

GOVERNMENT TREE-PLANTING STRATEGY AND TARGETS

October 2020

1. Are the Government's tree-planting targets ambitious enough and realistic?

Given that actual tree-planting is currently running at around a third of the annual target, being more ambitious still would seem to be pointless. While aiming high has its merits, there is little point in setting the country up for spectacular failure. Any target is going to be arbitrary, and the current one is as good as any. Time will tell if it was realistic or not!

2. Are the right structures in place to ensure that the tree-planting target is met?

Self-evidently not. To date the CAP-based agricultural subsidy system rewards only land available for some form of farming. Most of the potentially available land for new woodland is currently farmland attracting annual payments per hectare through the Basic Payments Scheme. Planting woodland disqualifies the land used from annual agricultural support payments, while Natural England's (formerly the Forestry Commission's) Woodland Creation Grant is a one-off payment only. This means that tree-planting is in the main only carried out by personally wealthy landowners who do not need an income from their land.

The new **Environmental Land Management Scheme**, currently under development, represents an opportunity to put right the deficiency, but only if it is adequately resourced and if its eventual format stays faithful to the original vision. The concept of "ecosystem services" gives some definition to the outcomes for which the taxpayer will reward landowners. In the case of woodland these services are primarily:

- Carbon sequestration
- Diversity of flora and fauna
- Downstream flood mitigation
- Rainwater filtration
- Human wellbeing

Evidence to date is that it will be under-resourced and will stray a long way from the original vision. Two pieces of such evidence are:

- The drastic reductions in staff over recent years at Natural England and the Forestry Commission, the two agencies needed to carry out consultation, advice and enforcement.
- The recent ELMS consultation document (<https://consult.defra.gov.uk/elm/elpolicyconsultation/>) which suggests that Tier 1, the level aimed at the vast majority of farmers, will be actions-based (instead of outcomes) and self-reported, not inspected.

3. How effective is the co-ordination between the four nations on forestry issues?

I am not qualified to answer that question.

4. Why were previous ambitions for increasing tree planting in England not met, and what lessons should be learned?

See my answer to 2 above. In addition public funds should have been directed quickly at existing, established tree-planting organisations linked to agreed objectives and growth targets. To give you one example, Moor Trees (www.moortrees.org) in Devon would very much like radically to increase the number of trees that it grows and plants annually. Very soon after the last election Anthony Mangnall, Conservative MP for Totnes, was given a conducted tour of one of the charity's nurseries and briefed on the relationship between more paid staff and the number of trees it was possible to produce. To date no public funds have been received by this organisation, which is typical of those best able to increase tree-planting quickly. (See also Treesponsibility in West Yorkshire.)

5. In relation to increasing forestry coverage in England, what should the government be trying to achieve? For example, how should the following policy objectives be prioritised?

- Biodiversity and nature recovery (way out in front)
- Human well-being and health (significant potential savings to the NHS)
- Mitigating or adapting to climate change
- Creating opportunities for tourism and recreation
- All the others

You might expect climate change to be higher up that list, but the carbon sequestration effect of tree-planting is desperately slow to establish itself. Focusing too much on tree-planting for this purpose deflects attention from the much more urgent priority of reducing carbon emissions from human activity and consumption. In river catchments the natural flood management effect of tree-planting establishes itself more quickly, but there are still more effective measures such as re-establishing river meanders, releasing beavers, installing leaky dams and building rainwater bunds, as was done above Pickering in North Yorkshire.

In pursuing the biodiversity objective, the key words are: bigger, better and more joined-up, as advocated in the Lawton Report, "Making Space for Nature", of 2010. Trees need to be planted near other trees, not in isolated copses, to create viable wildlife corridors. Conversely they should not be planted over other forms of nature-rich landscape such as wildflower meadows.

6. Are the right policies and funding in place to appropriately protect and manage existing woodlands in England? How will prospective changes to policy and legislation affect (not effect) this?

This is not an area about which I know a great deal, but I would make one observation, and that concerns planning policy. The thrust of government policy towards an assumption in favour of development is bound to be harmful to the environment in general and woodland in particular. Inevitably the trees removed for development are mature, storing large quantities of carbon and supporting a diversity and abundance of plant and animal species. The planted trees which replace them will take decades to reach equivalence. The cavalier attitude to ancient woodland for a net-carbon-emitting infrastructure project like HS2 does not bode well for the future.

Statement on the status of this submission

Despite my position in Moor Trees, I am submitting this as a private individual, as I expect the Director of Moor Trees to make the charity's official submission.