

**Land acquisition to expand the area of biodiverse, native woodland habitats.** To meet targets for woodland expansion, the Government should support the acquisition of suitable land for native, biodiverse assets including open habitat for the benefit of people and wildlife. It may be effective to have such new woodland managed through a community forest (following the example of the Northern Forest<sup>14</sup>).

**Integrating trees into a net gain habitat bank.** A habitat bank will be required to make biodiversity net gain a success in cases where the mitigation hierarchy (avoid, mitigate, compensate) has necessitated compensation and where the preferred option of on-site or adjacent is not possible. Whilst this habitat bank is best set up through the Environment Bill and its secondary legislation, Government should signal in the Tree Strategy how trees will be integrated into this habitat bank, acknowledging that new woodland is not a functional replacement for mature native woodland losses to impacted species.

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<sup>13</sup> <https://www.vivideconomics.com/wp-content/uploads/2020/07/Greenkeeper-Report-for-FPA-Greening-Programme-July-2020.pdf>

<sup>14</sup> <https://thenorthernforest.org.uk/>

**Sufficient budget for all three tiers of ELM (including transition funding in the run up to 2024).** The design of ELM must retain focus on what ELM is aiming to achieve and focus funding on delivery of non-market public benefits. It is not a subsidy for production. Tier 1 should incentivise whole-system approaches like agroforestry and silvo-pasture which deliver genuine benefits beyond regulatory compliance, plus multi-annual funding for management of existing trees and woodland, and support for the restoration and improved management of hedges. Tier 2 should incentivise targeted habitat creation including woodlands and shelter belts, natural regeneration and the management and restoration of ancient woodland. Tier 3 should incentivise trees at landscape scale, particularly through natural regeneration and rewilding.

**National Nature Service.** Afforestation at this scale needs spades in the ground. To make this a reality and simultaneously address the mass unemployment expected from Covid-19, Government should fund a National Nature Service (NNS) that employs and trains people in environmental management, including afforestation and hedge creation. To succeed, living wage jobs must be accompanied by investment in the environmental organisations who will manage NNS recruits, and a pipeline of environmental projects for the NNS to deliver. Delivery of urban and peri-urban woodland regeneration and planting schemes would provide a direct opportunity for training and employment through the NNS as well as increasing access and engaging people with trees and woodland.

**Support for agroforestry:** Agroforestry has the potential to make a significant contribution to ETS objectives<sup>15</sup>, combining support for economic benefits with the delivery of multiple environmental outputs, including the establishment of new trees and enhanced management for existing trees and woodland. Intervention is needed to grow agroforestry, including financial support for establishing new agroforestry, improved advice and guidance to land managers on assessing appropriate agroforestry options as part of ELMs and support for the development of markets for new products from agroforestry.

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Woodland Trust (WT)

Worldwide Fund for Nature (WWF)

Butterfly Conservation

Buglife

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<sup>15</sup> <https://www.woodlandtrust.org.uk/plant-trees/agroforestry-benefits/>

League Against Cruel Sports  
The Wildlife Trusts (TWT)  
Floodplain Meadows Partnership  
Royal Society for the Protection of Birds (RSPB)  
Peoples Trust for Endangered Species  
British Mountaineering Council  
Wildlife Gardening Forum  
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