HOUSE OF COMMONS

Environment, Food and Rural Affairs Committee

Oral evidence: Tree Planting and Woodlands, HC 356

Tuesday 13 July 2021

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Watch the meeting

Members present: Neil Parish (Chair); Ian Byrne; Geraint Davies; Dave Doogan; Dr Neil Hudson; Robbie Moore; Mrs Sheryll Murray; Derek Thomas.

Questions 129 - 181

Witnesses

I: Jill Butler, Director and Chair, Forest of Selwood Community Interest Company; Robin Gray, Development and Funding Officer, Forest of Bowland Area of Outstanding Natural Beauty, on behalf of the National Association for AONBs; Dr Darren Moorcroft, Chief Executive Officer, The Woodland Trust.

II: Melanie Baines, on behalf of the UK Environmental Law Association; Jenna Hegarty, Deputy Director for Policy and Advocacy, RSPB; Emi Murphy, Nature Campaign Lead, Friends of the Earth (England, Wales and Northern Ireland).

Written evidence from witnesses:

– Forest of Selwood Community Interest Company

- UK Environmental Law Association

- RSPB

- Friends of the Earth

Examination of Witnesses

Witnesses: Jill Butler, Robin Gray and Dr Darren Moorcroft.

Q129 **Chair:** Welcome to the EFRA Select Committee. Our evidence session today is looking at tree planting and woodlands. We are delighted to have Jill Butler, Robin Gray and Dr Darren Moorcroft. Jill, would you like to introduce yourself first?

Jill Butler: Thank you very much for inviting me to join you today. I am here representing the Forest of Selwood, which is a community interest company. Do not be misled by the term "forest", because we are using that in the medieval meaning of the word—a mosaic landscape that is rich in wildlife, but driven by natural process. We want to see a richer, wilder place. It also has within it five headwaters or river catchments. One of these directly impacts on the Somerset levels and others have impacts on cities.

I am a leading British tree ecologist, specialising in ancient and veteran trees, wood pasture, parkland and old growth forest; I am also a chartered forester. I have travelled the world, especially in other parts of Europe, looking for ancient and veteran trees and their semi-natural landscapes, such as silvopastoral and wood pastures. These landscapes and trees are threatened worldwide because the awareness of how valuable they are is only just beginning to be recognised. The UK happens to be relatively rich in comparison with many other countries in the world, with old trees and wood pasture—think Richmond Park.

Chair: Thank you very much. We will get much of your knowledge in our questions. It is just a brief introduction that we need, but we will look forward to you giving us some great answers in a minute.

Robin Gray: It is a great honour to be here today. I am here principally to represent the National Association for AONBs, the 43 areas of outstanding natural beauty, but I would also like to try to represent the views of our national parks and wear my Landscape Institute hat. As landscape architects, the main point we want to get across is about a landscape-scale and landscape-based approach to woodland creation and woodland management in general.

Dr Moorcroft: I am Dr Darren Moorcroft. I have the privilege to be the chief executive of the Woodland Trust. The Woodland Trust is the UK's largest woodland conservation charity, with an aim to protect and restore our ancient and veteran trees and to create new woodlands for the future, for both people and nature. We are an organisation that is supported by over 500,000 members and supporters across the UK, who are all keen to have woods and trees near them—and also in the far-flung places that they will never see but that they appreciate the value of.

Q130 **Chair:** Thank you very much. We have several questions for you this afternoon. If you could keep your answers very succinct and up to the

mark, it would be very useful.

To all three of you, does the England trees action plan include the right measures and incentives to reach net zero, or are there risks in the Government's strategy? That is quite a big question. Shall we have ladies first? Jill, have a go, please.

Jill Butler: The simple answer is that there are many good words within the action plan, but we have yet to see the action that we would like in terms of our particular landscape. The emphasis is on tree planting and particularly woodland creation with the woodland creation offer. We want trees, and in some places more trees, but we reject this simplistic and quantitative approach to tree planting. We do not consider that it is really addressing, equally, the biodiversity and the beauty or quality benefits at the same time.

We attribute this to a shortage of tree ecologists in all the systems that are working in this way. We know that the plan has recognised trees outside woodlands, and we know that most of our most important mature, ancient and veteran trees are outside woodland. The Government's own information indicates that only 1% of woodlands have ancient and veteran trees in them, because of the understanding of the word "woodland". The wood pasture and parkland element is so often ignored. We want to see much more activity for trees outside woodland.

Chair: Can we leave it there, because I want to bring the other panellists in? I very much take your point that it is not just trees in woods that matter; it is also parkland and individual trees. That has not really been covered by the policies that have been put forward, so you make a really good point.

Robin Gray: In terms of the National Association for AONBs, and indeed the national parks together as national landscapes, we see the main vehicle for delivering on these ambitious targets as the management plans and more specifically the partnerships that we manage as these specific landscapes.

In answer to the specific question about trees and where they will all go, in the past we have perhaps had a postcode lottery. There are some very active partnerships—I would mention community forests—that have been driving this agenda forward, but there are other parts of the country where there are not necessarily the mechanisms to support that. Obviously that is with the exception of the Woodland Trust; I am sure Darren is going to speak in a minute.

As for actually deriving local partnerships, in the national landscapes we already have that partnership in place. We have already put our name to what we feel we can achieve under the England trees action plan and in terms of nature recovery. It is those other areas that we now need to focus on as regional partnerships or under nature recovery through the local nature recovery strategies that will be formalised later this year.

Those are really important mechanisms that the Committee should consider as the hooks for delivery of the trees action plan.

Q131 **Chair:** Darren, you welcomed the announcement of a consultation on a long-term tree target. Jill was making the point about whether this is about the number of trees or the quality of trees and the biodiversity. We want to plant a lot of trees. Are we planting the right ones?

Dr Moorcroft: In answer to whether the England trees action plan is appropriate, it says the right words, as has been said, and we welcome it because of the focus it provides. On the point about the area target and/or the number of trees target, that potentially creates a risk that we would like to avoid.

We want to see quality and quantity. We want to focus on the outcome; we want to be clear about what we are trying to achieve. That is where the England trees action plan needs to move into its implementation and be much clearer. It is very welcome to see it investing in natural regeneration, it is very welcome to see it investing in nursery capacity, and it is very welcome for it to increase the amount of funding going into incentivising landowners to create new woodlands, but it has to be in a co-ordinated way. We have to be very clear: if we are talking about 30,000 hectares, what do those 30,000 hectares look like? More importantly, what will they deliver for public money for public goods?

Q132 **Chair:** How well will biodiversity be supported by the England woodland creation offer and the environmental land management schemes? Is there enough biodiversity in them?

Dr Moorcroft: We have had informal comment from the forestry Minister about the desire for it to deliver for biodiversity, but we would be particularly keen to see it be explicitly designed to do that. This goes back to the point about ensuring that we are clear about the outcomes. In our view, public goods like nature recovery and dealing with the loss of nature, alongside sequestering carbon, will only be delivered if we have a very clear signal from Government through the schemes that this is what they are designed to deliver. If they do that, we can rightly applaud the ambition for 30,000 hectares of the right trees in the right places, being managed in the right way and doing the job that everybody wants them to do.

Robin Gray: In terms of nature recovery, I made the point about local nature recovery strategies being a possible mechanism for delivering woodland creation. I echo the points made by Jill and Darren: it is about quality. As a landscape architect, it is really about quality as much as the numbers.

We also need to recognise that mistakes have been made in the past. We need a risk management strategy that makes sure that we get the right tree in the right place. Everyone is talking about the right tree in the right place, of course, but we really need to learn from some of the mistakes

that we have previously made with inappropriate planting on important priority habitats that has had an impact on ground-nesting birds and other important species. That is a point that I am sure will be echoed by the RSPB.

Q133 **Chair:** That is an interesting point. There is a great drive towards planting trees for capturing carbon, but we have to balance that with good biodiversity and better biodiversity. Jill, I probably know what your answer might be, but would you like to comment?

Jill Butler: Natural England has made it clear that we cannot apply generic habitat management when we have key species that we need to have outcomes for. I refer you back to the 2010 Natural England report that looked at the biodiversity action plan species and associated them with different habitats. Out of the 256 "woodland" species, in inverted commas, 41% are associated with large open-grown old, ancient and veteran trees, 40% with glades and rides, 28% with scrub mosaics and only 23% with closed canopy. If we could apply that sort of approach to woodland creation—41% given over to growing open-grown trees, 40% for the glades, 28% for scrub and only 20% for the closed-canopy element—that would create much better outcomes for biodiversity, which we already know about and should be addressing.

I would also bring you back to the fact that we think a lot can be done with the landscapes outside woodland creation. I have just spent time on east Devon farms looking at veteran and ancient trees in hedges and in fields. There is a huge amount that we can do for carbon sequestration by looking after our really important habitats outside woodlands. That could be a much more cost-effective way of achieving biodiversity and addressing carbon.

Chair: I am glad you have been to east Devon, because that is part of my constituency—in particular the Blackdown hills, where you have a lot of trees in hedges and some trees out in the middle of fields. They create very good biodiversity, so you make an interesting point.

Q134 **Dave Doogan:** Thank you to our witnesses. Can I invite very brief answers from them all to this first question?

How well is Government policy and funding supporting the management of existing woodland? Does the England trees action plan address any of the highlighted shortcomings?

Robin Gray: It is a really important point. Woodland management is the Cinderella of this whole topic of woodland management, is it not? In the past, the incentives for managing woodland in a sustainable way have just not been sufficient. I do not have the figures, but there has been a real decline in terms of woodland being actively managed.

I am not aware of the figures, but the new environmental land management scheme is a key item to increase the potential for active sustainable woodland management. It is of great concern, because we

have some really big threats not just around climate change but over pests and diseases, notably ash dieback. We could see a really big change in our existing woodland. While we are focused on woodland creation, it is really important that we get the incentives right for managing existing woodland.

Jill Butler: In terms of veteran trees and deadwood habitat, I am afraid that the Government's own information indicates that it is very poor: 1% of woodlands have these iconic ancient and veteran trees, while 75% of woodlands are well below the minimum in terms of the decaying wood habitat. We have a real issue in terms of our woodlands.

My concern, again, is this Cinderella element of the wood pastures. Can I give you a little example? There is a flagship site in Kent that is being created—a woodland creation scheme. I have made the point about how I would like that to be developed, and of course it is not being developed in that way at all. The non-native conifers are going right up to the boundary with a grade 2 historic park and garden, which has 47 veteran and ancient trees within it, four of which are oaks with girths well over six metres. We are talking about 500-year-old oaks.

There has been no thought about the Lawton principles in terms of buffering and extending that historic parkland at all. This is what we have to remember: our wood pastures and parkland are the diamonds of the jewels in the crown, and they are absolutely not being looked after adequately. Nor are we looking after the tree elements outside the woodlands.

Dr Moorcroft: The *State of the UK's Woods and Trees* report that the Woodland Trust published in April showed that only 7% of our native woodland is in good ecological condition. That is driven by many factors, but management is a critical one. I think all of us—the witnesses—would agree that management is a key area that needs to be addressed.

The challenge is that the ETAP says very little other than saying that there will be some work to come on ancient woodland restoration and overall condition through the woodland resilience strategy. We look forward to that, and we look forward to feeding into it. We have seen very small amounts of money come through the nature for climate fund for management, and that is another area where we would want to see Government policy and incentives drive the right management in the right way.

Sustainable management, as has been said, is the Cinderella of the woods and trees business. We just need to make sure it gets its moment in the sun.

Q135 **Dave Doogan:** Darren and Jill, you have both expressed concerns about the planning system and the Government's reforms. How much of a problem is it for the protection of ancient trees and woodlands? Jill, I appreciate that you have covered some key elements, so if you want to

just give another example or take a pass on this, that is fine.

Dr Moorcroft: The planning system is really important for the protection of our ancient and long-established woodlands and our trees outside woods, as has been mentioned. We have things like the TPOs, which are not particularly fit for purpose at the moment. We need to look at them and make sure that they are delivering against the multiple benefits that you can get from these trees. They are protected on the basis of very specific criteria, but we know that trees give much bigger and wider benefits. That is where the planning system and the work with local authorities is crucial. If we lose our protected and existing woodland, there will be a major problem. We will not be able to deliver against our targets simply by planting our way out of it.

Jill Butler: The national planning policy framework does recognise ancient and veteran trees and gives them good protection, but we have not clarified what is meant by national infrastructure, so we are losing trees through that.

I am afraid that policy does not protect trees. These trees can be removed before a planning application is put before a local authority, so our absolutely precious trees are not really protected at all out there in the landscape. We have put forward some suggestions for ways in which we would like to see that addressed.

Q136 **Dave Doogan:** Finally, to all of you—with very swift answers—how can we get the right balance to enable development to go ahead? You have set out very clearly the priority to protect very valuable tree assets, and that is fine, but how do we ensure that we do that while still allowing development to go ahead?

Jill Butler: In my view, we are still very deficient in terms of knowing where those assets are. There is a wonderful project, the ancient tree inventory, which has been led by the Woodland Trust and supported by the Ancient Tree Forum and the Tree Register of the British Isles, but it is a citizen science project. These are the jewels in the crown, but there has been very little Government support or even recognition of that particular project. It is really important that we know where they are so that we can look out for them and make sure that they are protected in terms of planning.

Dr Moorcroft: Building on what Jill has just said, the ancient tree inventory allows people to be informed about the decisions they make. What we know now is that there is a heightened awareness of the value of green space and trees. When you are looking at where a development should go, the first thought should be, "How do I retain?" rather than, "How do I remove?"

With the changing climate, we know about the benefits that come from trees in urban environments in terms of shade and reduction of the requirement for things like air conditioning. We should be building those

into the green infrastructure of our development. We should be able to say, "We can develop, but we are going to develop in a different way."

Robin Gray: We have a postcode lottery on woodland creation, but even more so when it comes to protecting individual trees. That postcode lottery is really dictated by local authorities and local planning authorities, and what emphasis they put on enforcement of TPOs. You might have two adjacent local authorities with radically different approaches not just to creating TPOs but, just as fundamentally, to enforcing TPOs.

I can think of a local authority near me in Yorkshire, which is actually on the verge of putting a TPO on every single mature tree. I am not quite sure whether that local authority has resources to manage that regime, but it goes to show that it is putting real value on these existing trees. You do not need telling this as MPs; your mailbags will be full from residents who value those trees. If they lose them, as we have seen in various cases up and down the country, it is a real loss not just to biodiversity but of amenity and community. How they value those trees is really important.

Dave Doogan: Excellent. Thanks very much.

Q137 **Mrs Murray:** The first part of my question is addressed to Robin and Darren. Nationally, do we know which are the right trees and where the right places are to plant them?

Dr Moorcroft: As has been said, the phrase "the right tree in the right place" is often used. A lot of that is based on the local understanding of the site and the landscape in which the trees sit. We have a very clear definition of this that you will perhaps not hear from others. When we talk about the right tree, we talk about the sourcing of that tree as well as where you put it. We source from 30-plus nurseries across the UK, which are all growing and sourcing their trees from within the UK to remove and reduce the risk of imported pests and diseases that has been mentioned.

We put 5 million to 6 million trees per year into the environment. It is critical not only that they are put into the habitats that will create the backbone for our landscapes and that they do not destroy existing high-quality high-species habitats, but that they do not introduce a pest or disease that would knock out some of the fantastic ancient, veteran and long-established woods and trees that we have. If we do that, we are increasing the net volume of woodland and canopy in the UK rather than risking it.

Robin Gray: I certainly commend the Woodland Trust. I have worked with the Woodland Trust for over 20 years. Some of the work that it is currently doing, as Darren said, on UK Sourced and Grown provenance is not just good for woodland; it is good for the industry. It gives local nurseries long-term benefits. On the ground, many woodland officers are now approaching AONBs and national parks locally to ensure that they

are not planting the wrong tree in the wrong place. It has been really reassuring that we have had that dialogue with the Woodland Trust.

If I could put this slightly on its head, though, I know that in the Devon woodland strategy—the Chair will welcome this—they are talking about the right place before the right tree. In other words, are we missing a trick here? Should we not be thinking about landscape restoration with trees as part of it? An all-encompassing landscape restoration would include some of the elements that Jill holds dear with wood pasture and hedgerows, so that we begin to think of our landscape as a whole. This is a real lesson that we could learn from national parks and AONBs, with a landscape-scale approach, but also something enshrined in our management strategies and partnerships.

Q138 **Mrs Murray:** To follow on from that, do you think that looking at the geographical location, and perhaps making sure that historical species of trees are protected, should be a factor?

Dr Moorcroft: Yes, absolutely.

Q139 **Mrs Murray:** I ask as someone who planted a very old Cornish cider apple tree a couple of years ago. Should we be protecting our historical species and looking at the geographical location of these species as well?

Jill Butler: Can I just say a few things? Yes, absolutely. You have community interest in doing that and great support for doing that. If I could go back to this flagship site in Kent, they are going to plant 110,000 trees on 127 hectares. Are you telling me that every tree is in the right place there?

Q140 **Mrs Murray:** I am going to come on to that with the second part of my question, which is to all of you. I will go to the two gentlemen and then give you the final word, Jill.

Practically, what are the key things that need to do to make sure we plant the right tree in the right place? Perhaps I could come to Darren and Robin, and then you will have a free hand, Jill.

Dr Moorcroft: The first thing you need is good data to know what is there already. We have done a piece of work with our partners in the Northern Forest, which looked at where you were going to put 50 million new trees. There is a very different distribution depending on whether you want it to be multifunctional or you simply want to capture carbon. Being very clear about what you are trying to achieve and the impacts of what you are trying to achieve will determine where you go.

It has to be said that there is no substitute—this is one of the reasons why the Woodland Trust is heavily invested in outreach advisers—for people going out on the ground and walking the areas that are going to be planted. We have seen that Government agencies also need to bolster their staff to be able to do this, in order to ensure that when plans are coming forward, they can move through the process quickly and in a way

that means we are doing the right things in the right way. Otherwise, the risk is that we are guessing what the right thing is without actually seeing it on the ground.

Mrs Murray: Do you have anything to add to that, Robin?

Robin Gray: I do, actually. On "right tree, right place", I know that Members have heard from members of the forestry industry as well. Whenever I can plant native trees—native trees do the best job—I am planting native trees, if I have that option. However, in the past I have planted on colliery spoil tips and landfill sites, where we make the most of some of the species that are going to create woodland on those really hostile sites.

As the hon. Member from Scotland will know, in the central belt of Scotland a lot of really innovative forestry has occurred close to our urban areas. That has not been native, but it has allowed woodland to thrive on derelict and very hostile environments. Excuse me, because I am moving into a job with the Forestry Commission, where forestry is an industry, but timber production has a really valuable role in our rural areas. There are places where that is entirely appropriate and places where we have to be very careful about planting plantations that might damage existing habitats or species.

Jill Butler: We often say "right tree, right space". This is critical. Again, I refer you back to those species of biodiversity concern. Many of them are associated with open-grown trees. We are all interested in carbon, and an open-grown tree has 20 times as many little solar panels on it as a plantation tree. Do not underestimate the carbon sequestration that is happening in the trees, above ground and below ground in the roots, and how valuable those trees are to the farming community in terms of stock welfare and helping to put vital nutrients back into the ground in the best way possible.

We need tree ecologists. I would put a plea out there for tree specialists who understand what we need across all landscapes, not just in urban areas and not just in forestry but in an enormous amount of the farmed landscape. Can communities please be enabled to put forward their ideas for the trees in their landscape and what they want to see? Can that be supported?

We have worked with FWAG to develop a Selwood Forest facilitation group with 38 landowners. They are bursting to get going. How can we inspire them to put the trees in the landscape in the right place? Please give us the right tools. We do not have any tools at the moment to help us to do what we are passionately keen to do. We know it will make our country beautiful, we know it will give us wildlife and we know it will be brilliant for carbon sequestration.

Chair: Thank you, Robin, for saying that Devon is leading the way in tree planting. We need to get this right, with the right tree in the right place

with the right space for it. I was planting a tree locally. It was an oak, and the organisation, which I will not name, was trying to get me to plant it in a very small area. I said, "This oak will not live here—it will not grow and develop here."

There is a lot that we need to do. We want to plant many trees, but we do not just want to go on a mad political tree-planting spree with all the political parties having a Dutch auction on how many trees we can plant. We have to get it right, so we appreciate all the evidence this afternoon from all three of you.

Q141 **Derek Thomas:** Having just planted 20,000 trees through 2020 and 2021 with the Woodland Trust, I can confirm that we worked extremely hard with the Woodland Trust and landowners to make sure that the trees were native trees planted in the right place here in west Cornwall. That is good. We have a massive plan in Cornwall to plant more trees.

This question is for Robin and Darren. The Government are looking to streamline regulatory processes for tree planting. Is this necessary? Do you support this approach?

Robin Gray: The UK forestry standard is pretty much the bible, if you like, for woodland creation in the four nations. It is actually a really good document. I have heard some complain that it is now up to 230-odd pages; it used to be a slimline edition. But when I look at that document—perhaps I am one of the few people who have actually read every single page—to see what I would cut from it, I am not entirely sure which bit I would cut.

When we think about woodland creation, we need to think about why we are planting trees. That may be carbon; it may be nature recovery; it may be—we have not mentioned it—reducing surface water flow and reducing flooding downstream; or it may be timber. There are so many aspects to this industry. It makes it such a fascinating career to study. I have listened to Jill many times as well, and her perspective is so different and so valuable.

I do not know what bit of the UK forestry standard that you would cut, but I will tell you this: the bit that I would really want to keep and even expand is the element on landscape. What we might see with this increase in woodland creation is cumulative impact. As an example, again, I will use the wonderful enclosed medieval landscape of Devon. We would not want to lose that landscape for future generations, so any woodland creation would have to fit within the grain of the landscape if we are to protect the very thing that we hold dear in terms of our protected landscape.

Derek Thomas: Thank you, Robin. You are doing well to talk about Devon, because it will mean your recommendation will get in the report. Well done.

Chair: We might mention Cornwall, Derek—it is okay.

Derek Thomas: We are feeling left out down here.

Dr Moorcroft: Thank you for the 20,000 trees, Derek.

I suppose I would make two points. One is about the UK forestry standard. For us it has to be a minimum standard. Like Robin, perhaps, we are not looking to take things out, but how do we make sure that the grants that will drive new woodland creation are going beyond that as a minimum standard for us so that we are really getting value for money for the public? That is a really important process, and that is being reviewed at the moment.

The other point is about the environmental impact assessment. We welcome a strong baseline for that environmental impact assessment, but we also recognise that it operates in such a slow steady state, for want of a better phrase, that it can put landowners and others off. It can take too long between taking the decision to plant and manage, and actually getting the permissions. That is a function of the resources of the likes of Natural England and the Forestry Commission: they do not have the capacity to do the pieces of work that move these things through the system quickly enough.

If we really want to scale up the amount of woodland creation as well as protection, we need to invest in people. We need to invest in people who know what they are doing and know what they are talking about, who can talk to landowners and others in a way that they understand and can appreciate in order to move the system more quickly and to get better results.

Q142 **Derek Thomas:** At the end of the day, the trees were 90% funded by Government, via the Woodland Trust. The 20,000 trees were very welcome. The process was relatively straightforward, but we are talking about a tiny amount of trees, really. The experience we had—this is why I am interested in this particular subject—is that there were those in DEFRA and in Cornwall Council who sought to put added layers of challenge and bureaucracy on what we were trying to achieve.

In terms of streamlining the regulatory process and enabling us to take away the barriers that put people off, as you have hinted at, are you concerned that in exchange for planting more trees, we will weaken environmental controls? Is there a risk of that? At the end of the day, if we had gone down the route that we were being encouraged to go down by other agencies, such as DEFRA and the council, we would have planted a lot fewer trees. We did not need to, so we did not.

Dr Moorcroft: We are concerned that we get the right process that protects the environmental potential and value of the land on which those trees are placed. We believe and firmly support the fact that we need more trees and we need the right trees doing a great job, but let us make sure we put them in the right place. We can do that, and if we do, Cornwall, Devon, all your constituencies and the other parts of the UK

can benefit from good-quality trees doing the right job alongside a landscape that is rich in nature and all the other habitats.

Derek Thomas: I completely agree.

Jill Butler: I would just re-emphasise that we need the right people advising out there. We had the confidence that we had the right people who knew what the right things to do were.

What really concerns me is that I have looked at the new forestry map. I cannot quite understand why we have to have a forestry map with opportunity mapping as well as MAGIC—and then drop some off the most important habitats from MAGIC and not put them on the forestry map, so that potentially we could be planting in the wrong place.

Let me give you another example from east Devon: Woodend Park. Aljos Farjon recently said that it was one of the top 33 wood pastures in the UK. It is not designated. We knew 40 years ago that it was of SSSI quality, but it is not on the map and so, in terms of opportunity mapping, it is for dense planting and there are incentives for dense planting. That is really going to be against biodiversity.

This is exactly why I support Professor Ian Bateman, one of your previous witnesses, who said that this could do enormous damage if we are not careful enough. We do not have enough information if we are not looking out for grasslands and other habitats as part of the whole process.

Q143 **Derek Thomas:** We need to run a campaign to make sure they write to their local MP, Chair. In Cornwall, I guess the geography is slightly different. There are lots of parts of Cornwall where trees are just not going to grow, so we can benefit from other things. You are right: it is very clear that we need to put in trees and provide biodiversity in all sorts of ways in harmony.

Dr Moorcroft: On Jill's point about having a mix of habitats, they work at a site level and at a landscape level. Within the almost 30,000 hectares of woods that we manage across the UK, we are trying to create that mix of habitats so that we have the diversity of closed canopy, open areas, wildflower meadows and ancient woodland, buffered by natural regeneration, as well as planted trees.

One of the things that I would not want to lose sight of is the real power of planting a tree as part of a connection with nature. An individual can make their own difference. One of the great things that the Woodland Trust has been able to do is that nearly a quarter of all schools have planted native trees with us. I would like it to be three quarters to 100%. We will get there, but we cannot underestimate either the value of the tree itself or the value of the connection with the person who puts it in the ground.

Derek Thomas: I agree. The child can see that legacy in years to come.

Robin Gray: I just have a very quick point to echo what Jill has said. There is no substitute to boots on the ground and expertise in organisations. Woodland opportunity mapping is a really powerful tool, but it is only powerful when it is used in combination with site visits. Some of these mistakes, which Jill has hinted at and we are all aware of, have occurred when there has not been local knowledge. Local knowledge needs to be co-ordinated, whether that is through nature recovery or a local nature partnership. You need to have woodland officers seeking out the expertise of their colleagues, who might be ecologists, archaeologists or indeed landscape architects. If you have that, you are reducing the risk of these mistakes going forward.

Chair: Thank you for those answers. What we designate as woods and as forest in the future is a really interesting point that Jill and all of you have been making. We are very much taking that on board.

Robbie Moore: We cannot have Devon taking all the credit for tree planting.

Chair: No, quite.

Q144 **Robbie Moore:** There is certainly some good tree planting work going on in my constituency of Keighley up in West Yorkshire. I might just draw the Committee's attention to the Register of Members' Interests, because we have just planted five hectares of trees on my home farm in Lincolnshire through the Woodland Trust.

My question is about regenerative tree planting. In one of our last evidence sessions, we heard from Dr Amanda Thomson, who said that "natural regeneration can work, and it can be a cost-effective option, but only in certain areas. Those areas need to be adjacent to somewhere that already has a good diversity of native tree species". We have heard evidence about having to have the space for natural regeneration to take place. What kind of contribution can natural regeneration make to achieving net zero?

Dr Moorcroft: It can make a significant contribution. Particularly, it can make an increased contribution to where it has been done previously. We know that natural regeneration will play an essential role in ensuring that we have woodlands that are adapting to climate change much more easily. We know that it is part of the solution, but it cannot be everything because, as has been said, it cannot happen everywhere—not at the pace that we believe is needed to arrest the climate and nature crisis.

We have used natural regeneration across our estate, particularly buffering ancient woodland. We have supplemented that with planting. Some of the biggest woodlands in the UK now have been generated by connecting up ancient woodland within the landscape through natural regeneration and planting, and creating really special places for people near to where they live. Natural regeneration is often seen as a tool that works out in the sticks miles from anywhere, but it can work in almost all types of landscapes—just not in every landscape.

Q145 **Robbie Moore:** What degree of certainty can natural regeneration give compared with planting, given that climate change means that we have to reach net zero by 2050? Is it realistic?

Dr Moorcroft: There is always uncertainty in ecology, but what we have seen in our own experience with natural regeneration, and to some degree planting as well, is that in areas where there is a good seed source, establishment can be really positive and can deliver the scale of woodland that you would want if you were planting, so there is a real contribution to be made. But in certain areas where that seed source is not there, we have to be very honest and say that we have to supplement the seed source by planting. Over time, natural regeneration will make its contribution, but it will not be in the short term.

Robin Gray: I echo Darren's points. I also commend the work of the RSPB. I was in a webinar that became very heated between those promoting natural regeneration and those promoting traditional woodland forestry or carbon capture. I am not sure whether I can actually give you the answer, because it is really involved. Ultimately, we are dealing with ecosystems that are dynamic. The actual relationship between the vegetation, as Jill has put it, the leaves, the yield and the soil is really complex and changes over time.

I would echo what Darren has mentioned, in that natural regeneration is not simply about not managing a site. I am speaking to you about 10 miles away from Keighley, in the south Pennines. The woodland that we would love to create from a biodiversity point of view is what in this part of the world we call clough woodland. Clough woodland has fantastic value in terms of biodiversity, but our main threat is not climate change but sheep. Managing a site to exclude over-grazing and to get to establishment means getting the financial incentives right for farmers to actively manage to keep sheep out of that woodland compartment.

It is not just a question of letting things go; it needs to be actively managed. As Darren said, it may well need enrichment planting a few years in. Too many schemes are "plant them and run away", if I can characterise them like that. You need to actively manage woodland creation.

Jill Butler: I have a very alternative view on this. I like natural regeneration and we want natural regeneration, but we reject the Government's offer on natural regeneration because we think it is starting from the wrong place. I refer you to the Knepp wilding project, where the biodiversity trajectory for all the species—nightingales, turtledoves and so on—is going up. That cannot be replicated in the other so-called natural regeneration places.

Knepp has studied it and shown that it has twice as much carbon in the soils as the arable landscape around it. We believe that it has doubled its carbon sequestration. Our figures on carbon sequestration for anything other than forestry are absolutely dire. Natural England had only one

page out of its 240-page book on carbon sequestration from habitats on wood pasture and parkland. On that one page, it said that wood pasture and parkland could be better than woodland alone or grassland alone, but that is not being talked up enough because it was one piece of research.

We have to be extremely careful, as Professor Ian Bateman said, about natural regeneration in the wrong place. There is plenty of scope for trees in this landscape without planting, because we have vectors like the jay, the nuthatch and all sorts of other species, which move trees across the landscape. I have been to Corrour on Rannoch moor, and I have seen the regeneration on Rannoch moor. That is a huge area of very low tree cover, and they were not planted.

Q146 **Robbie Moore:** To follow up on that, on reaching net zero by 2050, am I right to assume that you feel that natural regeneration has its part to play and could have a significant part to play in reaching that level if only Government strategy were better aligned?

Jill Butler: Yes, but we would like to see biodiversity as well. The Knepp wilding project leads the way on that in having regeneration as a wood pasture with grazing animals. This is a habitat that is putting organic matter into the soil. Soils are the best at capturing carbon, and quickly. With planting, we know that there is a lag before the schemes start to reduce carbon, whereas in less than 10 years the Knepp project is showing that it has doubled the carbon in the soil. We have to look at the evidence of the other habitats.

In the Forest of Selwood, we believe that the cumulative nature of looking after the habitats we have—grasslands, hedgerows and so on—would be a massive contribution to carbon sequestration without the need for huge woodland creation schemes along the lines of the offer that is being provided.

Chair: Geraint has what I would describe as a supplementary, linked question.

Q147 **Geraint Davies:** Darren, what are the Woodland Trust's views on using wood in the construction of buildings as a form of carbon storage, as opposed to burning it, which causes climate change and a particular health risk in terms of particulates? In urban environments, 40% of PM2.5 is from burning wood, as it happens. What is your view on using wood in buildings as opposed to burning it?

Dr Moorcroft: We are very positive on it being used as a source for buildings. There is an opportunity for our productive woodlands, be they the soft woods or the hard woods, to play a really important role in removing the need to import so much timber. We can look at how we sustainably manage those productive woodlands to deliver more biodiversity as well as carbon sequestration.

You lose the carbon argument if you are then burning the timber rather than locking it up into buildings. As I say, there is a real opportunity. If

Government can drive that mechanism, potentially by ensuring that it incentivises the right productive trees in the right place to deliver for the construction industry, it would be a valuable thing for us in reducing the imports that we have become reliant upon.

Q148 **Geraint Davies:** So in a nutshell, you think that the Government should encourage more wood in buildings for carbon storage and discourage burning wood. A lot of wood is burned domestically, in Drax power stations and others. Would you agree that we should encourage building and reduce the amount of wood we burn?

Dr Moorcroft: Yes, because the sad reality is that locking the carbon into timber and then releasing it through burning at a later date simply means that we are putting back into the atmosphere what that tree had been doing for society in taking it and sequestering it. If the Government can play their role, encouraging that timber to be used in buildings would be much more beneficial.

Q149 **Geraint Davies:** Finally, what would you think about allowing or even not allowing trees to rot? If you have a tree and you cut it down to put it in a building, you store the carbon; if you simply let it rot, it generates a lot of methane. My understanding is that methane is 80 times worse than CO_2 for climate change. Is there something to be said for trying to limit the amount of trees that simply rot?

Dr Moorcroft: The point I would make with regard to rotting wood is how incredibly important it is for biodiversity and for the nature of that woodland. One of the key things that stops our woodlands being in good ecological condition is the lack of dead wood and the incredible habitat that it creates. I would be very nervous about losing that, because it is a key part of the woodland ecosystem.

Q150 **Geraint Davies:** Robin Gray, limiting ourselves now to burning wood versus putting it into buildings, would you agree with me that Government should be encouraging more and more wood in buildings, particularly in place of concrete, and not burning it, which causes climate change and a public health problem?

Robin Gray: I can see where the question is aligned and I agree entirely with the sentiment. The issue is that creating timber of a standard that the industry can use requires productive forestry and infrastructure, which might mean logging routes. It means making sure that the infrastructure for that industry allows you to extract timber with a financial return.

The problem when we are managing some of these woodlands is that they are very small and the access is really limited. The only product that tends to come out of it that has a financial value is logs for burning, unfortunately. This is perhaps where Government needs to intervene. If you want to reduce that, you have to disincentivise burning and find other uses for woodland products coming from small woodlands. That is

no easy thing, because a lot of that timber may not be useful for the building industry.

Q151 **Geraint Davies:** My understanding is that the vast majority of imported hardwoods, for instance, are burned. What is more, any wood can be pulped and used as an insulation material in buildings. Better woods can be used for construction, obviously, but virtually all woods could be used continuously as carbon storage for insulation. It is just a matter of focus for the Government, is it not?

Robin Gray: Yes, it is. If we are talking about the importation of wood pellets, you are right. Those are coming into power stations as well, but that is on a completely different scale from these small woodlands. We are talking about different ends of a quite complicated supply chain.

Geraint Davies: Jill, do you have a final thought on this?

Chair: Sorry, Geraint, but this is a supplementary question and I have been very generous with time.

Geraint Davies: Okay, I will leave it there. It is a big issue.

Chair: Thank you. Can I bring in Ian for the last question to this panel?

Q152 **Ian Byrne:** Darren, you have been concerned that the Government have allowed checks on plant imports at place of destination. How much of a risk is there of pests and disease being spread before they are detected?

Dr Moorcroft: There is a very high risk, if history proves anything. We have seen a 1,450% increase in the importation of trees between 1992 and 2019. Not surprisingly, that has been mirrored by an increase in the importation of 19 very serious tree pests and diseases.

Ash dieback has been mentioned as an example of a pest and disease. We know that it has the potential to kill a significant proportion of mature ash trees, which are our second most common tree, at a cost to society of an estimated £15 billion. One of the reasons why our organisation is so strongly of the view that UK and Ireland Sourced and Grown trees are so valuable as the right tree is that they reduce that risk to a level that is far more acceptable.

We know the Government are relying on their Plant Healthy certification. That certification is a good thing; it is a voluntary initiative that raises the awareness around biosecurity, but unfortunately at the moment it does not tackle the main cause by preventing those importations. As we continue to want to put more trees into the environment, we have to be really mindful of where they come from and what they bring with them.

Ian Byrne: That is a really comprehensive answer.

Jill Butler: I agree with Darren that we have to be very careful about what we import from abroad. I am also thinking about the ecology of those trees that have been brought in from different parts of the world

with different adaptations to their local conditions. I am convinced that they will be more stressed because of the different conditions in which they are put, which then makes them more prone to vulnerability to other effects.

We need to have the best possible tree health in this country because we are going to have droughts. Droughts are one of the biggest issues for trees. They are going to be longer and very severe, and we need our trees to be in the best condition possible.

Robin Gray: I echo what Darren said. Organisations like the Woodland Trust are really on top of the issue, because it is a big one for us in the industry. The problem lies in some of the smaller players in the horticultural trades. People are trying to do the right thing—sourcing trees, getting a small number of trees from a garden centre down the road—but there is not enough knowledge of the damage that they could be doing to our habitats and existing tree cover, so there is an education issue as well.

Q153 **Ian Byrne:** These are fascinating answers. Robin, in the light of what the three of you have just said, how can we make sure that robust biosecurity controls are in place without undermining trade in plants between the UK and EU?

Robin Gray: Ultimately, it is an issue about border controls, the Animal and Plant Health Agency and checks. The enforcement of checks, from what I gather, is quite light-touch; enforcement at garden centres and in the horticultural trade is quite minimal. If we are really serious about this, we have to really invest in the enforcement and the education around it. Those are really critical issues.

Q154 **Ian Byrne:** To follow up on that, would it be better to invest in the national ability to grow trees in the UK?

Robin Gray: I will let Darren speak on this one, but UK Sourced and Grown is really about promoting that capacity here—and why not? Why would we not want to promote it here?

Dr Moorcroft: One of the things that Government can do is show commitment to the nursery sector by saying that they want to source their trees from the UK and they want them to be grown here. That certainty, as I believe you have heard from other witnesses, will allow them to invest. One of the benefits that I mentioned with regard to the England trees action plan was the investment of £21 million into nurseries and capacity. If that is used well, we can see a step change in the number of trees that we are able to provide.

One of the things that the Woodland Trust did when we first instigated UK and Ireland Sourced and Grown was provide contracts for those nurseries to provide that certainty. In doing so, you give them the willingness and ability to invest and create rural economy contributions across the UK.

Another great thing that we need is more nurseries supplying in different parts of the UK. One of the reasons why we have 30 nurseries doing it, rather than one, is that you spread your risk, create greater and more beneficial provenance and ensure that you can optimise and maximise the supply that you have.

Ian Byrne: A fine answer.

Jill Butler: We have slipped back into numbers again, haven't we? Where did this big number come from? We have talked about this before. We want quality, and we know that those individual open-grown trees can do the biodiversity for us as well as the carbon sequestration and the beauty. They have 20 times as many leaves, so they are going to be sequestering so much more. We do not need as many.

On a planting scheme on one hectare of land, you have planted 1,100 trees as a minimum. If an open-grown tree is doing 20 times the amount of carbon sequestration as each of those, you only need 55 trees by comparison, as it were. Where is this big number coming from? It is being driven by a timber-producing recipe for what we want in the landscape. As I said right at the beginning, that is not going to address our biodiversity needs. It may be good forestry—and I am a chartered forester—but I do not think that it is achieving either our biodiversity or our climate change outcomes.

Q155 **Ian Byrne:** Just to finish, in the light of the 100% support for the need for locally based nurseries, Darren, what are your thoughts on the Forestry Commission's decision to close Wykeham nursery in North Yorkshire in 2022?

Dr Moorcroft: I do not know the full rationale for doing so, so I suppose I will answer on the way in which we have thought about how we need to supply trees. As I say, we spread our risk rather than consolidate it. The economies of scale that you can get by moving into one nursery are in no way offset by the fact that having more than one gives you a better risk strategy, particularly when we know that there are certain pests and diseases that will close a nursery for a number of years. I would hate to lose that capacity, particularly if all the Woodland Trust's trees were coming from one place.

Ian Byrne: That is a good answer. Robin, I do not know if you want to answer that, as you are going into your new job—I do not want to compromise you.

Robin Gray: You read my mind there.

Ian Byrne: That is fair enough. Jill, do you have anything to add on the planned closure of Wykeham nursery by the Forestry Commission?

Jill Butler: I would come back to the fact that we are not using natural regeneration. Yes, it is employment—I understand that—but we absolutely have to wake up to the big cause of a crisis of biodiversity and

a crisis of the climate. We have to adjust. I am sorry, but we need to have people doing the right thing in terms of our landscape. Okay, we may have to change our roles and build more in tourism. Take a look at what has happened at the Knepp estate. They have not dropped employment. Their employment numbers have gone up, but they have diversified into a different area.

Chair: Ian, you managed to get your nursery in. I think what we need to say to the Forestry Commission is that we should lead by example and that we need more home-grown trees. A previous Secretary of State, Owen Paterson, was very keen to grow more trees in this country because ash dieback was largely attributed to the saplings and seedlings coming back from the Netherlands. We need to be aware that we could have better biodiversity and better trees. Jill, and all of you, have made the point that it is very much about quality, not necessarily just quantity—we are being driven by that all the time.

All three of you have given us a really thoughtful session that will give us some really useful ideas to put in our report. We thank Jill, Robin and Darren very much for this afternoon's contributions. You may stay on the line and watch the next panel or leave us—whichever you choose. Thank you very much, all three of you, for your expertise and your answers this afternoon.

Examination of Witnesses

Witnesses: Melanie Baines, Jenna Hegarty and Emi Murphy.

Q156 **Chair:** We will go straight on to the second panel. Would you like to briefly introduce yourselves for the record, please?

Melanie Baines: Hello, I am Melanie Baines. I am representing UKELA. I am a member of the UKELA nature conservation working party and the public health and environmental law working party. I am speaking from the last remnant of the temperate rainforest in the west Highlands.

Chair: We look forward to hearing from you, and we hope the connection holds up.

Jenna Hegarty: Hi, I am Jenna Hegarty, deputy director for policy and advocacy at the RSPB. I am here to talk about the value of trees and woodland for nature and climate. I am keen to get stuck into the questions.

Emi Murphy: Hello, I am Emi Murphy. I am the nature campaign lead representing Friends of the Earth. I led the trees campaign at Friends of the Earth, which was a campaign to double UK tree cover. That might sound ambitious, but it is also possible; I can talk about that later on in this session. I am happy to be here.

Q157 **Chair:** Thank you very much. The first question is to all of you: does the England trees action plan include the right measures and incentives to reach net zero or are there risks in the Government's strategy?

Jenna Hegarty: Separating the ETAP from what the Government's strategy is in this space is quite an important distinction. I am not sure that there is a sufficiently coherent Government strategy for tackling the climate and nature emergencies together, and it is vital that they be tackled together so that we maximise co-benefits and avoid perverse outcomes.

We absolutely need more carbon-rich habitats, including native woodland, but it is really important to recognise that a focus on planting more trees is not a silver bullet either for the climate crisis or for the nature crisis. There are risks from delivering it badly: there could be really significant further harm in terms of our climate mitigation objectives, but we could also exacerbate ongoing species decline. Nationally—and this is obviously a devolved issue—we need a much bigger-picture perspective on the actions we need to take to tackle the nature and climate crisis. Nature-based solutions, including through more native woodland creation, are a really important part of that.

In addition to the rapid decarbonisation that has to take place, we need to fully protect the natural carbon stores that we already have. We need to restore and manage them where that is needed—a lot of them need pretty rapid restoration—and to extend and pursue creation. Creation on its own, through the lens of woodland creation targets for example, risks focusing on one habitat type and risks perverse outcomes. That could undermine the protection, restoration and expansion of other priority habitats.

Q158 **Chair:** Thank you very much. We have to keep the answers a bit tighter if we can, but there was some very good stuff there

Melanie, from an environmental law perspective, do you think that the trees action plan is going to deliver? How do we balance the net zero ambitions with making sure that we have greater biodiversity?

Melanie Baines: I agree with Jenna; I do not think that trees should not be seen as a carbon solution. They store CO_2 in all parts and in the soil as well, but it rather depends on the type of tree you are planting, where it is and what the growing conditions are.

Quite a nice, easy stat is that one tree takes out one tonne of carbon dioxide over 100 years, but each person in the UK is producing 10 tonnes of carbon dioxide over one year. An awful lot of trees are going to need planting, and I question the ambition of the tree strategy and the action plan to do that.

There is an awful lot of "we will" in the action plan, but lots of things are not in place. If you are going to plant trees, it is not just about putting them in the ground; it is about making sure that all the infrastructure and

all the necessary conditions like workforce, education and skills are there as well. A number of the initiatives in that plan—I have counted about 10—are not yet in place.

There is a real danger of increasing carbon emissions if you rush to put trees in the ground too quickly. It could have negative effects on biodiversity, land and livelihoods. I just do not think that we are ready to achieve this massive planting in the timescale that is planned. Was that quick enough?

Q159 **Chair:** I am interested in the figures that you gave us. Am I right in saying that a tree captures one tonne of carbon over the whole 100 years, or was it one tonne of carbon a year? People create 10 tonnes of carbon dioxide each year, but what was the figure for the trees?

Melanie Baines: It was one tonne over 100 years. I am quoting—I hope she does not mind me saying—Dr Sarah Clement from Liverpool University, who is an expert on nature-based solutions. That was on the BBC World Service or something, so they are not my figures.

Q160 **Chair:** I have learned something this afternoon, so thank you very much for that.

Emi, you call for a target to double England's woodland cover. How can it be achieved as you suggest without an impact on priority habitats, designated sites or valuable farmland? How do you see us getting that balance right?

Emi Murphy: First, I want to agree with what Melanie and Jenna were saying about it not being a silver bullet. This has to be a part of a package of ways to reduce emissions alongside increasing tree cover, which goes beyond tree planting. At Friends of the Earth, we are calling for a doubling of tree cover in England, in this instance, with the ETAP.

There are couple of things that I want to say before going into where we could be planting trees or increasing tree cover. More generally, while it is good to have a target in place now, the England trees action plan is very much a short-term target. We need a much more long-term target if we are going to be serious about tackling both the climate and the nature emergency. At the moment, we are just not seeing that at Friends of the Earth, although we welcome the fact that next year the Government are planning to set a long-term tree target, which is fantastic, and that there will be public consultations. We hope that it will be ambitious enough and that it will come very soon, because we are running out of time.

When it comes to doubling England's tree cover specifically, we have done a lot of research and mapping of where this could be going. As you were asking, we are proposing that tree cover be placed on grade 3b or grade 4 agricultural land. We have got this data from Natural England's ALC mapping and the Forestry Commission's national forest inventory.

If we focus on grade 3b and grade 4 in particular and partly on grade 5, some of which has peatland on it and some of which does not, by the calculations that we have done at Friends of the Earth we can slightly more than double tree cover within England without impact on priority habitats and without planting over peat bogs, SSSIs or high-value arable land. Those are the things that we are proposing through the research and data that we have gathered, which come from open-source data, particularly from the Government. I emphasise that it is possible and it will not impact valuable farmland, priority habitats or the other things that I have listed.

For example, there is potential with green belts around towns and cities. Not all of it can have increased tree cover. I am always wary of saying "tree planting" because we do not just mean tree planting—we can have natural regeneration and so on—but you could plant broadleaf trees near towns and cities, for example. You could perhaps populate tree cover that way on grade 3b, grade 4 and partly grade 5 land, which Natural England has helpfully mapped out for us as well.

Q161 **Chair:** I think part of my question was about how we balance having enough trees planted, and keeping and increasing habitats, with maintaining valuable farmland. We have a finite amount of land in this country, and some of the numbers for tree planting are quite eye-watering. Are you convinced that we will be able to grow food and trees, or is it going to be just a combination of trees? Where do you see it?

Emi Murphy: I am convinced, because one of the big missing things within our discussion at the moment is agroforestry. That is one of the key things that farmers can embrace; they can use it as a method to increase tree cover on their land as well. We want to emphasise that at Friends of the Earth we want to work with farmers, and we have been working with them around agroforestry.

Building on the point about agroforestry, farmers need to feel that they have the right incentives to be able to do this. One thing that comes out of the England trees action plan is that it is not clear how much funding agroforestry has for farmers to be able to embrace and increase tree cover on their land. We totally understand that these incentives need to be in place for farmers to want to be able to increase tree cover on their land. That is the main thing, in answer to your question, Chair: alongside natural regeneration and tree planting, if farmers can embrace agroforestry—it is not all going to be on high-quality farmland—it is possible to increase tree cover.

One other thing to add is on hedges, going beyond trees. The roll-out of agroforestry could have very quick gains by doubling the size of hedges in the UK, for example. A lot more support is needed from the Government, particularly financially, for agroforestry to become one of the things at the forefront of increasing tree cover in England specifically.

Q162 **Dr Hudson:** I want to come back to a line of questioning that my colleague Sheryll put to the first panel about the right tree in the right place. You have already touched on some of these ideas in your initial answers, but nationally, do we know which are the right trees and the right places to plant them?

Jenna Hegarty: A big part of getting to "right tree, right place" is approaching tree targets in a sensible way. Those targets should be subsidiary to legally binding nature targets in the round, because then you are taking it in a holistic across-the-piece perspective.

"Right tree, right place" is incredibly reliant on the data—it is really data-hungry. Soil type, existing habitats, species assemblages on the site or nearby and the species of tree itself are key factors in determining what the right tree in the right place is. We have some of that data, but not all.

We have done some carbon and nature mapping work at the RSPB, and we have identified that areas of high carbon value, particularly due to soil type, correlate significantly with areas of high value to nature, and that about 66% of carbon in nature-rich areas lies outside protected areas. We cannot rely solely on the existing protected areas network, say, always to be a reliable factor in terms of where you could or should not plant.

Through the mapping work that we have done, we think that there is just enough lower climate risk soil—basically, not peat soils—in the UK to meet the Committee on Climate Change's high-ambition targets. Woodland expansion is often focused on soils that are at a higher risk from climate change. If we are thinking about land prices and where land prices tend to direct tree-planting approaches, it tends to be further up the hill where you have higher-carbon soils. That means that you have to take a really strategic approach to tree planting. To echo the evidence from the previous panel, you need to have site surveys as well to determine what is there on the ground.

Dr Hudson: In the next part of my question, I am going to get on to what we need to do to make sure we get it right, so we will come back to that.

Melanie Baines: I agree with Jenna. We need the sort of high-level national mapping that the RSPB has done. We need to draw red lines, certainly around blanket bogs, lowland raised bogs, peaty soils, carbon-rich soils and the margins as no-go zones, because the amount of—

Q163 **Dr Hudson:** If I can interrupt you, Melanie—we will come on to what we need to do to make sure we get the right trees, but my question is really whether we know which are the right trees and the right places. We will get on to how we find that out, but do we currently know?

Melanie Baines: I am not sure that we do. We know where the high-carbon areas are, the peatlands, because Scotland has a database,

"Scotland's soils", which grades carbon-rich areas and suitability for planting trees. It goes from 1 to 7, 1 being the ideal place for planting trees and 7 being the least. That is not necessarily taking into account other land uses, though. As Jenna said, you have to look at the individual catchment area or the particular place where you want to plant.

I think the strategy is saying, "We will improve the decision making on tree planting when the map data is completed in 2024", so we have a while to wait for that yet. My concern is that the rush to plant trees will mean that we are going to end up putting them in the wrong place if we are not careful.

Q164 **Dr Hudson:** Thank you very much; that is really helpful.

Finally, Emi, in your answer could you touch on whether we know which are the right trees? We have focused a lot on the place, but what about having the right trees as well?

Emi Murphy: I touched on mapping in my previous answer, so I will not emphasise that. Our position is a mixture of broadleaf and conifers, with an emphasis on "mixture", but we most definitely lean towards making sure that these are native trees. In the previous panel, the Woodland Trust talked about how these trees should be sourced from the UK and be native trees as much as possible, to avoid pests and diseases and so on.

The reason why we say "broadleaf and conifers" is that it will be a combination. Broadleaf trees take a while a grow, but they support biodiversity and create lovely ecosystems—the oaks and what have you—while conifers grow a little more quickly. Can we find the right balance between them, for example by making sure that we place broadleaf trees nearer to towns and centres, because they look a bit nicer and they support biodiversity? It is not just about increasing tree cover in the UK for the climate and nature emergencies; recently, access to nature has become a very big issue. Can we do both those things by using both types of trees?

Q165 **Dr Hudson:** Thank you; that is really helpful.

I will get on to the second part of my question, which is about what we need to do to make sure that we are doing this in the right way. You have talked about the benefits of biodiversity. In my part of the world up in Cumbria, one of the key benefits that we are looking at is potential flood mitigation through tree planting. We have talked about biodiversity; it could potentially complement some farming areas as well, and some folk will want to produce trees for the wood industry, so there are tensions in local communities about the right tree in the right place.

What, practically, can we do to make sure that we are getting this right and putting the right trees in the right place? What can we do to get this right? The tensions are there. We all want the same thing, but it is about the direction of travel. How do we get there?

Emi Murphy: Again, this is about the mapping we did with an emphasis on grade 3b, grade 4 and partially grade 5 land. We have also been using our mapping tool at Friends of the Earth to work with communities at the local level. This was referred to in the previous session by a couple of the panellists: having the tools like mapping is important, but so is working with local landowners and communities who have that local knowledge and trying to marry both things together, because it is sometimes impossible to know with some of these datasets.

That is really important, and there are some lovely examples across the UK where it is happening. In the Chew valley south of Bristol, for example, they are mapping areas where they can plant trees on sub-par agricultural land and working together in communities at that level.

My last point is about understanding the data gaps. For example, we have found out through our mapping work that there is not enough data from Natural England on species-rich grasslands. We need to make sure that we have as much data as possible, that we have the right data and that we know where the gaps are and try to fill them so that we can create a bigger picture at the national level while working with communities at the local level and with national datasets. Using local knowledge and national data, we need to increase tree cover as much as possible in the right places.

Dr Hudson: That is really helpful—so we need maps and we need data. It is all about the data.

Emi Murphy: Yes, and local people.

Melanie Baines: I am glad that you mentioned Cumbria, because I am a Cumbrian. I was going to reference Ullswater Catchment Management, which seems to be incredibly successful.

Dr Hudson: It is.

Melanie Baines: Farmers have to see a need for doing things. It is essential that we engage farmers—they are the managers of the land, particularly in Cumbria. Chris Rodgers, a professor at Newcastle University, has been working a lot on collaborative management.

Ullswater Catchment Management seems a very good example, and I have noted down a few things that they have done. As well as flood prevention after the devastating floods in 2015, they saw the need for tree planting in upland valleys, but they have also done things like landslip stabilisation on Place Fell and the Grizedale valley tree planting to slow the water from upstream.

If people see a need, things will work and organisations will come together. They seem to be working with the Woodland Trust, the Environment Agency, the National Trust, the Farmer Network, Natural England, the RSPB, Eden Rivers Trust and Cumbria Wildlife Trust. It is a pretty good achievement to get all those people together. You may know

more about that than I do, but it is essential to get collaborative management in catchments. Perhaps that could dovetail with the river basin management planning and that sort of thing. I do not know if that answers your question.

Dr Hudson: Thank you very much, Melanie. I promise the Committee that I did not tee Melanie up with that answer.

Melanie Baines: No, you didn't.

Q166 **Dr Hudson:** As you say, Ullswater Catchment Management is a really progressive and forward-thinking system. Working very closely with landowners, land managers and farmers, they are doing some great work. At the ground level, they are trying to get innovative projects together. Flooding is a big issue, but we also need to make sure that our farmlands are sustainable and fertile and that we have biodiversity. Thank you for flagging that.

Jenna Hegarty: I would build on everything that has been said. As well as a strategic approach to this, you need site survey data, particularly to identify undesignated habitat, because there could be plenty of places that look perfect from a national mapping perspective, but when you get on the ground they are not. We have to be able to make those decisions based on the data.

This was talked about by the previous panel, but we need to take into account the role of buffers in the appropriate context. If there are ground-nesting bird populations in the area, you might need a buffer away from new planting of 500 metres to a kilometre. For hydrological impacts, it might be 100 metres. The regulatory protections are really important, as is having the right impact assessments. The role of EIA is really important here and we still have some concerns about the changes that were made to thresholds in previous years.

Again, I echo what has been said about a mixture of approaches. There is a role for natural regeneration and agroforestry as well as the planting schemes themselves. This is not one size fits all. Part of it is about commercial forestry doing more for nature. #the Public Forest Estate is an exemplar in producing timber for the market but also doing way more—and it can do more—for nature.

Part of doing "right tree, right place" is also addressing "wrong tree, wrong place" from previous planting pushes. This is about taking trees off peat where they are there and it is about heathland restoration. There is a real risk in the push for numbers at the moment that other habitat types that are incredibly valuable for carbon and for nature, are essentially being overlooked. We have a very recent example where a conifer plantation burned down on a previous heathland site. It was the perfect opportunity to do some heathland restoration, but it was really quickly restocked with conifer. There are missed opportunities like that.

Dr Hudson: Thank you all very much; that is really helpful. Chair, you had people banging the drum for Devon earlier on, so it is only right and proper that Cumbria had a shout-out as well.

Q167 **Chair:** Yes, it is only right that Cumbria has its fair shot. There was a part of my question that I did not ask you all: how well does it appear that biodiversity will be supported under the England woodland creation offer and under the ELM schemes? Could all three of you just give me a very quick answer?

Jenna Hegarty: The short answer is that it is not clear enough yet. In the nature for climate fund scheme, it is not clear enough. There are risks that it could end up being spent more on commercial forestry, essentially, rather than native woodland, which brings biodiversity and carbon benefits.

On the ELM schemes, again it is in development. One thing that is quite concerning is that ELM is nowhere near as progressed as it needs to be to give landowners and farmers the certainty to apply with confidence and to deliver trees that are doing a multi-purpose job for public money for public goods. As a principle, anything that the Government are paying for should absolutely be about supporting what the market does not provide satisfactorily.

Chair: Thank you very much; that is a very comprehensive answer. Melanie or Emi, would you like to add to that quickly?

Melanie Baines: I cannot add anything to that.

Chair: You are largely in agreement, are you? Excellent.

Emi Murphy: I would emphasise the need for financial incentives for landowners to support biodiversity through increasing tree cover and not to be penalised for unmanaged areas. For example, if they are doing natural regeneration that is supporting biodiversity, it should not have negative repercussions on that. Again, building on the funding point, it is important to make sure there are annual cash flows rather than up-front costs from Government so that they are sustained over many years in trying to increase biodiversity on whatever land they want to do that on.

The last point, which the previous panellists touched on, is that we need to increase tree cover, yes, but also protect ancient woodlands and existing woodlands, because they absolutely have as much biodiversity; in fact, they are packed with biodiversity, and they probably will be more so until these little saplings grow. How we are going to protect ancient and existing woodlands is missing from the planning reforms that the Government are pushing in their White Paper. That is as important.

Chair: Thank you. It is very good to get that on record.

Q168 **Mrs Murray:** Can I turn to the forestry approval processes? This question is really for Jenna and Melanie. The Government are looking to streamline

the regulatory process for tree planting. Is this necessary?

Jenna Hegarty: I suppose you will recognise our caution, because streamlining is often code for something else. In this context, given how comprehensively both panels have highlighted the risks of getting tree planting wrong, what is needed is a really robust framework to do that in so that we are not, by accident in some cases, doing things that are harmful for the climate and nature. The regulatory framework is key to that.

I do not think that there are any places that we would point to where regulatory downgrading would be beneficial. In this context, the UK forestry standard—this was touched on by the previous panel—really is an essential minimum, and "minimum" means that there is nothing that could come out without unacceptable risks. We also think that a greater uptake of the UK woodland assurance standard is needed. This is about implementing well what we have, which speaks to resourcing from the agencies rather than barriers to do with the regulation and the regulatory framework itself.

Melanie Baines: I completely agree about streamlining. We had the Mackinnon review in Scotland, which went some way to streamlining the process. I have read the forestry standard probably cover to cover, and the thing that concerns me is that the grant approval process very much relies on the due diligence of the applicant.

From experience of my own and other local planting schemes, the forestry services, the conservancy and Scottish Forestry, which approved the grants, did not really validate what the applicant had said he was going to do and who he had contacted. I have to be careful about what I say, but I do not think that the community were involved at all in the process—they did not know about it. This is not an atypical case; there are several cases that I have heard of. We were just left out of the process.

You end up with a great big deer fence that prevents access to the hillside, and you realise that the soil where the trees are to be planted is the bottom grade for planting. Although the objective was carbon sequestration and storage, you are going to end up with more emissions, because it was being planted on peaty soils in an area of deep peat at 30 cm-plus. I found it very difficult to negotiate with the forestry, particularly about the complete miss of public consultation—the period had ended before anyone knew about it. I suggested that we went back and actually did it properly, consulting the community, but by that point the contract had been signed and there was no going back. As well as public access rights, there were lots of private water rights involved, with access and servitude rights that were ignored.

I do not feel like streamlining is necessarily a good idea. There needs to be more due diligence. Issue logs ought to be followed up. People need to

say who they have contacted and what the results of that were. There was no auditing.

Q169 **Mrs Murray:** The second part of my question is for both of you, again: how can we ensure that any streamlining of regulation does not lead to weaker environmental controls? If you could continue while addressing that part as well, Melanie, then we will come to Jenna after.

Melanie Baines: There needs to be more collaboration between the statutory authorities. They all have agreements. In Scotland, SEPA, NatureScot and the Forestry Commission have agreements about collaborating, but I did not find that particularly strong.

I looked at the Highland and Islands Conservancy applications for woodland forestry, of which there are probably hundreds, and not one was subject to EIA even though some were in protected areas. I find that quite worrying. I appreciate that it may lengthen the process, but it is very important not to actually cause emissions by planting trees. EIAs are often needed.

Jenna Hegarty: To build on that and emphasise a point I made a little while ago, if we look at past examples of work, we had high rates of UK forestation. They were achieved without adequate environmental safeguards, and the result was basically a poor result for nature, a poor result for carbon and in a lot of cases a poor result for timber, because a lot of it was planted in places where it just fell over and it was no good to anyone.

Anything that is about examining the regulatory framework in place has to be robustly evidence-based. Is that the issue that is preventing an expansion of positive woodland cover? To be honest, you could scratch the surface and it would be quite clear that it does not really stack up. There are massive opportunities to improve things like grant administration and payment speed to give landowners confidence to apply for these planting programmes in the first place.

This goes back to the previous point about mapping, data and everything you can do to create more certainty and a more complete picture. That is the stuff that paves the way for more streamlined decisions that are the right decisions.

Q170 **Robbie Moore:** My question is to all three of you about natural regeneration. What benefits does natural regeneration give compared with planting to reach our net zero target?

Emi Murphy: Natural regeneration, alongside tree planting, agroforestry and other methods, can be cost-effective and can reduce disease risk, as trees are populating themselves. Natural regeneration eliminates the need for plastic tree guards. One thing that I find interesting is that some shrubs that can look a bit gnarly actually protect saplings and new trees as they grow, which is what plastic tree guards would do—and a lot of them are single-use plastic. Woodlands are more likely to be healthier

because, again, we are allowing them to flourish on their own, and they can be more climate-resilient and good for biodiversity.

Alongside all the other methods, that makes a big case for natural regeneration. More funding is required on that in particular. The example of the Knepp estate used in the previous session shows the positive side of natural regeneration and the fact that it can happen on farmland or anywhere. It is always a really lovely example to point towards when we are talking about this.

Q171 **Robbie Moore:** You picked up on funding there. Could you expand a little on where you see more funding required for natural regeneration?

Emi Murphy: It seems that it is not fully clear under the England trees action plan where some of the funding will come to help support natural regeneration projects and methods, or under ELM. Is there a way that natural regeneration could be built into that to unlock some funding and support for landowners and beyond in natural regeneration?

Q172 **Robbie Moore:** What degree of certainty can natural regeneration give compared with planting to ensure that the climate change target can be met? How much reliance should we put on natural regeneration, as opposed to pure planting schemes?

Emi Murphy: We think that both have a part to play in this. For certainty around natural regeneration, we need a bit more research and a few more projects. The natural regeneration projects that have happened have shown that they can absorb some carbon and increase tree cover that way. It is something that we need to focus on right now, within the next five or 10 years, in order to allow for these trees and for this biodiversity to be generated. That is alongside tree planting.

Jenna Hegarty: It is interesting that your question was very specifically framed around the role of regeneration in contributing to net zero. I would just emphasise that it is as much about tackling the biodiversity crisis as it is about net zero. The Government absolutely have to view both of these together.

On natural regeneration itself, yes, it is really positive that it is now being recognised in the wider conversation about extended tree cover in the UK and in England specifically. For a long time, the conversation was focused on tree planting, and regeneration is definitely part of that mix. It can play a really important role in helping to buffer and reconnect existing woodland habitats. As Emi has covered, it can help to reduce the pressures of importing planting stock as well. It is something that we are using at a number of RSPB sites, where we are extending tree cover, including at Haweswater in the Lake district and Abernethy in the Cairngorms. It has a really important place.

We need to expand the evidence base, particularly on its carbon credentials. There is work under way by Natural England to look at that. It does need to be natural regeneration, as in from native species. There

are impacts from the self-seeding of non-native conifers, particularly in open habitats, that need to be addressed.

Melanie Baines: I agree with Jenna on the last point. We see lots of invasion of Sitka spruce around here. We also have lots of natural regeneration, but sometimes you need intervention. They have done a survey in Scotland that suggests that it has taken between 15 and 35 years to establish natural regeneration in an area where they have made the conditions more possible by fencing it off, not allowing sheep and managing deer.

I think it is cheaper. I read a paper on global rules for reforestation, and it can be—this was in Brazil—38% less costly. The same paper said that it can be 40 times more effective in terms of carbon sequestration, which is a higher percentage than if you were planting. Where possible, it should be encouraged. It should be near to forests. Most of it occurs within about 100 metres to 192 metres of an existing natural forest. You would need birds and animals as well. I believe it is higher in wetter areas, which is possibly why it works very well here. In terms of disease, and the amount of flora and biodiversity, it is by far the best method. There is better resilience to disease, drought and fire as well.

Robbie Moore: In that answer, you also touched on the benefits that it brings to achieving net zero by comparing it directly with planting, so thank you for that.

Q173 **Geraint Davies:** Can I ask Melanie again about net zero? What are your views on burning wood as opposed to using wood in building materials, perhaps in place of concrete and to a certain extent steel, so that we have ongoing wood storage instead of burning it?

Melanie Baines: I wrote something down about that, but I cannot find it now. Yes, I agree. Trees are just recycling carbon; they are not necessarily putting it back into the ground where it was. It is recycling, and they are on a fairly short timescale in terms of the millennia that the carbon was under the ground. If you are going to stop that carbon escaping again when trees die or decompose, it is important to try to use it instead of more damaging materials like concrete.

Q174 **Geraint Davies:** Presumably the quote from Dr Sarah Clement about the absorption of carbon by trees did not take into account the idea that you would then set fire to it and release all the carbon. In fact, when you burn trees the situation is even worse.

Melanie Baines: Yes. The quote that she gave was not necessarily about burning; it was just about the general production of carbon by various things that humans do. The point is that tree planting or any other form of carbon sequestration—for example in peat, seagrass or salt marshes—is going to be ineffective if we do not cut down on our energy use, our transport and our use of fossil fuels. One cannot happen without the other.

Q175 **Geraint Davies:** Can I turn to Jenna Hegarty from the RSPB? What do you feel the opportunities are for using more trees in building and not burning wood for energy, in terms of both climate change and public health? As you may know, a very high proportion of PM2.5 comes from burning wood in urban environments. Burning it at scale for energy is bad for public health and the climate.

Jenna Hegarty: I was delighted that you brought this up at the end of the last panel, because I wanted to specifically bring this in. Again, it goes back to the coherence of the Government's strategy on net zero and nature restoration in the round, with different Departments speaking to each other and having a shared approach.

A report that we did last year with WWF called *Riskier Business* looked at the UK's overseas land footprint based on seven commodity types, including timber. Timber imports have doubled since a previous version of that study in 2015. That is mainly due to an increased amount of bioenergy production. It just does not stack up on carbon grounds. Burning wood is carbon-inefficient. Burning wood for energy emits more carbon per kilowatt-hour than burning coal. The sheer amount of public money that is being channelled into this is phenomenal and, frankly, scandalous.

If we just take Drax alone, between 2012 and 2019 Drax has received over £4 billion-worth of subsidy, via the renewables obligation certificates and more widely. Up to 2027 it is expected to receive another £5.8 billion. You have vast amounts of public money, completely dwarfing what is being channelled through the nature for climate fund for example, paying for a form of energy production that is dirtier than coal and driving deforestation overseas. It is absolutely mad.

Q176 **Geraint Davies:** You mentioned £4 billion and £5.8 billion being spent on destroying the planet by burning wood. Presumably you would prefer to see at least some of that money spent on using wood in buildings as carbon storage in place of concrete, which if it were a country would be the 13th biggest emitter in the world. Would it be a good idea to put the wood in buildings instead of burning it?

Jenna Hegarty: It is definitely part of the mix. We need to spend that money well to drive emissions down through renewables that are in harmony with nature, and spend more of the money on nature-based solutions to climate change. We have a demand for timber in this country for a variety of things, including built materials. Locking that carbon up in long-standing buildings is a really good way of truly capturing that carbon for a long period of time.

Q177 **Geraint Davies:** Emi, from the point of view of Friends of the Earth, would you support the Government spending billions and billions of pounds burning wood? Maybe you would not be much of a friend of the earth if you did. Would you support that? Would you prefer to see us using wood in buildings as carbon storage?

Emi Murphy: I have nothing to add on this, but I can send something further in writing if you would like.

Q178 **Geraint Davies:** All right, that was short and sweet—thank you very much. In a nutshell, are you in favour of burning wood or putting it in buildings?

Emi Murphy: Friends of the Earth's position is to campaign against certain fuels, as Jenna talked about with Drax. I can send something further in writing, because this is something that I do not fully know.

Q179 **Ian Byrne:** I will direct this one to Melanie. How well is Government policy and funding supporting the management of existing woodland? Does the England trees action plan address any shortcomings?

Melanie Baines: I am not particularly expert on that, but I can see from the staffing levels in forestry and the support for Natural England that people who are meant to be checking the status of SSSIs are not being monitored, for example. I can only imagine that is due to underfunding.

Only 49% of broadleaf woodland is in active management. Having said that, a huge amount of forest is not in the public estate. It is the responsibility of the owner to monitor it, but the statutory bodies are meant to check on it as well, and that is not happening. More funding must go to nature conservation, including in the devolved regions, to help that.

Jenna Hegarty: We have more than 3.2 million hectares of existing woodland in the country. That greatly outweighs the proposed targets for expansion, and it is really vital that it is managed. Woodland needs to be actively managed to benefit wildlife in particular. We know that the breeding populations of woodland birds have declined by 31% in England, and a lot of woodland specialists have declined because woodland management is just not taking place to the extent required.

There is not enough there in what the Government have come out with recently. What is needed is sufficient long-term certainty around funding and expert advice to ensure that the management takes place. Your previous panellists talked about planting and running. It is about planting and managing, and part of that is promoting the woodland wildlife toolkit, which is a really brilliant resource that is geared towards getting the best out of woodland.

I have touched on it before, but greater promotion and uptake of the UK woodland assurance standard would be a really great means of helping better management. Again, there is not really much being said in that space.

Ian Byrne: Thanks for that—good answer.

Emi Murphy: I would just emphasise that funding and expert advice are incredibly important so that we are maintaining woodland alongside

increasing tree cover via various methods. Alongside that, as I said, we need to make sure we are fully supporting farmers and agroforestry with funding.

In addition, one thing that has not really been mentioned so far is ensuring that we are providing funding for local authorities as well. We have worked with councils in the last couple of years and they are vital to deliver on these solutions and to tackle the nature and climate crises—we had a rural council last year, for example, that committed to doubling tree cover on its land through its tree strategy, including through natural regeneration—but we need to make sure that they are fully funded to deliver on this as much as possible.

Q180 **Ian Byrne:** Good answer. You have all expressed concerns about the planning system and the proposed reforms. How much of this is a problem for the protection of ancient trees and woodland?

Emi Murphy: It is more about the lack of sufficient detail within the planning reforms and the White Paper. That is a cause of concern for us, because we do not know what protections are being retained, particularly as some of them are in EU legislation. It is very unclear to us what exactly is being protected. We hope that the existing regulations that we have had for many years will continue to apply. As I said earlier, there was not much on ancient woodlands at all and how we are protecting these existing woodlands. That has been the missing piece in all this: when we are talking about increasing tree cover, making sure we are protecting as much as possible.

I do just want to flag the six tests that Friends of the Earth, the Woodland Trust and, from my understanding, the RSPB have listed as things we would like from these planning reforms. One of them is about protecting sites that are important for biodiversity and nature's recovery and requiring fit-for-purpose contributions for nature in all developments. That includes protecting ancient woodlands.

Jenna Hegarty: The national planning policy framework appears to give strong protections to irreplaceable habitats like ancient woodland, but there are substantial loopholes, which is very problematic. It says that "development resulting in the loss or deterioration of irreplaceable habitats…should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". The problem is that the footnote to that policy states that "infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills)" are wholly exceptional reasons "where the public benefit would clearly outweigh the loss or deterioration of habitat".

It is built into the system. Even though they are nominally protected, later on it says that anything that fits the bill of a nationally significant infrastructure project, for example, automatically outweighs its importance as an irreplaceable habitat, which is incredibly problematic.

Ian Byrne: It is concerning. Good point.

Melanie Baines: To go on from what Jenna said, there was an interesting piece of case law in June—Juden *v*. London Borough of Tower Hamlets—about a mulberry tree, in which the whole aspect of "wholly exceptional" was discussed. If you look at section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act, it is not about a balance when preserving listed buildings; it is about the presumption to preserve. There have to be really wholly exceptional reasons why you go against a listed building, but there is no legislation to protect trees in the same way—and yet paragraph 175(c) of the national planning policy framework is very similar to the policy protection for listed buildings. I would like to see ancient woodlands protected in the legislation.

Q181 **Ian Byrne:** How would we get the balance to enable development to go ahead without losing the protection of ancient woodland? Is it possible?

Melanie Baines: There are always alternatives to a development scheme. You can go round them. In terms of translocating biodiversity, ancient woodland is irreplaceable. It would take 100 years to replace it, which is an incredibly significant timescale. You either mean that it is irreplaceable and priceless or you do not. We have to make a decision as a society: would we rather have our ancient woodlands or would we rather get to London quicker?

Ian Byrne: That is a really good answer.

Jenna Hegarty: Sadly, we do not have that many irreplaceable habitats left, so we should be protecting them fully. They are remnants, basically. There is developing momentum behind and content within the biodiversity net gain concept. That has real potential for when development takes place to ensure that biodiversity in the round is better off, but you absolutely cannot claim that where irreplaceable habitat like ancient woodland is lost. You just have to be really clear what it is you want.

Melanie Baines: The whole discussion around need is interesting. Does housing need override irreplaceable habitats? That is another discussion that needs to be had. How much of brownfield land is being looked at in terms of housing development? Perhaps we should be building up again rather than across, but that might not be popular.

Jenna Hegarty: It is absolutely possible to build really great houses for people in developments that are really positive for nature as well. We have an amazing partnership with Barratt Homes. You can have both.

Emi Murphy: I would add two things. First, we need to protect existing areas when it comes to looking at development proposals and make sure we continue to properly scrutinise them.

My second point links to the lack of clarity over EIAs. Will they be kept within the planning reforms to make sure that development does not

have a significant impact on the environment? Then there is the strategic environment assessment around making sure that local plans and development strategies contribute to environmental improvements, which means trees, woodlands and so on. Will those two things be kept within the planning reforms when they are streamlining these processes? They are important things to continue to have so that we are protecting nature alongside development.

Ian Byrne: Excellent answers.

Chair: I echo your comments, Ian: we have had some great answers to our questions this afternoon. With tree planting and woodlands, it is very important that we create the right trees in the right places with the right space and the biodiversity and everything that goes with it, let alone holding carbon. You did not talk much about flood mitigation and other things, but tree planting is so important. There is also woodland: how do we develop and make much more of our existing woodland?

This has been a really good session. Melanie, Jenna and Emi, thank you very much for your evidence. It will be great for our report.