

Environmental Targets briefing from Wildlife and Countryside Link & Greener UK The Environmental Targets (Woodland and Trees Outside Woodland) (England) Regulations 2022

Summary

- The target for canopy cover by 2050 has been lowered from 17.5% to 16.5%. This means that the target is no longer aligned with the Climate Change Committee's recommendations for afforestation rates.
- The reduction runs contrary to the result of the targets consultation, which saw of a large majority of respondents recommend that the target be increased.
- The reduced target includes an expectation that the proportion of new woodland that is coniferous will more than double compared to current rates. Such an approach would reduce the target's ability to contribute to nature's recovery and limit the long-term carbon storage potential of new woodland.

This statutory instrument was laid in draft under the affirmative procedure on 15 December 2022 under [Section 1](#) of the Environment Act 2021. It will place a legal duty on the Secretary of State to increase woodland and tree canopy cover to 16.5% of land area in England by 2050. The Government has [calculated](#) the current canopy cover, comprised of woodland and trees outside woodlands, to be 14.5%.

We wish to highlight that:

The woodland and tree canopy cover target is a lower level of ambition than first proposed

The target [consulted](#) on in Spring 2022 was for 17.5% woodland and tree canopy cover for England by 2050. This figure was in line with the recommendation made in the Climate Change Committee's [Sixth Carbon Budget](#) (p170) for 18% canopy cover across the UK by 2050. It should be noted that Scotland is significantly more forested than England. This would drive the overall UK figure up to 18% if England reached 17.5% by 2050.

In the target now before Parliament, the level of ambition has been lowered from 17.5% to 16.5%. Given that the Government estimates that woodland and tree canopy cover is currently at 14.5%, this means that ambition for woodland creation has effectively been cut by a third. A number of eNGOs have expressed concern at the reduction, with the CEO of the Woodland Trust, Darren Moorcoft, [commenting](#): *"Slashing tree targets by a third from what was consulted on is highly disappointing at a time when ambition and action is so desperately needed."*

It should be noted that RSPB has a slightly different view and accepts the 16.5% tree cover target for now, in recognition of the range of logistical pressures that are making it difficult for Defra to achieve current targets (between 2016 and 2021 the [average annual amount of woodland](#) created in England stood at 1,700 hectares, against a [Defra aspiration](#) for 7,000 hectares). There is an ongoing discussion around whether an ambitious target is unachievable, or whether it would in fact act as a catalyst for increased progress on the ground.

Defra Ministers should make a public commitment to swiftly reviewing the canopy cover target (this is hinted at in the [Defra response](#) to the Secondary Legislation Scrutiny Committee's report on Environment Act targets).

If progress has been in lifting woodland creation rates, the ambition of the canopy cover target should be raised, to align it once more to Climate Change Committee recommendations for afforestation rates.

The lowered ambition goes in the opposite direction than that proposed by consultation responses

The [analysis of responses](#) to the Spring 2022 consultation reports that of 7,137 respondents to the question 'do you agree with our proposed level of ambition for the canopy cover target?' 6,572 respondents (92%) disagreed. When asked to give their [reasons](#) for disagreeing with the level of ambition, 6,560 (98%) of question respondents "*referred to target ambition, the most popular theme being general statements on increase the level of ambition*". As summarised in the explanatory memorandum for the SI, "*a large majority of those who disagreed with the level of ambition supported a higher target for canopy cover by 2050*".

Despite this clear steer from consultation responses, the Government has lowered the canopy cover target to 16.5%. The Secondary Legislation Scrutiny Committee's [report](#) on Environment Act targets presents the Government's response to the question we asked about why this change was made, stating that "*this was a decision made by Defra on the basis of recent data on tree planting and the tree planting pipeline*". It is disappointing that this post-consultation decision was made without engagement with stakeholders, and without consideration of [evidence](#) on how an increase in woodland creation could be realistically achieved once an ambitious target is in place.

The proportion of coniferous woodland has been increased to the detriment of nature & climate

Between 2016 and 2021, 14% of the woodland planted in England [was coniferous](#). The Impact Assessment produced alongside the target states that, up to 2050, the proportion of new woodland in England that is coniferous is expected to more than double, to 30%.

Again, this decision runs contrary to the approach proposed in the consultation, which suggested a proportion of 20% coniferous by 2050, and to the direction of consultation responses. [Recommendations](#) for wildlife-rich woodlands composed of broadleaf native trees to be maximised through the canopy cover target appear to have been ignored, along with other proposals for biodiversity-boosting policies including a sub-target for native woodlands created for conservation, measures to encourage sustainable woodland management and support for healthy hedgerow habitats that connect woodland.

Coniferous woodland (usually, but not always comprised of non-native species) provides lesser return for wildlife and, in the long term, for carbon, compared to native broadleaf woodland. [In the words](#) of Natural England Chair Tony Juniper "*all types of woodland have value, but I believe that those dominated by native broadleaved species generally provide the most benefit for wildlife and people. Native woodlands support a quarter of the UK's priority species and those with a diversity of tree species are more resilient to disease.*"

This increased resilience to disease, and the longer time period broadleaved native trees tend to spend in the soil, mean that over the long term broadleaved native woodlands can offer greater carbon benefits than coniferous woodland. The Impact Assessment compares the approach taken in the regulations (16.5% canopy cover by woodland, with 30% of new woodland being coniferous) with the approach consulted on (17.5% canopy cover by woodland, with 20% of new woodland being coniferous).

It [reports](#) (p40) that the Government's new canopy cover target will save only 75% of the carbon than the consulted-on target would have done (111 vs 148 MtCO₂ by 2100).

The Government's new approach risks a return to the 'sprint for spruce' which caused [significant ecological issues](#) in the twentieth century, with an increased proportion of coniferous woodland delivering less for nature and climate than the broadleaf alternative.

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