The Wildlife Trusts

The Wildlife Trusts' Response to Defra's England Tree Strategy Consultation Document

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Executive Summary

We are in a dual climate and nature emergency and urgently need to take action to address this. We are also beginning to see the impacts of a disconnection crisis, with a progressive decline in interactions with nature. The England Tree Strategy must set out how new trees and woodlands will play a role in tackling the climate and nature emergency through protecting, connecting, and expanding high nature-value habitats, as well as ensuring new and existing woodlands delivers the many values of trees and woods to the people who need them most.

Our vision is for 30% of land to be connected and protected in a Nature Recovery Network which allows nature to thrive once more. Expanding tree and woodland cover in England has a huge role to play in helping rebuild ecological networks, delivering nature's recovery, bringing nature into the lives of people who need it most, and tackling the climate crisis.

A Nature Recovery Network - New areas of tree cover expansion must be guided by a Nature Recovery Network so that they can effectively create bigger, better, and more joined-up trees and woodland habitats, thriving with wildlife and accessible to people, while ensuring protection of other vital habitats where tree planting may be ecologically damaging. Past efforts to drive an increase in tree cover has destroyed important open habitats, reduced biodiversity, and eroded the carbon stocks in our soils. As well as expanding and protecting our trees and woods, the England Tree Strategy must set out how high-value open habitats, and areas where these habitats could potentially be restored and connected, will be protected from inappropriate tree planting.

Valuing Woodlands - The public goods provided by trees and woodlands must be fully recognised and adequately valued. Areas of public funding and private finance should be blended to provide woodland owners with the full value of the public services and natural capital they provide, and to provide woodland managers with a regular financial return. Any incentives for expanding and creating new areas of woodland must be allocated and valued within Local Nature Recovery Strategies, to ensure the right tree is planted in the right place.

Natural Regeneration - When expanding and creating new areas of woodland, natural regeneration of woodland should be the preferred method for increasing tree cover where it is possible and where it will benefit nature, augmented by the planting of locally native woodland species where necessary from nurseries of locally provenance stock. Natural regeneration should receive support through any incentive schemes to increase tree cover in England.

Protecting and Improving Trees and Woodlands - While new trees and woodlands are needed to address the nature and climate emergencies, the UK's existing woodland habitats must be better protected and managed for nature first. The England Tree Strategy must set out how existing trees and woodlands will be better protected from damaging activities, better managed to deliver public goods, and how habitats previously damaged by inappropriate planting will be restored.

Engaging People with Trees and Nature - The Wildlife Trusts have a vision of a thriving, wildlife-rich environment which benefits our physical and mental health. We want to ensure that every person has the opportunity to experience wildlife in their daily lives and reduce inequalities in access to nature. Creating new woodlands and Community Forests close to these communities through local Nature Recovery Networks will ensure that woods are connected with people who need them most, providing these communities with opportunities to exercise, learn, and engage with nature on their doorstep.

Introduction

We are in the midst of a climate and nature emergency – an emergency which will have a profound impact on our environment and on how we manage our land and the trees and forests within it. In addition to this, we are also beginning to see the impacts of a disconnection crisis, with many people undergoing an extinction of experience, with a progressive decline in interactions with nature[1].

The Wildlife Trusts believe that the health of the environment must be at the heart of future tree and forestry policy in England to combat these emergencies – which means the development of an England Tree Strategy which delivers for nature, people, and the climate. It needs to set out how trees, woodlands and forests will be better protected, expanded, and connected to deliver multiple benefits in supporting biodiversity, enhancing wellbeing, and mitigating climate change.

The Wildlife Trusts want to see active recovery for nature happening across at least 30% of our land and sea by 2030 for people and for wildlife - 30/30.

Our vision is for 30% of land to be connected and protected in a Nature Recovery Network (NRN) which allows nature to thrive once more. A network for recovery is based on the principles set out in the Lawton Review[2] - that there is more, better, bigger, and more joined up space for nature.

A Nature Recovery Network would comprise:

- **Core areas** in which the conservation of biodiversity is the prime purpose (e.g. nature reserves, SSSIs, Local Wildlife Sites)
- **Recovery areas** where habitats are restored and new habitat created, at a range of scales. and may also be protected, or may have another, compatible land use (e.g. extensive grazing in woodland pasture)
- **Set in a wildlife friendly landscape** (both rural and urban) containing corridors and steppingstones of habitat which provide essential ecological or environmental connections (e.g. farmland in countryside stewardship)

The Wildlife Trusts believe that England needs to increase its native tree cover to help rebuild ecological networks, deliver nature's recovery, improve people's health and wellbeing, and tackle the climate crisis. The need to increase tree cover in the UK to address falling biodiversity and rising global temperatures has been recognized in the Committee on Climate Change's net zero advice, which recommends an expansion of UK woodland cover from the current 13% to at least 17% is needed by 2050[3]. The UK remains one of the least wooded countries in Europe, with 13% woodland cover compared to the European average of 38%[4]; in England woodland cover is just 10%.

The Government set out in the 25 Year Plan for the Environment an aim to expand woodland cover and to ensure existing woodlands are better managed to maximise the range of benefits they provide. While the Government has committed to 30,000 ha of new woodland across England between 2020 and 2025, recent figures show that for the year 2019-20 just 2,330 ha of new forest was planted in England[5]. These figures also

[1] Cox, D. T., & Gaston, K. J. (2018). Human–nature interactions and the consequences and drivers of provisioning wildlife. Philosophical Transactions of the Royal Society B: Biological Sciences, 373(1745), 20170092.
[2] Lawton et al. (2010) Making Space for Nature. Available at: https://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf
[3] Net Zero Technical Report (2019) Committee on Climate Change https://www.theccc.org.uk/publication/net-zero-technical-report/
[4] Forest Research Woodland Statistics https://www.forestresearch.gov.uk/tools-and-resources/statistics/statistics-by-topic/woodland-statistics/
[5] Forestry Commission Key Performance Indicators Report for 2019-20 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901578/Forestry-Commission-Key-Performance-Indicators-2019-20-.pdf

show that more than half (56 percent) of the new planting was conifers, which are mostly non-native plantations.

For our trees and woodlands to be able to deliver the Governments own targets for the climate and biodiversity, a step change in woodland creation is needed. Existing woods must be better protected and new areas of expansion must contribute to a wider Nature Recovery Network, ensuring that efforts to restore woodland habitats and enhance tree cover put the right tree in the right place and protect priority open habitats.

The Wildlife Trusts are a movement of more than 800,000 members, 40,000 volunteers, 2000 staff and 600 trustees, from a wide range of backgrounds and all walks of life. We manage over 2,300 nature reserves for the benefit of wildlife and people. We are commenting on Defra's Consultation on the England Tree Strategy in our capacity as land advisors and major landowners in our own right. We manage almost 100,000 hectares of land and provide advice to more than 5,000 landowners each year.

Consultation Questions

1. Would you like your response to be treated as confidential (please see this consultation's Data Privacy Notice?

No

2. What is your name?

Barnaby Coupe

3. What is your e-mail address?

bcoupe@wildlifetrusts.org

4. Please tell us about yourself (select one option):

I am responding as an environmental non-government organisation

5. What is your organisation?

The Wildlife Trusts

Responding to the Consultation Questions

The Wildlife Trusts welcome the tone and wording in the consultation document regarding the need for trees and woodland to deliver for wildlife and people, and for expansion of woodlands to be guided through a Nature Recovery Network. However, we are disappointed that the consultation questions do not reflect the tone in the document and are highly restrictive, focussed on removing barriers for planting trees to deliver for carbon and timber, thereby limiting the opportunity for respondents to respond in a comprehensive manner to all areas of the strategy.

We therefore include in our response answers to the consultation questions as well as supplementary information on questions that we believe are fundamental to creating an ambitious Tree Strategy.

- How should we decide where to establish new areas of woodlands?
- How can we best protect high-value open habitats from inappropriate planting?
- Where would new woodlands not provide a benefit to nature, people, and the climate?

A strategy which addresses these questions will avoid mistakes of the past where inappropriate decisions for tree planting destroyed important open habitats, reduced biodiversity, and eroded the carbon stocks in our soils.

Expanding and Connecting our Woodlands

We are in a climate and nature emergency and urgently need to take action to address this. The England Tree Strategy must set out how new trees and woodlands will play a role in tackling the climate and nature emergency through protecting, connecting, and expanding high nature-value habitats. The Wildlife Trusts want to see active recovery for wildlife happening across at least 30% of our land and by 2030.

Creating Space for Nature

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 more, bigger, better, and more joined-up woodlands, hedgerows, trees and scrub thriving with wildlife and accessible to people, while also ensuring protection of other vital habitats where tree planting may be ecologically damaging. The Nature Recovery Network should be the key spatial guidance and prioritisation mechanism for expanding and connecting existing woods and establishing new trees and woodlands, providing a mechanism to link woodland expansion to other sectors (such as agriculture and planning/built development).

A Nature Recovery Network

A Nature Recovery Network is a joined-up system of places needed to allow nature to recover and thrive. It is a combination of the existing places where wildlife is more abundant, and the places where habitats need to be restored or created in order to expand and connect the remaining fragments so that nature can recover. To be effective, it must extend across every part of England, including rural areas, coastal sites, towns and cities, and connect across boundaries with similar initiatives in the other UK countries and with the existing network of Marine Protected Areas. We want to see at least 30% of land managed to benefit nature to reverse declines, restore abundance and contribute to nature's recovery.

This process must be simple for land managers to interpret and put into practice. The Environment Bill includes a requirement for Local Nature Recovery Strategies that cover the whole of England. Each Local Nature Recovery Strategy will include a map of existing areas important for nature (covering protected sites and wildlife-rich habitats) and will identify key opportunities for enhancement – a Local Nature Recovery Network map. The LNRS, and local Nature Recovery Network maps, should provide the strategic framework for decision making to establish woodland in locations where it will most benefit nature, people, and the climate, allowing for robust and decisive decision making.

Local Nature Recovery Strategies

Local Nature Recovery Strategies will act as delivery mechanisms for the Nature Recovery Network and will place local Nature Recovery Networks on a statutory footing*. These strategies are to be prepared and published by a responsible authority and are intended to assist local authorities and other public bodies (including regional authorities) in identifying priorities and opportunities for conserving and enhancing nature.

The Wildlife Trusts can demonstrate the ambition needed and show by practical example how the mapping referred to in the components of the Local Nature Recovery Strategy must plan an ecologically coherent network that will truly enable nature's recovery.

*The Environment Bill explanatory notes https://publications.parliament.uk/pa/bills/cbill/2019-2019/0003/en/20003en.pdf

Wildlife Trusts have been mapping ecological networks and habitats over the past two decades, working in partnership with a range of NGOS as well as landowners, the health sector, and local authorities to develop a landscape scale approach to nature's recovery. The Wildlife Trusts can bring this experience to bear in developing further mapping with partners and engaging local organisations and people in this process.

We welcome the ambition of the England Tree Strategy to expand and connect woodlands as part of a national Nature Recovery Network. However, it is vital that woodland habitats which do not have nature's recovery as their primary goal, such as commercial forestry plantations, are not included within any measures for land counted towards a Nature Recovery Network.

The Wildlife Trusts support the proposal that Local Nature Recovery Strategies will play an important role in identifying suitable locations for tree planting, and these strategies should facilitate priority-setting and decision-making for woodland expansion strategy at the local level. Targets for woodland cover should be set within Local Nature Recovery Strategies, guided by national and regional targets for nature's recovery, so that they are locally appropriate.

However, responsible authorities will need to be better resourced to fulfil the roles required, with access to high-quality ecological and spatial data at the national and local level in order to spatially plan where and how new woodlands are created. The responsible authorities should include representation from a range of locally appropriate and well informed organisations, and should not just be local authorities.

Protecting Open Habitats

The England Tree Strategy must set out how high-value open habitats, and areas where these habitats could potentially be restored and connected, will be protected from inappropriate tree planting.

We welcome that the consultation recognises the value of high priority non-woodland habitats such as peat, and support plans to integrate the England Tree Strategy with the new England Peat Strategy. The ambition to restore over 20,000 hectares of afforested peatland to extend and buffer high quality blanket bog, lowland fen, or lowland raised peat bog[6] must be put into action. Peatland is a critical habitat, and action to restore peatlands must go further and faster in response to the climate and biodiversity crises[7]. In particular, shallow peats must be better protected from damaging land use activities.

However, protection of habitats must not be limited to their value to capture carbon – habitats such as chalk downland, semi-natural grassland, salt marsh, and heathland have extraordinary value for wildlife and play a large role in carbon capture too[8]. The consultation document proposes that 13,000 ha of degraded land could be made available for planting trees and in doing so fails to account for the value of open mosaic habitats on previously developed land for biodiversity, despite this habitat being recognised as a UK Biodiversity Priority Habitat[9]. Furthermore, open habitats within woodlands, such as glades, ponds, heathland, and scrub, often provide some of the most biodiverse habitats within woodlands and forests, particularly for rare and declining woodland butterflies such as the small pearl-bordered fritillary and the white admiral[10] and numerous other invertebrates, yet receive no attention within the England Tree Strategy consultation document.

[6] England Tree Strategy Consultation – Technical Annex https://consult.defra.gov.uk/forestry/england-tree-strategy/supporting_documents/englandtreestrategyconsultationtechnicalannex.pdf
[7] Response to Defra's England Peat Strategy Policy Discussion Document -The Wildlife Trusts https://wildlifetrusts.mangoapps.com/sf/25bbNyUgVPVX
[8] The Wildlife Trusts (2020) Let Nature Help: How nature's recovery is essential for tackling the climate crisis https://www.wildlifetrusts.org/sites/default/files/2020-06/Let%20Nature%20Help.pdf
[9] UK Biodiversity Action Plan Priority Habitat Descriptions: Open Mosaic Habitats on Previously Developed Land http://data.jncc.gov.uk/data/a81bf2a7-b637-4497-a8be-03bd50d4290d/UKBAP-BAPHabitats-40-OMH-2010.pdf
[10] Robertson, P. A., Clarke, S. A., & Warren, M. S. (1995). Woodland management and butterfly diversity. In Ecology and conservation of butterflies (pp. 113-122). Springer, Dordrecht.

The England Open Habitats Policy (2010)[11] states a target rate of conversion of woodland to open habitat of around 1,000 ha per year (which still maintains reasonable progress on woodland creation given the level of ambition for land-use change), however it is clear from the Forestry Commission's Key Performance Indicators report for 2019-2020[12] that the UK Government is falling far short of this target and has in fact overseen a decrease in open habitats over the past 2 years.

Without an appropriate strategic spatial approach to tree expansion in England which recognises the value of open habitats for nature, and comprehensive assessment of existing habitats to inform this approach, these habitats risk continuing to be lost in the drive to increase tree cover to deliver for carbon and timber.

It is therefore essential that high-value open habitats, and potential areas for these habitats to be restored, are mapped alongside areas suitable for woodland expansion in Local Nature Recovery Maps. Langley Vale Centenary Wood, a native woodland creation project at Epsom in Surrey, provides an example for how large areas of new woodland can be planted while protecting areas of endangered arable-associated higher plants and other priority open habitats.

Natural England's Priority Habitats Inventory should be updated and made fit for purpose to provide better data at the national and local level to inform this mapping and decision-making, and Natural England must be provided with sufficient budget and resources to do this. Where it exists, local detailed habitat mapping should be added to refine and update national mapping, and to make this locally appropriate and as up to date as possible.

The England Tree Strategy should set out a monitoring strategy and programme to ensure that delivery of new woodland expansion is of high quality, and to ensure that delivery of the intended targets is measured. Monitoring should be undertaken by independent assessment and publicly reported on annually, with responsible bodies held accountable for achieving targets set out within local strategies.

Addressing Barriers and Incentives for Tree Expansion

For trees and woodland to deliver multiple benefits for nature, people, and the climate, their role in supporting biodiversity, enhancing wellbeing, mitigating climate change, protecting our soils, and reducing the impacts of flooding must be fully recognised and adequately valued. Incentives and grants for woodland creation must recognise the value of continuous stands of native woodland for wildlife, people, flood prevention, and the climate[13], as well as valuing alternative woodland creation methods which deliver for biodiversity.

The Government must make available necessary funding and support to deliver the level of tree cover expansion needed. Financial support for new trees and woodlands should be made available through funding and delivery mechanisms that enable public goods to be delivered in return for public money, which ensure long-term delivery (30+ years) and provide ongoing support to land managers to manage high-value woodland habitats and more native trees and shrubs. The new Environmental Land Management (ELM) scheme can provide this delivery mechanism. Until ELM is operational, the current agri-environment scheme, Countryside Stewardship, should be improved by better incentivising land managers to create and maintain woodlands

[11] When to convert woods and forests to open habitat in England: Government policy https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/713805/england-open-habitats-policy-march-2010.pdf

[12] Forestry Commission Key Performance Indicators Report for 2019-20 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901578/Forestry-Commission-Key-Performance-Indicators-2019-20-.pdf

[13] Crane E. (2020) Woodlands for climate and nature: A review of woodland planting and management approaches in the UK for climate change mitigation and biodiversity conservation. Report to the RSPB. https://ww2.rspb.org.uk/Images/Forestry%20and%20climate%20change%20report%20Feb%202020_tcm9-478449.pdf

through simplified application processes and through increased incentives. In addition to this, the Nature for Climate Fund should support land managers to meet government targets on tree planting.

Areas of public funding and private finance should be blended to provide woodland owners with the full value of the public services and natural capital they provide, and to provide woodland managers with a regular financial return. Access to this funding needs to be transparent and simple, to reduce the barriers to woodland creation which have been present in previous woodland grant schemes.

Any measures to encourage private investment in establishing trees and woodland in England must not result in perverse incentives to plant trees on land which is not suitable (such as land which already has a high value to nature). It is crucial that government schemes for woodland creation do not try to provide a "one size fits all" blanket approach for incentivising woodland creation. The many values of trees and woodlands are place-based, as the value of the ecosystem services provided by them varies dependent on location. It is therefore imperative that new woodland creation is guided through local Nature Recovery Maps, and incentives for planting new areas of woodland must be allocated and valued within Local Nature Recovery Strategies to ensure the right tree is planted in the right place.

It is essential that incentives for new woodland creation support a range of woodland creation approaches, including natural regeneration of woodland habitats, direct seeding, and low-density planting schemes. The woodland habitats created through these means are more resilient, more biodiverse, and support woodland species which do not succeed in plantation woodlands. Work done by Cheshire Wildlife Trust has found that low density planting is far better for biodiversity than dense planting, especially so in upland settings where planting is predominantly focussed on semi-improved and unimproved acid grassland cloughs and gullies. A greater percentage of open space allows the grassland interest to persist and, alongside tree and scrub cover, provides excellent habitat for a wide range of invertebrates, which in turn support other species within these ecosystems.

Wooded habitats and assets such as traditional orchards, wood pasture, street trees, hedgerows, veteran trees, and scrub should also be recognised and valued as part of the diverse picture of our wooded heritage which has excellent value for wildlife and strong socio-cultural associations. The Strategy should make orchards susceptible to felling licenses, especially traditional and old orchards which have high biodiversity value.

Incentives for tree cover expansion must recognise and value the importance of connectivity of trees and woodlands within the wider landscape for biodiversity, resilience, and public access. Bonus payments should be made to land owners who create new areas of trees, hedges and woodland connected to existing woodland habitats to encourage connectivity, as well as those which collaborate with their neighbours to connect woodland habitats at a landscape scale as part of a Nature Recovery Network.

Current payment rates for woodland creation and management for farmers must be improved as they are far too low and often do not cover basic labour costs for woodland management, resulting in woodlands which are unmanaged and low in public value. Countryside Stewardship should be improved by better incentivising land managers to create and maintain woodlands through simplified application processes and through increased incentives. Without improving current woodland management rates, the ambitions for tree expansion in England over the next 5 years will not be realised.

In previous payment schemes, hedgerows have had a maximum width imposed on them. The England Tree Strategy should recognise the vital role hedgerows can play within a landscape, providing corridors of connectivity between woodlands and offering biodiversity refuges within farmed landscapes. Creation and restoration of hedgerows should be funded by ELMS, and there should be a minimum width which all hedgerows should meet to receive payments, with minimum standards for density, number of standard trees per length, diversity, and field edge buffers. Hedgerows should have a management plan to rotate cutting over

at least a 5 year period, to address the overcutting and lack of trees along hedgerows, to ensure a range of shrub heights, and to encourage fruit and seed bearing to give winter food for a range of birds and mammals.

Natural Regeneration of Woodland

Natural regeneration of woodland should be the preferred method for increasing tree cover where it is possible, augmented by the planting of locally native woodland species where necessary from nurseries of local-provenance stock, and should receive support through any incentive schemes to increase tree cover in England.

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. Wildlife Trusts across England have long used natural regeneration as the default mechanism to expand and connect existing areas of ancient semi-natural woodland and establish new areas of species-rich woodland.

To be successful, areas of natural regeneration must be strategically located connected to existing areas of high-quality native woodland habitat using Local Nature Recovery Maps. This provides areas of regeneration with the necessary seed banks and species assemblages required to develop diverse and resilient woodland habitats. It also allows the development of woodland ground flora and subterranean ecosystems which underpin woodland ecologies, and are absent it areas of planting. Brampton Wood is the second largest ancient woodland in Cambridgeshire, owned and managed by The Wildlife Trusts for Bedfordshire, Cambridgeshire & Northamptonshire. The entire wood was once clear felled and has since naturally regenerated. Now classed as a SSSI providing important woodland habitat to a range of native species, it provides clear evidence for the benefits and effectiveness of using natural regeneration to create new areas of woodland. New research[14] shows that carbon drawdown through natural woodland regeneration is also financially viable, providing a more profitable alternative to upland sheep farming.

Where woodland creation is not located connected to areas of native woodland or on sites with an existing seed source, planting should be of low density and high biodiversity to kick start the natural regeneration process, with planting material comprising locally native species from nurseries of local-provenance stock. This can have particular benefits within urban areas, where natural regeneration opportunities are more limited due to the fragmented nature of land and its multiple uses and ownership. Oak Hill Wood in East Barnett, London, is just one example where London Wildlife Trust has expanded existing woodland within an urban landscape utilising natural regeneration.

Alternative woodland creation approaches, such as natural regeneration, direct seeding, and low-density woodland planting, must receive support through woodland creation grants. Additionally, woodland succession habitats such as dense thorny scrub and woodland pasture should be recognised as key elements of the natural regeneration process and receive support through woodland management payments. Thorny scrub protects young saplings by providing a natural tree guard against damaging grazing activity[15] and provides important habitat for a number of key open-woodland species, increasing biodiversity within woodland ecosystems and the wider countryside, yet has long been penalised through land management

[14] Connie O'Neill et al 2020 Environ. Res. Lett. in press https://doi.org/10.1088/1748-9326/abaf87

[15] Harmer R., Kiewitt, A., Morgan, G. and Gill , R. (2010). Does the development of bramble (*Rubus fruticosus L. agg.*) facilitate the growth and establishment of tree seedlings in woodlands by reducing deer browsing damage? *Forestry Advance Access* doi:10.1093/forestry/cpp032

payment schemes such as the Basic Payment Scheme. Scrub must be recognised for the public goods and wildlife benefits it provides.

The recognition of the value of natural approaches to woodland creation within the consultation document is welcomed, however the England Tree Strategy must provide clear and smart targets for the proportion of new woodland intended to be created through natural approaches and set out how this method of woodland creation and management will be incentivised.

A critical element of successful natural regeneration of woodland habitats is the restoration of ecosystem services, and the reintroduction of key species which protect and enhance new woodland regeneration through the control of damaging grazing activity, seed dispersal, soil turnover, and opening up of the woodland canopy.

The consultation document acknowledges that the reintroduction of formerly native species such as pine marten and goshawk can play an important role in woodland creation. The Wildlife Trusts welcome this recognition, with Gloucestershire Wildlife Trust (working in partnership with Forestry England and Forest Research) leading the way in this area by coordinating Project Pine Marten, a project reintroducing this species to the Forest of Dean to restore critical ecosystem functions and predator-prey dynamics following a successful feasibility study and community consultation. Pine Marten have been found to predate on non-native grey squirrels significantly more than on red squirrels[16], showing that this type of management approach provides additional benefits for biodiversity and protection of endangered species.

Other native species such as beaver, wild boar, and bison can play a valuable role in restoring forest ecosystem processes, and should be considered for their value in creating dynamic woodland habitats. However, it is critically important that any species reintroductions are evidence-based and considered within the context of the entire ecosystem, rather than being considered only where they have the scope to increase tree planting success and commercial timber yield.

The results of the River Otter Beaver Trial, coordinated by Devon Wildlife Trust, have shown that the effect of beaver engineering and feeding on wetland and scrub woodland habitats has delivered significant ecological benefits, while showing no impact on commercial forestry plantations[17]. The Government's decision to give the beavers in the River Otter Beaver Trial the permanent right to remain is a landmark one, and the strategic reintroduction of beavers should now be considered across England to improve the ecological quality of many of our woodlands and wetlands. Wet woodland is a valuable habitat for biodiversity and for carbon storage in wet soils. The England Tree Strategy should recognise the regeneration of wet woodland in appropriate locations, where not destroying existing valuable marshland and reedbed habitats, as a viable option to extending woodland cover.

Kent Wildlife Trust have recently launched a flagship rewilding project, the Wilder Blean project, which aims to promote stronger habitats by restoring natural processes that are able to withstand the current environmental crisis and species decline, and in the long run, reverse it. European bison are being used in this project because they are ecosystem engineers, meaning that they are able to change their environment through their natural behaviours. Bison can change woodlands in a way that no other animal can; they eat bark and create dust baths which each have benefits for many plants and animals, functions that have been missing from our UK woodlands for thousands of years. Bringing them back can help restore an abundance of

[16] Twining, J. P., Montgomery, W. I., & Tosh, D. G. (2020) The dynamics of pine marten predation on red and grey squirrels. Mammalian Biology, 100:285–293 https://doi.org/10.1007/s42991-020-00031-z

[17] Brazier, R.E., Elliott, M., Andison, E., Auster, R.E., Bridgewater, S., Burgess, P., Chant, J., Graham, H., Knott, E., Puttock, A.K., Sansum, P., Vowles, A., (2020) River Otter Beaver Trial: Science and Evidence Report https://www.flipsnack.com/devonwildlifetrust/river-otter-beaver-trial-science-and-evidence-report.html

wildlife in England's woods and forests, and bring value and employment opportunities to rural communities through ecotourism.

Consultation Questions

The Wildlife Trusts' answers in ***bold***

6. Which actions would address the financial barriers that prevent the creation of new woodland? (select all that apply)

a) Consolidating the current range of woodland creation grants into one

b) Increasing the payment rates for incentives for woodland creation

c) Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply

d) Widening the eligibility criteria for the type of woodlands and tree planting that can be funded

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental land management Scheme

f) A quicker approval process for grant agreements

g) Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)

h) Introducing mechanisms that provide an annual cash flow in the woodlands' early years

i) Introducing mechanisms to realise a secure long-term cash flow for ecosystem services

j) Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation

k) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to derive an ongoing annual income from the land

l) Other - please specify in no more than 25 words

Public and private finance should be **blended** to provide woodland owners the full value of the public services they provide, and a regular financial return.

7. Which actions would be most effective in addressing the financial barriers that prevent the creation of new woodland? (select a up to three options)

a) Consolidating the current range of woodland creation grants into one

b) Increasing the payment rates for incentives for woodland creation

c) Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply

d) Widening the eligibility criteria for the type of woodlands and tree planting that can be funded

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental land management Scheme

f) A quicker approval process for grant agreements

g) Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)

h) Introducing mechanisms that provide an annual cash flow in the woodlands' early years

i) Introducing mechanisms to realise a secure long-term cash flow for ecosystem services

j) Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation

k) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to derive an ongoing annual income from the land

l) Other (if added, your own entry to question 6)

Public and private finance should be **blended** to provide woodland owners the full value of the public services they provide, and a regular financial return.

8. Woodlands provide a range of ecosystem services that provide benefits to businesses and society. How could government better encourage private investment in establishing trees and woodland creation? (Maximum 150 word response)

Incentives and grants for woodland creation must recognise the value of woodlands in supporting biodiversity, enhancing wellbeing, mitigating climate change, protecting our soils, and reducing the impacts of flooding. Public and private finance should be **blended** to provide woodland owners with the full value of the public services they provide, ensure **long-term delivery**, and **provide ongoing support** to land managers to create and manage high-value woodland habitats and more native trees.

Access to this funding needs to be transparent and simple, to reduce the barriers to woodland creation which have been present in previous and current woodland grant schemes. Measures to encourage private investment in establishing trees and woodland in England must not result in perverse incentives to plant trees on land which is not suitable (such as land with a high value to nature). It is therefore imperative that new woodland creation is guided through **Local Nature Recovery Maps.**

9. Which actions would address the non-financial barriers to the creation of new woodland? (select all that apply)

a) Consolidating the current range of woodland creation grants into one

b) Providing access to better information on the income streams well managed woodland can provide

c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills

d) Providing the investment community with access to expert advice on woodland creation and forestry knowledge and skills

e) Outreach to present the benefits of trees and forestry to land managers

f) Outreach to present the benefits of trees and forestry to the investment community

g) Outreach to present the benefits of trees and forestry to local communities

h) Changing policy so it does not treat afforestation as a permanent land use change

i) Increasing availability and access to contractors to plant and maintain the trees

j) Increasing availability of desired bio secure planting material

k) Educate and enthuse a new generation to expand the forestry industry

l) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land

m) Developing a supply of diverse and locally-appropriate seed and planting material by supporting community tree nurseries and other small nurseries that provide UK sourced and grown trees.

n) Providing best practice guidance on how best to achieve tree cover through natural establishment (e.g. most suitable locations, ground preparation, fencing requirements and decisions on management over time).

o) Other - please specify in no more than 25 words

Local Nature Recovery Strategies providing a strategic framework for establishing woodland in locations where it will most benefit nature, people, and the climate.

10. Which actions would be most effective in addressing the non-financial barriers to the creation of new woodland? (select up to three options)

a) Consolidating the current range of woodland creation grants into one

b) Providing access to better information on the income streams well managed woodland can provide

c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills

d) Providing the investment community with access to expert advice on woodland creation and forestry knowledge and skills

e) Outreach to present the benefits of trees and forestry to land managers

f) Outreach to present the benefits of trees and forestry to the investment community

g) Outreach to present the benefits of trees and forestry to local communities
h) Changing policy so it does not treat afforestation as a permanent land use change
i) Increasing availability and access to contractors to plant and maintain the trees
j) Increasing availability of desired bio secure planting material
k) Educate and enthuse a new generation to expand the forestry industry
l) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land
m) Developing a supply of diverse and locally-appropriate seed and planting material by supporting community tree nurseries and other small nurseries that provide UK sourced and grown trees.
n) Providing best practice guidance on how best to achieve tree cover through natural establishment (e.g. most suitable locations, ground preparation, fencing requirements and decisions on management over time)
o) Other (if added, your own entry to question 9)

Local Nature Recovery Strategies providing a strategic framework for establishing woodland in locations where it will most benefit nature, people, and the climate.

11. Which actions would address the regulatory barriers that prevent the creation of new woodland? (select all that apply)
a) Providing access to better guidance on how to meet the UK Forestry Standard
b) Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes
c) Enabling regulatory decisions by the Forestry Commission which reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in our 25 Year Environment Plan
d) Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes
e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme
f) Reduce the time and costs associated with Environmental Impact Assessment for afforestation
g) Other -please specify in no more than 25 words

Local Nature Recovery Strategies providing a strategic framework for establishing woodland in locations where it will most benefit nature, people, and the climate.

12. Which actions would be most effective in addressing the regulatory barriers that prevent the creation of new woodland? (select up to three options)
a) Providing access to better guidance on how to meet the UK Forestry Standard
b) Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes
c) Enabling regulatory decisions by the Forestry Commission which reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in our 25 Year Environment Plan
d) Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes
e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme
f) Reduce the time and costs associated with Environmental Impact Assessment for afforestation
g) Other (if added, your own entry to question 11)

Local Nature Recovery Strategies providing a strategic framework for establishing woodland in locations where it will most benefit nature, people, and the climate.

13. How can we most effectively support the natural establishment of trees and woodland in the landscape? (Maximum 100 words)

The England Tree Strategy must provide **clear and smart targets** for the proportion of new woodland created through natural approaches and **set out how this method of woodland creation can be incentivised**.

Areas of natural regeneration must be strategically located connected to existing areas of high-quality native woodland habitat through **Local Nature Recovery Mapping**.

Woodland-succession habitats, such as dense scrubland and woodland pasture, must be **recognised as key elements of the natural regeneration process and receive support through woodland creation grants**.

It is critically important that **any species reintroductions are evidence-based and considered within the context of the entire ecosystem**.

14. Are there any other actions - beyond the options you have already selected or submitted - that would help land owners and managers to transform the level of woodland creation and increase the number of non-woodland trees in England? (Maximum 150 words)

It is essential that **incentives for new woodland creation support a range of woodland creation approaches**, including natural regeneration of woodland habitats and low-density planting schemes. The woodland habitats created through these means are more resilient, more biodiverse, and support woodland species which do not succeed in plantation woodlands. Work done by Cheshire Wildlife Trust has found that low density planting in upland settings where planting is predominantly focussed on semi-improved and unimproved acid grassland cloughs and gullies leads to a greater percentage of open space and provides excellent habitat for a wide range of invertebrates, which in turn support species higher up the food chain.

Wooded habitats such as traditional orchards, wood pasture, hedgerows, and scrub, as well as street trees and veteran trees, should be recognised and valued as part of the diverse picture of our wooded heritage which has excellent value for wildlife and strong socio-cultural associations.

15. Which of the following actions would be most effective in helping expand woodland creation in locations which deliver water, flood risk benefits and nature recovery? (select up to three options)

a) Widening the eligibility criteria for woodland creation grants so more applicants can apply and more forms of woodland are eligible

b) Widening the eligibility criteria for woodland creation grants so more sizes of woodland are eligible

c) Increasing grant payments for tree planting along water courses, steep sided slopes and difficult sites

d) Quicker approval process for grant agreements

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Implementing a joint approach to land management across government, including authorities responsible for protected landscapes

g) Providing better access to advice and guidance on woodland creation, forestry expertise and training

h) Other - please specify in no more than 25 words

Tree planting guided through **Local Nature Recovery Strategies** which integrate water priorities, opportunities, and data into their development and delivery, with support of Catchment Partnerships.

16. What role could the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover? (Maximum 150 word response)

Our National Parks and Areas of Outstanding Natural Beauty need to be much wilder. The Wildlife Trusts believe that England's National Parks and AONBs have failed in their statutory duty to enhance wildlife.

These designated landscapes must embrace the opportunity to demonstrate and evidence new ways to enhance habitats, including **continuous stands of native woodland**. The statutory purposes need to be strengthened to ensure **greater priority is given to enhancing and restoring wildlife** and reversing the significant decline in biodiversity.

Targeted action will make the best use of resources, ensuring that action for nature is carried out where it will be most effective. Nature Recovery Network Mapping should guide the restoration and creation of new areas of woodland within and adjacent to National Parks and AONBs to enable a connected landscape, and ensure essential habitat connectivity to the wider countryside.

See The Wildlife Trusts' response to the Glover Review.

Protecting and Improving our Woodlands

While new trees and woodlands are needed to address the nature and climate emergencies, the UK's existing woodland habitats must be better protected and managed for nature first. The England Tree Strategy must set out how existing trees and woodlands will be better protected from damaging activities, better managed to deliver public goods, and how habitats damaged by previous inappropriate tree planting be restored.

Protecting our Trees and Woodlands

As well as expanding UK tree cover, existing trees and woodland habitats must be improved for nature, better connected, and better protected. Wooded habitats such as wood pasture, orchards, parklands, and veteran and mature trees must be recognised and protected, and resources made available to manage these sensitively and to monitor their condition. Increasing the size of existing woodlands through establishing buffers where natural regeneration can take place would be a key mechanism to protecting existing woodlands.

Protection from run-off, pollution, and contamination is also important to secure good condition and prevent degradation, especially around the woodland boundaries where edge impacts affect woodlands and trees, whether from rural run-off or urbanisation and development, compaction of roots, dumping of garden rubbish, or direct felling.

Restoration of 'Plantations on Ancient Woodland Sites' (PAWS) should be a priority to re-establish areas of biodiversity-rich ancient woodland. This has long been an aim of Government policy, but the level of restoration has been far below that needed for these habitats to recover. The Wildlife Trusts believe the England Tree Strategy must include an ambitious target for the restoration of PAWS sites.

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. The value of trees as critical elements of green infrastructure must be recognised and the benefits they provide better factored in to economic decisions that may affect them. Sheffield & Rotherham Wildlife Trust have worked closely with a number of key local stakeholders in the development of the Sheffield Street Tree Partnership. This sets out a working strategy which recognises the essential contribution that street trees provide for health and wellbeing, air quality and other ecological and environmental benefits, as well as outlining new ways of working to ensure the city's network of street trees is well maintained and sustained for the future.

Enough resources must be made available for managers to effectively manage, monitor and enhance the stock under their responsibility. The Government's Environmental Bill should set out compulsory requirements for Local Authorities to develop Local Nature Recovery Strategies and provide adequate funding to develop these strategies in partnership with key stakeholders.

The UK Forestry Standard (UKFS) is currently under-regulated, and often only monitored through applications for felling licenses, grants, or EIAs; even then it may only be desk-based exercise. The England Tree Strategy should commit to a better resourced and regulated UKFS with accredited site visits to assess implementation of plans, progress toward intended outputs, and compliance with legal obligations. Proportionate enforcement and advice will be crucial to achieving the England Tree Strategy's aims.

Managing Woods for Nature's Recovery

The England Tree Strategy does not set out a clear definition of what is meant by "woodland management", with the worrying assertion that this must include the abstraction of timber as a resource. Woodland management should be defined as any management decision or process which contributes to a woodland moving towards a desired endpoint, as set out by a woodland management plan. In some situations, such as

in a naturalised woodland which illustrates a complete range of natural processes, "good" woodland management would result in little to no intervention practices.

The England Tree Strategy should set a clear definition for what is considered management of woodland. Currently, there is no real consistency or strategic objectives which managers aim to work to. Projects such as the Great North Wood project, led by London Wildlife Trust, have aimed to address this, with this project developing consistent management briefs for 13 sites with different owners, but which share the same ecological history.

The latest figures from the Forestry Commission show that only 7% of native woodland area is in favourable condition, with the greatest contributing factor to this being historic management of woodlands[18]. The Wildlife Trusts would expect the England Tree Strategy to set an ambitious target for improving the proportion of existing woodland in favourable ecological condition as a priority of the Strategy. The England nation's forests must be managed as a vision of what sustainable, wildlife friendly forestry can achieve.

Trees and woodlands in the UK must not be managed for carbon storage at the expense of biodiversity. 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, woodland pasture, trees within open landscapes, and successional woodland, including thorny scrub). Open habitats within woodlands, such as glades, ponds, heathland, and scrub, often provide some of the most biodiverse habitats within woodlands and forests.

Incentive payments for woodland management should have clear aims, outcomes, and measurable targets for improving biodiversity, against which the results can be measured and demonstrate whether the management is providing value for money. Incentives for woodland management which focus on maximising carbon capture or timber output at the expense of increased biodiversity and ecosystem services would be a disaster for ambitions to address the dual climate and ecological crises, and meet the Government's targets set out in their 25 year plan for the environment 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.

Plant Biosecurity

Pests and diseases which impact tree health present a serious barrier to delivering ambitious woodland expansion targets in England and the UK. Ash dieback *Hymenoscyphus fraxineus* is a single example of a non-native disease which could wipe out 95% of the UK's ash trees, one of the most common species in our landscape. The resultant impact on our woodlands and wider countryside would be significant, both in terms of the impact on ecological systems and the impact on tree and woodland cover in the UK. The England Tree Strategy must ensure a net increase in tree and woodland cover in England, with any restocking of trees lost to disease additional to any targets set out within the Strategy.

Where possible, natural regeneration of woodland should be favoured over planting, which removes the risk of transporting invasive alien pests and diseases from nurseries or through foreign import channels. Natural regeneration also results in the creation of woodland habitats with a dynamic age-structure, genetic variation, and associated ecologies (*e.g.* symbiotic organisms, predator-prey dynamics, mycorrhizal relationships) where

[18] NFI Woodland Ecological Condition, Forest Research https://www.forestresearch.gov.uk/tools-and-resources/national-forest-inventory/what-our-woodlands-and-tree-cover-outside-woodlands-are-like-today-8211-nfi-inventory-reports-and-woodland-map-reports/nfi-woodland-ecological-condition/

trees which grow to maturity will be best suited to their local micro-climatic conditions, such as soil type, water availability, and sunlight, making them more resilient to external pest and disease threats.

Where natural regeneration is not appropriate, or requires supplementary tree planting, any planting material must be sourced and grown within the UK and be of locally native species and local provenance. There must be strict biosecurity standards and monitoring over the procurement of resources for tree planting practices. Any planting of trees must follow procedures in place to ensure that material is thoroughly assessed for the potential to transfer invasive non-native species and tree pests and diseases.

To deliver on the scale needed for the ambition set out in the Tree Strategy will require a significant investment in the UK tree nursery sector. To support this, the England Tree Strategy should set out how the Government will support tree nurseries in England to provide the planting material required to deliver on the Government's tree planting commitments.

Existing tree health grants for felling and restocking diseased trees have been found wholly insufficient to meet the demands faced by land managers managing tree diseases such as ash dieback. These tree health grants need to be reviewed so that they adequately fund land managers to manage the risks associated with tree disease, and should support a wider range of restocking approaches, such as natural regeneration and low-density planting. These approaches should be trialled within the upcoming Tree Health Pilot financial assistance scheme being launched in 2021.

Managing Deer and Squirrels

For new areas of woodland to establish in the UK, whether through planting or via natural regeneration, it is clear that the issues presented by excessively large populations of species which browse young saplings such as muntjac deer (which cause damage to woodland understorey and are listed as a top IAS) and those which strip bark such as grey squirrel, will need to be addressed. To be successful, any programme which looks to reduce the damage to trees and woodlands caused by deer and squirrels must be strategically managed across the UK at a landscape scale.

The Wildlife Trusts would like to see woodland management principles embrace practices which take a naturalistic approach to the control of browsing species, and which also improve biodiversity and deliver multiple benefits for wildlife and people. Therefore, we support the proposals for the local reintroduction of native species to control the numbers of squirrel and deer, such as pine marten and goshawk. Pine Marten in particular have been found to predate on non-native grey squirrels significantly more than on red squirrels[19], showing that this type of management approach provides multiple benefits for biodiversity and protection of endangered species. Gloucestershire Wildlife Trust's Project Pine Marten is exploring how this species can restore critical ecosystem functions and predator-prey dynamics in the Forest of Dean, following a successful feasibility study and community consultation.

The Wildlife Trusts would like to see greater ambition to reintroduce the lynx to manage deer in appropriate locations where they can have a beneficial effect on woodland diversity and resilience. The reintroduction of iconic and charismatic species such as pine marten and lynx will also deliver benefits to local ecotourism, restore key ecosystem services, and help to deliver on the government's biodiversity targets[20].

However, it is essential that any reintroductions of native species are considered holistically within the ecological landscape and undergo a strict environmental assessment protocol. It is critically important that any species reintroductions are evidence-based and considered within the context of the entire ecosystem,

[19] Twining, J. P., Montgomery, W. I., & Tosh, D. G. (2020) The dynamics of pine marten predation on red and grey squirrels. Mammalian Biology, 100:285–293 https://doi.org/10.1007/s42991-020-00031-z

[20] White, C., Convery, I., Eagle, A., O'Donoghue, P., Piper, S., Rowcroft, P., Smith, D., & van Maanen, E. (2015) Cost-benefit analysis for the reintroduction of lynx to the UK: Main report. Application for the reintroduction of Lynx to the UK government, AECOM.

rather than being considered only where they have the scope to increase tree planting success and commercial timber yield.

Trees and Woodlands in the Planning System

Housing developments designed with environmental sensitivity and green infrastructure at their heart can deliver multiple social, environmental and economic benefits. Nature rich housing can provide benefits for everyone - from developers to home-owners.

The Wildlife Trusts have set out a vision for Homes for People and Wildlife, which sets out how to build housing in a nature-friendly way and sees trees, hedgerows, water and other habitats integrated with new development with street trees for wildlife, shade and improved air quality. There are also a range of locally developed benchmarks and toolkits for green infrastructure. Gloucestershire Wildlife Trust has developed the Building with Nature standard, which is the UK's first green infrastructure benchmark for high quality places for people and wildlife. Building with Nature provides a framework of quality standards, an assessment and accreditation service, and national awards recognising the design and delivery of high-quality green infrastructure. The aim is to ensure new developments will deliver for the natural world and healthy communities, allowing people to live closer to nature.

The England Tree Strategy needs to align with the National Planning Policy Framework to ensure policy coherence in this area. New developments and infrastructure must prioritise avoiding damage to trees and woodlands in the first place, and incorporate existing trees into the design phase of the project. Any compensation and net gain should be informed by a Local Nature Recovery Strategy and Nature Recovery Network map, with any planting using locally native trees of local provenance and in keeping with the surrounding natural habitat. Any loss of habitat through development should be replaced like for like, and must avoid planting trees on existing areas of high value priority habitat to avoid an overall loss in biodiversity.

The England Tree Strategy must set out a process to update the Ancient Woodland Inventory, expand this to include smaller patches of ancient woodland and individual veteran trees, and ensure that this inventory is properly consulted prior to any planned development. Smithy Wood is one example of a designated site on Natural England's Ancient Woodland Inventory which is at risk of development to a major motorway service area. Without strong campaign action from Sheffield and Rotherham Wildlife Trust, this irreplaceable 850-year-old 15-hectare site would likely have already been felled and the benefits for nature, local residents, and the climate lost forever.

Woodlands in a Changing Climate

The Wildlife Trusts do not see the planting of non-native woodland species within native forests as a solution to tackling the climate crisis, and are concerned that suggestions to introduce species from southern latitudes to UK woodlands to improve their resilience significantly risks compromising national and local biodiversity and importing invasive non-native pests and diseases.

The Wildlife Trusts believe that trees and woodlands in the UK should not be adulterated to suit an anthropocentric future, but that we must change our actions now to limit global warming to ensure that our native woodlands and wildlife are better able to sustain themselves into the future. By protecting, expanding, and connecting our areas of native woodland through a Nature Recovery Network, we better enable the transfer of existing genetic diversity within woodland species' populations in the UK and allow these habitats to adapt and be resilient to a changing climate.

As well as enabling more resilient trees and woods, it is vitally important that the Government acts to prevent damaging global temperature rises and a climate crisis. The UK has a target of net zero greenhouse gas emissions by 2050, and nature can make a massive contribution to achieving this, or an even more ambitious target – but only if we restore our damaged ecosystems. We urgently need to protect important ecosystems so their carbon isn't released, and they can continue to absorb CO_2. We also need to put nature into recovery

across a third of land and sea, so the natural world can cope with the climate change that is already happening and contribute effectively to stabilising it. The Wildlife Trusts are involved in projects to restore and connect habitats across the country as part of a Nature Recovery Network, from re-wetting peatland to creating saltmarsh and planting seagrass. Our recent publication Let Nature Help sets out several examples of how the Wildlife Trusts are taking action to bring nature back across to fight the climate crisis.

Consultation Questions

17. Which actions would be most effective to increase protection for trees and woodland from unsustainable management? (select up to three options)

a) Introducing measures to support compliance with the UK Forestry Standard

b) More effective information sharing between government departments and their delivery bodies to inform decisions impacting on woodland, including to prevent woodland loss

c) Introducing clearer processes for licencing tree felling, with felling licences that can be suspended, withdrawn or superseded

d) Greater penalties for non-compliance with the requirements of the Forestry Act

e) Powers to set wider felling licence conditions, for example to enable enforcement of compliance with the UK Forestry Standard

f) A clearer policy presumption that all trees felled without a licence will be replaced (except in exceptional circumstances)

g) Refining the process of making Tree Preservation Orders, and clarifying the criteria to improve consistency in application of the policy across local authorities

h) Other - please specify in no more than 25 words

18. Which actions would best help the planning system support better protection and enhancement of the ancient and wider woodland environment and trees? (select up to two options)

a) Providing support to fully complete revision of the Ancient Woodland Inventory (to include ancient woodlands under two hectares in area)

b) Commissioning research into effective size and use of buffer zones around woodland for different impacts

c) Providing better monitoring and recording of decisions on planning applications affecting ancient woodland

d) Sharing best practice guidance and training to support implementation of National Planning Policy Framework policy on ancient woodland with local authority planners

e) Encouraging more woodland to be brought into management where impacted by development

f) More effective information sharing between agencies and local planning authorities to inform decision making impacting on woodland including to prevent woodland loss

g) Refining the process of making Tree Preservation Orders, and clarifying the criteria to improve consistency in application of the policy across local authorities.

h) Other - please specify in no more than 25 words

New development must prioritise avoiding damage to trees and woodlands and incorporate existing trees into the design phase, informed by a Local Nature Recovery Strategy.

19. What actions would be most effective in reducing the use of plastics in forestry? (select one option)

a) Providing support to land managers for deer control and fencing

b) Supporting further testing and trial of non-plastic alternatives such as tree guards

c) Introducing stronger control on the recovery and disposal of plastics in grant agreements and public sector contracts for woodland creation and management

d) Promoting the use of non-plastic tree guards

e) Other (please specify in no more than 25 words)

Embracing natural processes, such as thorny scrub habitat as a replacement for plastic tree guards and reintroduction of native predators to manage damaging grazing species.

20. Which actions would overcome financial barriers to woodland management? (select all that apply)

a) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

b) Providing grant support for a wider range of management activities

c) Providing grant support for the restoration of Plantations on Ancient Woodlands Sites (PAWS)

d) Providing support for woodland infrastructure such as roading

e) Providing grants or loans for equipment, for example, harvesters

f) Support to increase the productivity/supply chains for woodland products

g) Support for land owner collaboration in woodland management

h) Government requiring more domestic timber through procurement policies

i) Other - please specify in no more than 25 words

Incentives to increase management of woodlands which recognise and value the wide range of ecosystem services provided by different woodland and non-woodland habitats

21. Which actions would be most effective at overcoming the financial barriers to woodland management? (select up to three options)

a) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

b) Providing grant support for a wider range of management activities

c) Providing grant support for the restoration of Plantations on Ancient Woodlands Sites (PAWS)

d) Providing support for woodland infrastructure such as roading

e) Providing grants or loans for equipment, for example, harvesters

f) Support to increase the productivity/supply chains for woodland products

g) Support for land owner collaboration in woodland management

h) Government requiring more domestic timber through procurement policies

i) Other - please specify in no more than 25 words

Incentives to increase management of woodlands which recognise and value the wide range of ecosystem services provided by different woodland and non-woodland habitats

22. Which actions would address the non-financial barriers to woodland management? (select all that apply)

a) Providing user friendly woodland management services aimed at 'non forester' woodland owners

b) Ensuring public recognition of woodlands that are managed sustainably (for example, like Green Flag awards)

c) Providing better communication of the benefits and need for woodland management with land managers and investors

d) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

e) Training to increase the forestry skills capacity in agricultural workers

f) Other - please specify in no more than 25 words

The England Tree Strategy must set milestone targets for the proportion of existing woodland in "good ecological condition", with a reporting requirement to monitor progress.

23. Which actions would be most effective at overcoming the non-financial barriers to woodland management? (select a maximum of three options)

a) Providing user friendly woodland management services aimed at 'non forester' woodland owners

b) Ensuring public recognition of woodlands that are managed sustainably (for example like Green Flag awards)

c) Providing better communication of the benefits and need for woodland management with land managers and investors

d) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

e) Training to increase the forestry skills capacity in agricultural workers

f) Other (if added, your own entry to question 21)

The England Tree Strategy must set milestone targets for the proportion of existing woodland in "good ecological condition", with a reporting requirement to monitor progress.

24. Which actions would overcome the regulatory barriers to woodland management? (select all that apply)

a) Streamlining delivery of current regulations (for example, self-service felling licences for tree felling proposals that would not reduce woodland cover)

b) Placing responsibility for complying with woodland regulation on the woodland manager rather than the woodland owner

c) Placing a legal obligation on all land owners to manage their woodland

d) Other - please specify in no more than 25 words

The England Tree Strategy should set a clear definition for what is considered management of woodland, including management of naturalised woodlands.

25. Which actions would be most effective at overcoming the regulatory barriers to woodland management? (select one option)

a) Streamlining delivery of current regulations (for example, self-service felling licences for tree felling proposals that would not reduce woodland cover)

b) Placing responsibility for complying with woodland regulation on the woodland manager rather than the woodland owner

c) Placing a legal obligation on all land owners to manage their woodland

d) Other (if added, your own entry to question 23)

26. If you own and/or manage woodland(s) that is a Site of Special Scientific Interest (SSSI) what actions would help you most to bring that woodland(s) into management? (Maximum 100 word response)

The England Tree Strategy should provide good advice, clear guidelines, and financial support for non-conventional management options that protect wildlife, such as dormice boxes, or the specific management of collections of high-value trees, for example groups of ancient coppice or pollards.

The Strategy needs to recognise a more flexible attitude to mosaic habitats, where small areas of woodlands are managed alongside grassland, wetland, and heath, as well as support for removing trees for the purpose of disease control and woodland protection where proportionate and sensitive to the biodiversity interests of the site.

27. Which of the following actions would be most effective in improving plant biosecurity across England's trees and woodlands? (pick up to two options)

a) Increasing the number of nurseries that meet the 'Plant healthy' management standard

b) Providing better best practice guidance and information about biosecurity

c) Introducing conditions which require suppliers to meet the "Plant Healthy' management standard for those public sector contracts and government grants that relate to tree planting and restocking

d) Amending planning policy to encourage local planning authorities to source trees from suppliers who meet the 'Plant healthy' management standard

e) Sharing the Forestry England's experience and case studies

f) Managing the impact of invasive non-native plants which provide a pathway for disease through targeted action, ongoing management and monitoring, and wider education

g) Developing a supply of diverse and locally-appropriate seed and planting material by supporting community tree nurseries and other small nurseries that provide UK sourced and grown trees

h) Other - please specify in no more than 25 words

Encourage natural regeneration of woodland habitats, developing complex ecosystems which are best adapted to their local micro-climatic conditions making them more resilient to external threats.

28. Which of the following actions are or would be most appropriate for England's trees and woodlands to contribute to climate change mitigation and helping to achieve net zero? (pick up to three options)

a) Bringing woods into management to enhance their future resilience to climate change and secure greenhouse gas emissions reduction in other sectors through wood replacing 'carbon intensive' materials (acknowledging that this will lead to a short to medium reduction on carbon stored in the woodland)

b) Planting UKFS-compliant productive forests to provide a strong carbon sink over the coming decades and then a source of sustainable timber to meet the needs of future generations

c) Planting predominantly native woodland to act as a long term store of carbon

d) Establishing 'energy forest' plantations (short rotation coppice and short rotation forestry) to satisfy future biomass demand for bioenergy with carbon capture and storage

e) Encouraging agroforestry to increase the amount of carbon stored on productive farmland

f) Strengthening the protection of all woodland to reduce greenhouse gas emissions from deforestation

29. Which of these actions would be most effective in reducing damage to trees and woodlands caused by deer? (select up to two options)

a) Develop a national policy on sustainable deer management and control measures

b) Facilitate landscape scale control by land managers

c) Deer control as a requirement of grant or felling agreements

d) Incentives for the management of deer

e) Supporting a range of approaches to tree protection, including fencing and other alternatives to plastic tree guards

f) Better advice and guidance on the value of and options to control damage by deer

g) Other - please specify in no more than 25 words

30. Which of these actions would be most effective in reducing the damage to trees and woodlands caused by grey squirrels? (select up to two options)

a) Making grey squirrel control a requirement of grant or felling agreements

b) Providing incentives for the management of grey squirrel

c) Researching contraception to prevent breeding

d) Reintroducing animals to help control squirrels, such as pine martens and goshawks

e) Providing better advice and guidance on grey squirrel control

f) Other - please specify in no more than 25 words

Engaging People with Trees and Woodland

The Wildlife Trust have a vision of a thriving, wildlife-rich environment which benefits our physical and mental health. People with nature and green spaces on their doorstep are more active, mentally resilient, and have better all-round health. We want to ensure that every person has the opportunity to experience wildlife in their daily lives, and in the current context of a nation recovering from a global pandemic, there has never been a more crucial time to ensure that everyone has equal access to nature near where they live.

Woodlands for People

New areas of woodland expansion need to be close to where people live to deliver the many values of trees and woods to the people who need them most. The report *Health Equity in England: The Marmot Review 10 Years On*[21] reveals that access to nature is still worse for people in deprived areas & those with higher proportions of minority ethnic groups, and recommends creating access to good-quality green space in the most deprived communities will lead to improvements in physical and mental health. Creating new woodlands and Community Forests close to these communities through local Nature Recovery Networks will ensure that woods are connected with people who need them most, providing these communities with opportunities to exercise, learn, and engage with nature on their doorstep.

A literature review for The Wildlife Trusts conducted by the University of Essex has shown that this provides multiple benefits for physical health and psychological and social wellbeing[22]. Projects such as MyPlace, an exciting and innovative ecotherapy project delivered by the Wildlife Trust for Lancashire, Manchester and North Merseyside in partnership with the Lancashire and South Cumbria NHS Foundation Trust, shows how engaging people with nature can empower people and their communities to connect with local environments and learn new skills, build resilience, meet new people and improve their physical health and mental wellbeing[23].

A recent report of public opinion on the role and importance of nature in our recovery from the Coronavirus crisis found that 84% of people in England support the suggestion that Government should increase the number of accessible nature-rich areas in the UK[24]. Covid-19 has exposed woodlands to whole new audiences, and the England Tree strategy must recognise the need to support new ways of engaging people in woodlands.

Public interest in woodland expansion should be reflected by access to information, and a comprehensive system of timely monitoring and evaluation. There should be opportunities for consultation, and mechanisms for input into and feedback from new woodland proposals, to ensure the buy-in of local communities. Principles of community forestry should be at the forefront of woodland expansion near people.

There is currently no formal route for accreditation or qualification of social intervention work carried out by the environmental NGO sector in woods, such as ecotherapy programmes. An accredited route for social intervention programmes would provide them with more credibility within the medical sector and the people

[21] Marmot, M., Allen, J., Boyce, T., Goldblatt, P., & Morrison, J. (2020) Health equity in England: The Marmot Review 10 years on. London: Institute of Health Equity

[22] Bragg, D., Wood, C., Barton, J., & Pretty, J. (2018) Wellbeing benefits from natural environments rich in wildlife. A literature review for The Wildlife Trusts by the University of Essex https://www.wildlifetrusts.org/sites/default/files/2018-05/r1_literature_review_wellbeing_benefits_of_wild_places_lres.pdf

[23] MyPlace: An Independent Review (2019) https://www.lancswt.org.uk/sites/default/files/2019-12/An%20Independant%20Evaluation%20Review%20of%20Myplace%20October%202019.pdf

[24] Recovering Together: A report of public opinion on the role and importance of nature during and in our recovery from the Coronavirus crisis in England (2020) RSPB https://www.rspb.org.uk/globalassets/downloads/recovering-together-report/recovering-together-report_nature-and-green-recovery_rspbyougov_june-2020.pdf

who could benefit from them. These types of programmes have already been shown to provide real improvements for peoples' health and wellbeing at excellent value for money[25].

Woodlands for the Future

Fundamental to invoking an interest and care for the trees, woodlands and forests (being planted today for the future) is recognising the importance of engaging young people to connect with and learn about trees, woods and forests, their creation and management. Research has revealed that children's wellbeing increases when they spend time connecting with nature: the children showed an increase in their personal wellbeing and health over time, and they showed an increase in nature connection, pro-environmental values and demonstrated high levels of enjoyment[26].

The mid-term evaluation of the Our Bright Future programme has shown that being outside engaging with nature have improved young people's personal development, particularly for disadvantaged young people[27]. The programme has seen an increase in participants' self-confidence, wellbeing and mental health, as well as improvements in attitude and motivation to learn. At school and in college, teachers have witnessed marked improvements in young people's behaviour, social interactions, anxiety levels and emotional self-control.

This as a key area of the England Tree Strategy that needs strengthening with more emphasis on the different ways to engage; formal and informal, through learning, play and practical hands-on opportunities throughout an individual's learning journey and skill progression, and into adulthood, including the role of teachers, carers and wider business, educational and community networks.

There needs to be more incentives for creating Community Woodlands and opening up a greater range of woodlands and related woodland businesses, as settings for learning. This includes improving the quality of access and appropriate infrastructure that may be needed, depending on the types of groups that need access. There needs to be more advice and collaboration, possibly with incentives, for landowners to work with local organisations and groups. The community forests have largely been successful and creative in involving local communities and we feel more of these 'larger landscape' initiatives need to be set up to support local communities – working in partnership with specific communities and their needs. The following aspects would be useful for consideration:

- Recognising and supporting opportunities for families and communities to engage together through community events and access opportunities.
- Formal curriculum inclusion of the local management and creation of woodlands and forests in the UK, especially making links to the diverse nature of British Woodland management, the tree and timber cycle, contribution to the sustainability, climate and ecological emergencies, and the many different organisations involved.
- Ensuring that woodland enterprises, forestry activity and all the various careers associated with it, are included within career advice for young people and pathways identified and promoted as routes into the sector.
- Support for the development of practical skills and training aimed at the wider sector, and accreditation and qualification routes are promoted from younger ages with accredited learning opportunities/courses (*i.e.* Forest school/Outdoor learning qualifications into post 16 education).

[25] Social Return on Investment analysis of the health and wellbeing impacts of Wildlife Trust programmes https://www.wildlifetrusts.org/sites/default/files/2019-09/SROI%20Report%20FINAL%20-%20DIGITAL.pdf

[26] Sheldrake R., Amos R., J. Reiss M., (UCL Institute of Education), Children and Nature, A Research Evaluation for The Wildlife Trusts, 2019 https://www.wildlifetrusts.org/sites/default/files/2019-11/Children%20and%20Nature%20-%20UCL%20and%20The%20Wildlife%20Trusts%20Full%20Report.pdf

[27] Hudson H., Smith M., White O., Vittle K., Haswell-Walls F., Cotton I., (2019) Our Bright Future, Mid-term evaluation http://www.ourbrightfuture.co.uk/wp-content/uploads/2019/08/Mid-Term-Evaluation-Final-Report.pdf

Again, these should include skills for forest education and social forestry. See https://careersinforestry.org.uk/

Funding to support school engagement through:

- All new school builds including a tree'd outdoor area
- The provision of a six-week (minimum) entitlement to an outdoor learning experience (for example Forest School) for all primary aged children in England.

Urban Trees and Forests

Urban tree-planting can demonstrate benefits for climate proofing, landscape enhancements, and community cohesion as well as enhancing biodiversity and improving wellbeing. Greener neighbourhoods have been shown to prevent depression and other mental illnesses[28], and a review of evidence by the World Health Organisation has shown that urban green space has health benefits, particularly for economically deprived communities, children, and senior citizens[29].

The values of urban trees and woodlands for people should be recognised within Local Nature Recovery Plans which recognise their role as key elements of green infrastructure. These plans should set out Local Nature Recovery Maps which identify areas where new planting will most benefit people and wildlife, and allow for a national Nature Recovery Network to extend deep into our cities and towns.

Inequalities in access to woodlands between high and low-income households, between different communities and demographics, and between people in urban and rural areas, should be addressed by creating mechanisms where "Community Champions" for trees and forests from within the areas that face inequality and poor environments are included within local decision-making processes, such as within Local Nature Recovery Strategies.

Sheffield & Rotherham Wildlife Trust have worked closely with a number of key local stakeholders in the development of the Sheffield Street Tree Partnership. This sets out a working strategy which recognises the essential contribution that street trees provide for health and wellbeing, air quality and other ecological and environmental benefits, as well as outlining new ways of working to ensure the city's network of street trees is well maintained and sustained for the future.

Consultation Questions

31. Are any of the following significant barriers to securing and maintaining street trees? (select up to three options)

a) Appropriate standards and guidance for securing the right trees in the right places

b) Practical challenges in terms of street design, planting requirements and compatibility with other infrastructure provision

c) The adoption of street trees by local highway authorities, or alternative arrangements where streets are not adopted

d) The skills and resources needed to deliver new street trees, including funding for planting

e) The funding and skills for ongoing maintenance of street trees over their lifetime

f) Other – please specify in no more than 100 words

Urban trees and woodlands should be considered as **green infrastructure**, which should be considered on same level of priority as other forms of infrastructure recognising the multiple benefits to nature, people, and ecosystem services that green infrastructure can provide.

[28] Sarkar, C., Webster, C., & Gallacher, J. (2018). Residential greenness and prevalence of major depressive disorders: a cross-sectional, observational, associational study of 94 879 adult UK Biobank participants. The Lancet Planetary Health, 2(4), e162-e173.
[29] Urban green spaces and health (2016) Copenhagen: WHO Regional Office for Europe https://www.euro.who.int/en/health-topics/environment-and-health/urban-health/publications/2016/urban-green-spaces-and-health-a-review-of-evidence-2016

32. How could government overcome the barriers to securing and maintaining street trees you have identified in question 31? (Maximum 150 word response)

The National Planning Policy Framework should be strengthened to bring green infrastructure up to the same level of importance and protection as other infrastructure.

Local authorities need to be adequately funded so they have the required resources to establish urban trees and woods, to recruit qualified staff, to develop Local Nature Recovery Strategies, and to plant and care for street trees.

Tree Protection Orders should be strengthened, with increased fines for developers who contravene them.

33. Which of these actions would be most effective in increasing the number/coverage of trees in and around urban areas? (rank the following options in order of preference)

1. *g) Other - please specify in no more than 25 words*

Local Nature Recovery Strategies provide a strategic framework for establishing woodland in locations where it will most benefit nature, people, and the climate.

2. *a) Promotion through national policy (including England Tree Strategy and national planning policy) including recognition that trees and woodlands are key components of green infrastructure, with equal status to other green and built infrastructure*

3. *c) Development and implementation of Local Tree and Woodland Strategies and local planning policies - setting local targets for tree canopy cover and recognition that trees and woodlands are key components of green infrastructure, with equal status to other green and built infrastructure*

4. *b) Promotion through national guidance (such as green infrastructure, planning and design, and code/street guidance, e.g., Manual for Streets) - stronger inclusion of appropriate engineering solutions*

5. *e) Providing better support for community forests in areas of greatest need*

6. *f) Creating new community forests in areas of greatest need*

7. *d) Training for practitioners, including highways engineers and others*

34. Which actions would most help the preparation and implementation of local Tree and Woodland Strategies? (rank the following options in order of preference)

1. *h) Recognising trees and woodlands as key components of green infrastructure, with equal status to green and built infrastructure*

2. *g) Strengthening technical expertise in tree and woodland management in local authorities*

3. *f) Adopting Local Tree and Woodland Strategies as supplementary planning documents*

4. *a) Preparing national guidance on developing Local Tree and Woodland Strategies*

5. *b) Setting local targets for tree canopy cover*

6. *d) Agreeing national data standards for urban trees*

7. *e) Standardising the approach to measuring the value of the urban forest resource*

8. *c) Using canopy cover as a measure to monitor the scale and development of the urban forest*

35. Which actions would most effectively engage people in the management and creation of their local woodlands? (rank the following options in order of preference)

1. *e) Facilitating networks to exchange ideas and share good practice*

2. *c) Enabling community groups to influence decision making about the management of their local woodland*

3. *d) Enabling community groups to participate in the management of their local woodland*

4. *a) Providing more training opportunities to support woodland management and creation*

5. *b) Providing legal support to community groups for the acquisition or lease of woodland*

6. *f) Providing better support for community forests in areas of greatest need*

7. *g) Creating new community forests in areas of greatest need*

8. *h) Supporting the growth of woodland social enterprise in and around towns and cities*

36. Which actions by government would be most effective in addressing barriers to peoples' access to trees and woodlands? (rank the following options in order of preference)

1. *g) Supporting people to become trained/accredited to better facilitate contact (learning and health) with nature*

2. *a) Supporting woodland access through existing incentives and rights of way*

3. *c) Creating new accessible woodlands in and around towns and cities*

4. *e) Improving the quality of access by investing in infrastructure (car parks, trails, path surfacing, signage, seating)*

5. *b) Offering more generous woodland management incentives for those woodlands with public access*

6. *d) Supporting woodland access with bespoke incentives, simply to allow access*

7. *f) Regulating to maintain access rights when creating new woodland*

37. Which of the following do you most value about trees and woodland? (select up to two options)

a) Places to exercise and relax and engage with nature
b) Places for nature
c) A source of sustainable products and employment
d) A resource that provides water management
e) A resource that cleans the air
f) A resource that stores carbon
g) As a feature within towns and cities
h) As part of urban green space
i) Other - please specify in no more than 25 words

38. Which of these actions would best address the funding challenge for the planting and on-going maintenance of trees in urban areas? (select up to two options)

a) Making central funding available to supplement private finance for establishing trees in existing developments.
b) Using planning levers to require developers to plant trees relating to new development on streets and other public spaces
c) Using planning levers to raise funds for on-going maintenance
d) Ensuring the value of tree's longer term benefits are captured to access financing
e) Other - please specify in no more than 25 words

Supporting the Economy

The UK economy is a wholly owned subsidiary of the natural world. Without putting nature into recovery, the environment will not be able to support a sustainable economy which can provide for businesses and people into the future. Protecting, expanding, and reconnecting our native woodlands within a Nature Recovery Network will allow these habitats to deliver multiple benefits for wildlife, carbon capture, flood prevention, and people, and create a range of jobs and support a sustainable economy.

Commercial Forestry

Continuous stands of native woodland habitats have been shown to offer the greatest long-term solution to storing carbon in forests and provide irreplaceable habitat for woodland wildlife[30]. Therefore, it is crucial that the England Tree Strategy focusses on protecting, restoring, and expanding native broadleaved woodland, or risk compromising the capability of woodland habitats to effectively fight the climate crisis.

Commercial forests will undoubtedly play an important role in tackling the ecological emergency and the climate emergency, but they cannot substitute the habitats provided by native broadleaved woodland and early successional scrub. The way commercial plantations are currently managed is not helping the climate crisis, however, commercial forestry can help to protect and improve existing areas of native woodland if planted in the right place, and can enhance biodiversity if sympathetic management practices are adopted.

For new plantation forests to benefit nature and combat the climate crisis, they need to:

- Join up existing woodlands as part of a Nature Recovery Network, increasing our net woodland area and improving the resilience and adaptability of our trees and forests in the face of climate change and new pests and diseases.
- Protect and enhance existing native woodland habitats through buffering and mitigating edge effects, increasing biodiversity within these woodlands, and allowing them to act as net carbon sinks.
- Improve biodiversity through sensitive management for wildlife with the inclusion of native, broadleaved trees and retention of continuous stands of old-growth woodland.

Agroforestry

The Wildlife Trusts support the ambition to increase the uptake of agroforestry within the England Tree Strategy. The incorporation of trees, woodlands and hedgerows within farming systems can offer productivity, mitigation of climate change, water management, biodiversity and landscape, and welfare benefits[31].

Agroforestry should receive financial support through the new ELM scheme, with land managers paid for the environmental benefits provided by increasing woodland cover and the number of trees on their land. The England Tree Strategy should provide 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.

The England Tree Strategy should set out a plan to increase the number of woodland managers with expert knowledge of management of woodland for biodiversity, to provide farmers with expert advice. Payments for agroforestry need to be long term (30+ years) to provide farmers with a regular financial return and need to offer flexibility so that interventions can be managed over time.

[30] Crane E, (2020) Woodlands for climate and nature: A review of woodland planting and management approaches in the UK for climate change mitigation and biodiversity conservation. Report to the RSPB.
[31] https://www.soilassociation.org/media/19141/the-agroforestry-handbook.pdf

Building Materials

Utilising timber as a building material over more carbon-intensive options such as concrete can play an important role in reducing UK emissions and addressing the climate crisis. However, for this to happen the timber products harvested must be used in long-term, permanent structures and not for short term markets such as energy and woodchip. Timber products with a short life cycle do not lock carbon away[28], and the England Tree Strategy should offer support to building practices which aim to keep carbon locked away within timber for decades and centuries.

There is potential to explore establishment of osier beds, riparian trees, and a range of native short rotation cropping through coppicing and pollarding, which would provide renewable materials to use in natural flood management work and installation of woody debris to improve river condition, and fulfil carbon capture simultaneously.

Sustainably grown, local products from coppices could supply allotment and gardeners with materials instead of imported bamboo canes, local artists and makers for craft materials, and also local organisations for tree planting projects, whilst capturing carbon. There would need to be investment in developing markets and support to establish relevant planting.

Energy Forestry

The Wildlife Trusts believe that continuous stands of native woodland habitats offer the greatest long-term solution to storing carbon in forests and provide irreplaceable habitat for woodland wildlife, and reject the concept of energy forestry as a solution to the climate crisis.

Consultations Questions

39. What could the England Tree Strategy do to encourage the use of timber in construction? (select up to two options)

a) Improving, encouraging or incentivising the growth of necessary skills such as those in green construction, design or forestry
b) Promoting and incentivising Grown in Britain Certification
c) Encouraging planning requirements to incorporate sustainable materials
d) Amending public procurement standards to support Grown in Britain certified forest products, incorporate sustainable materials and signal long-term demand
e) Increasing the availability of knowledge and stimulate an understanding of sustainable building practices
f) Supporting new innovations in developing timber building materials such as cross laminated timber
g) Other - please specify in no more than 25 words

40. How could policy about the permanency of woodlands better support tree establishment for agroforestry or energy crops? (select one option)

a) Changing policy so it does not treat afforestation as a permanent land use change
b) Adjusting policy so energy forestry crops (short rotation coppice and short rotation forestry) are not permanent land use change
c) Retaining the current position whereby afforestation is generally a permanent land use change
d) Not sure

41. Which actions would best increase the uptake of energy forestry? (select up to two options)

a) Providing financial support for the capital costs of energy forestry
b) Clarifying the taxation of energy forestry (as either agriculture or forestry)
c) Clarifying the regulatory position for energy forestry (for example, can I change land use in the future)
d) Providing support to develop a secure supply chain (such as forward contracts for feedstock)
e) Providing better advice and guidance on energy forestry

f) Increasing skills capacity in energy forestry
g) Other - please specify in no more than 25 words

Continuous stands of native woodland habitats offer the greatest long-term solution to storing carbon in trees and forests and provide irreplaceable habitat for woodland wildlife.

42. Which actions would best increase the planting of more trees on farms? (select up to two options)
a) Clarifying the regulation of agroforestry as either agriculture or forestry
b) Clarifying the implications for the land holding's tax status of planting more trees
c) Providing better advice and guidance on woodland creation and management
d) Providing incentives for a wider range of tree planting on farms
e) Funding for the advice and the design of schemes for trees on farms and agroforestry
f) Providing better advice and guidance on how woodland creation and management can contribute to farm business models
g) Other - please specify in no more than 25 words

Local Nature Recovery Strategies provide a strategic framework for establishing woodland in locations where it will most benefit nature, people, and the climate.

43. Which actions would best increase agroforestry, woodland creation and management on tenanted farmland? (select up to two options)
a) Providing industry led guidance, best practice and case studies of how tenants and landlords can work together to deliver benefits for both parties from diversification into tree planting and agroforestry on tenanted land
b) Providing eligibility criteria for tree establishment grant agreements to discourage the proactive resumption of tenanted farmland
c) Reviewing how tenancy agreements approach the responsibility for and rights to trees
d) Confirming the property rights to long-term carbon benefits
e) Other - please specify in no more than 25 words

44. What are the most urgent shortages in the workforce capacity needed to increase woodland creation, maintenance and management? (select up to two options)
a) Professional forester
b) Supervisor for forest works
c) Machine operator, for example, tractor/harvester/forwarder drivers
d) Hand cutter / chainsaw operator
e) Tree planter
f) Tree nursery workers
g) Forestry educators
h) Land agents, surveyors and architects with specialist forest knowledge
i) All of the above
j) Other - please specify in no more than 25 words

Woodland managers with expert knowledge of management of woodland for biodiversity (e.g. Coed Cymru http://coed.cymru/index.html).

45. Which actions would best strengthen productivity in forestry supply chains? (select up to three options)
a) Providing grant support for wider range of management options
b) Providing support for woodland infrastructure such as roading
c) Providing grant or loans for equipment (for example, harvesters)

d) Providing support for productivity/supply chains for woodland products
e) Providing better information on market prices and opportunities
f) Training to increase the skills capacity in agricultural workers
g) Facilitating collaborative working between woodland owners
h) Developing options for private investment for ecosystem services that drive woodland management
i) Other - please specify in no more than 25 words