

## Written evidence submitted by the National Trust (TPW0031)

**17 November 2020**

*With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.*

### **Introduction**

The National Trust owns and manages 250,000 hectares of land, with 26,000 hectares of this already under tree cover, including an important collection of ancient and veteran trees. As part of our net zero target for 2030 we aim to have 20 million additional trees across our land. Of this 1500-2000 hectares would be semi-productive, 7000-8000 would be traditional closed canopy woodland and the rest would be a combination of agroforestry, wood pasture, natural regeneration etc.

Increasing tree cover can result in multiple benefits. We believe that the most important are the benefits to the climate, to biodiversity and to people's wellbeing and enjoyment. In addition there may be benefits to flood risk, water quality and timber products, but these are second order benefits of increased tree cover.

Increased tree cover across the UK should be done in accordance with key principles that avoid damaging outcomes and maximise the benefits:

- existing trees and woodlands should be more strongly protected, including the completion of the Ancient Woodland Inventory and the proper implementation of the Planning Policy Framework in relation to ancient trees and woodland (and appropriate protection in future planning policy);
- the impact of increased tree cover in important cultural landscapes should be considered and treated sensitively;
- minimising the risk of pests and diseases from importing or growing tree seedlings and saplings and minimising the use of peat growing media;
- multiple approaches should be used including increased closed canopy woodland, natural regeneration and open tree habitats such as wood pasture.

Governments across the UK will need to introduce effective funding and policies to increase tree cover, including

- spatial mapping and prioritisation of the most appropriate places for increasing tree cover and using this to target funding and resources (it is likely that this will be best done within, near to or between existing areas of habitat or designated sites);
- introducing long-term contracts and grants to support markets for woodland ecosystem services;
- supporting farmers and land managers to overcome barriers (such as decreased land values and cultural factors) to increasing tree cover;
- investing in research and development as well as planning policy drivers to increase the proportion of building materials that come from UK-sourced timber.

*We are answering the following questions.*

## **1. Are the UK Government's targets for increasing forestry coverage, and tree planting, for England and the UK sufficiently ambitious and realistic?**

The UK Government has set out a welcome degree of ambition for tree planting across the UK as a whole. Increasing tree cover to 17% is in line with the recommendations of the Committee on Climate Change. However, it is not acceptable for the burden of meeting this target to be placed on Scotland, Wales, and Northern Ireland. While the UK Government may be able to state an ambition for the UK, delivery across the UK will be devolved. England should aim to achieve at least 17% tree cover itself in line with climate and biodiversity goals. This would help the UK to guarantee that it reaches 17% as a whole and may even help it to overshoot this, which would be of additional benefit to biodiversity, the climate and people. At present, the Government has set out an ambition for 30,000 hectares of additional trees in England by the end of this term. However, in order to achieve 17% or more cover, England would need to increase tree cover by 30,000 hectares or more (possibly in the region of 36,500 hectares) *per year* (instead of over four years) for every year from 2025-2050. We welcome the commitment of the NI Executive to plant 18 million trees over the next 10 years, which will go some way towards increasing tree cover in what is currently the least wooded part of the UK. The National Trust in NI has committed to planting 125,000 trees over this period.

England currently has around 10% tree cover and from 2018-19 only 1420 hectares of trees were planted in England. A rapid shift is needed in order to ratchet up tree planting and natural regeneration. However, this should be done in an incremental way (going from 1420 hectares at present to >30,000 hectares per year gradually). A jump straight to >30,000 hectares per year could be both unfeasible but also risk rushed decisions and risks such as inappropriate tree planting or the import of pests and diseases.

Increasing tree cover should result in a more wooded landscape and increase connectivity for species. There should also be softer edges between the farmed landscape and woodlands. This means that transitional and edge habitats (including hedgerows, hedgerow trees, and scrub should play an important role in the increase in tree cover).

The Government has also said that it wants to achieve 30% of land in the UK for nature by 2030, including 400,000 hectares of additional land for nature in England by 2030. This ambitious target must help to drive the delivery of an ambitious tree cover target in England. National Parks and Areas of Outstanding Natural Beauty can play a crucial role in meeting this target, but at present many areas of them are not in a good condition for nature. Much better on-the-ground management, greater resources, and more investment are needed to improve the condition of nature in these Protected Landscapes.

Targets to increase tree cover and planting should be achieved while meeting a number of conditions. Areas that are planted with trees, or allowed to succeed to trees, must not put at risk valuable open habitats. Increased tree imports should not risk the import of tree pests and diseases, and efforts should be made to rapidly phase out any use of peat compost to grow tree seedlings or saplings.

Alongside increasing tree cover, existing trees and woodlands should be protected from harm where possible and their condition for biodiversity and for people improved. There are instances

where important trees and woodlands, including ancient woodlands, have been harmed or felled for development. This should be avoided through the proper implementation of the National Planning Policy Framework and appropriate protection in any future planning legislation. Existing management of woodlands, particularly broadleaf woodlands in England, is lacking and means that they are dark overgrown, putting woodland biodiversity at risk. New markets for wood products could help to increase the benefits of these woodlands for people and wildlife. Hedgerows also form an extremely important corridor habitat for species and a carbon store too. New environmental management incentives should reward management of hedgerows that protects them from removal and allows them to grow.

We are not sure whether the term ‘forestry coverage’ is appropriate or if it is being used to describe all tree cover. Forestry often refers to productive forests that generate forest products. While increased tree cover in England and the UK will involve some new productive forests it must also include new closed canopy woodlands, natural regeneration and trees in open habitats (such as wood pasture). A mixed approach will be essential and not all tree planting or increases in tree cover will equate to increased ‘forestry coverage’.

In Wales, the Welsh Government has already published its Strategy for Woodlands and Trees, setting a target of 2,000 hectares per year from 2020 to 2030. This would be a marked increase on the 100 hectares per year at present, however it would only marginally increase tree cover in Wales from 15% to 16%. It would be ideal if all nations of the UK could aim to achieve 17% cover in line with the UK-wide target.

## **2. Are the right structures in place to ensure that the UK wide target for increasing forestry coverage is delivered?**

Because the targeted increase in tree cover is so significant, a range of approaches will be needed. One approach (for example natural regeneration) will not be appropriate everywhere. The Government has introduced a number of new structures and frameworks that could help to deliver increased tree cover (although again, we note that not all of this will be productive forestry):

- The new Nature Recovery Network and Local Nature Recovery Strategies can help to identify those areas where there is highest importance or potential for increased tree cover (with a benefit for biodiversity). Funding and resources should be targeted towards these areas. However, it will be important to ensure that this does not result in blocks of woodland but in connectivity across the landscape – Local Nature Recovery Strategies must be developed with an awareness of the landscape beyond the Local Authority boundaries.
- The new environmental governance framework for England introduced by the Environment Bill will include measures to hold government to account on its environmental progress, including annual reports on the delivery of Environmental Improvement Plans. Legally binding environmental targets may also set an ambition for habitat extent, quality and connectivity, all of which should be applied to tree cover as well as other habitats.
- The Glover Review has highlighted that National Parks and Areas of Outstanding Natural Beauty can do more to benefit nature. These areas, with existing boundaries and infrastructure, should be used to target public and private funding and effort to benefit nature. One element of this could be increased tree cover. In the Lake District National

Park, at Wild Ennerdale, we have worked with Forestry England and United Utilities to allow natural regeneration in the river valley. It is important to take cultural considerations into account in these areas. Increased tree cover can be controversial and inappropriate in some culturally valuable landscapes. However, the National Trust has had some success in increasing tree cover in the Peak District and Yorkshire Dales – both important cultural landscapes. Introducing trees in a more dispersed way throughout these landscapes, and debunking the image of visually harsh, intensive blocks of forestry can help to address visual and cultural concerns.

- The new Environmental Land Management system will reward environmental outcomes. Tiers 2 and 3 of ELM, which will include projects at a landscape or catchment scale, need to be allocated sufficient funding to drive these results. Government should institute multi-annual, independently determined funding for ELM.
- Increased tree cover can often be an element of projects or programmes to improve water quality or re-naturalise rivers. This in turn can contribute to adaptation to climate change by slowing rates of flow and reducing/delaying flood risk downstream. Increased Government spending and effort on Natural Flood Management could help to deliver an increase in tree cover as one element of these schemes. The National Trust has included tree-planting as a key element of some of its work to take rivers closer to their natural state, including at Holnicote in Somerset.

While many new sources of public money (including the £640 million Nature for Climate Fund) and policy frameworks exist, the Government could go further:

- Any funding or policies from Government should be for the long-term (at least one or two decades) rather than enabling the status quo of low planting rates to continue. The scale and duration of Government funding will need to be commensurate with the long-term vision of the 25 Year Environment Plan.
- New markets should be supported or created to encourage private investment in increased tree cover. This could include reduced VAT for investment in nature restoration, an expansion of the Woodland Carbon Code for truly additional and rigorously assessed woodland offsets for carbon. The existing Woodland Carbon Fund and Woodland Carbon Grant are schemes that ensure increased tree cover through contracts for five or ten years. These are important schemes but private markets for woodland carbon (and other ecosystem services) that incentivise long-term change through long-term contracts and guarantees. The Government could also use underwriting or bonds to stimulate private markets for the ecosystem services provided by tree cover. The National Trust has worked with Green Alliance to develop the concept of Natural Infrastructure Schemes – markets based on reverse auctions of environmental outcomes (e.g. reduced flood risk) from landowners (e.g. farmers) to private beneficiaries (e.g. utility companies).
- Many barriers currently prevent landowners, particularly farmers, from increasing tree cover on their land; this includes reduced land values. The new farming system should use long-term environmental contracts (through Tiers 2 and 3 of the scheme) to support the conversion of land to trees (where this benefits people, biodiversity and the climate) and to support the inclusion of trees in a productive landscape (e.g. agroforestry). We are working

across our farmed estate to turn uni-functional farms into multi-functional farms and to explore how trees can deliver multiple benefits, including to tenants. At present trees are reserved for landlords and tenant farmers may not have the ability to choose to increase tree cover even where they may desire to do so.

- The use of timber from construction can help to deliver a long-term lock up of carbon. However, at present there are too many barriers to the use of timber as a building material. Some investment in research and development of new tree species/timber building materials may be required to meet the resilience standards of the building and construction industry and to deliver a step-change in the use of timber for construction in the UK.
- In Northern Ireland, while there have been some changes in public funding for trees and woodlands, more opportunities should be taken to support enhancing woodland cover and supporting long term maintenance of newly planted woods. Future agriculture support and agri-environment schemes should include support for tree and hedgerow planting and hedgerow management.
- In Wales there are concerns that Natural Resources Wales has a monopoly over the forestry sector and has mishandled contracts. This may be leading to a less productive forestry and timber market than may otherwise be the case.

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

In the future, we should aim to increase the proportion of tree species that will be resilient to future pests and diseases and to future climate change. Existing native broadleaf species are under stress from all of these threats and we should be open-minded about introducing species from the near-continent. A tiered system should be used, which prioritises species already in place. Under-represented native species, such as lime, could then play a bigger role. In areas where trees are already stressed (for example oaks in the southwest of England) native species from southern latitudes should be considered as part of a 'portfolio' approach alongside site native species of diverse provenance, as described by the Forestry Commission.

In the past, targets to increase tree cover have resulted in large areas of intensive plantation forestry or in Short Rotation Coppice/Forestry that has been used as a bioenergy feedstock. These may be the fastest route to sequester carbon, however they do not result in the same benefits to people and biodiversity as a much more mixed approach. In addition, any carbon benefits are highly dependent on the prior land use, and there is significant evidence that older, broadleaf forests can be as effective, or more effective, than plantations forestry at locking up carbon, particularly in the long term. Intensive plantation forestry has previously caused significant harm to peatland and blanket bog habitats and results in an overall loss in carbon. Even restocking with trees on these habitats is less beneficial to the climate than restoring them to healthy, functioning peatlands.

#### **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?**

- **Mitigating or adapting to climate change;**

- **Promoting biodiversity or nature recovery;**
- **Increasing biosecurity and plant health;**
- **Improving human well-being and health;**
- **Protecting natural and cultural heritage;**
- **Food security;**
- **Creating commercial opportunities from forestry, tourism and recreation; and**
- **Any other priorities?**

The National Trust's view, and its aspirations in its own targets to increase tree cover, is to deliver for climate change, biodiversity and people's recreation and other opportunities to improve their wellbeing. Therefore, these should be the prioritise of increasing tree cover. Protecting natural and cultural heritage, and increasing biosecurity and plant health should not be objectives of increasing tree cover, but should be key criteria that all tree planting should meet during its delivery.

Benefits such as timber, flood alleviation and water quality should be viewed as secondary benefits alongside the primary benefits of climate change, biodiversity and people's recreation and wellbeing. Policy should encourage consideration of potential secondary benefits that can be achieved by individual planting schemes and seek to maximise overall public benefit from tree planting in the course of delivering on the primary objectives.

## **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 this?**

In England, existing policies to protect habitats include planning protections for Sites of Special Scientific Interest and even stronger protections for those sites designated as SPAs or SACs. In the future, including in any changes to the planning system, existing protections should be maintained or strengthened. Existing exclusions for these types of site from Permitted Development should be maintained. Any new Protected Area in the planning system should include SACs, SPAs and SSSIs as well as Green Belt. However we are concerned that the introduction of a single 'Protected Area' may be a blunt instrument. In addition, many sites of importance for habitats or biodiversity are not properly mapped or monitored, particularly Local Wildlife Sites and Priority Habitats. In order to properly protect habitat and biodiversity, Government must invest in filling data gaps and proper monitoring of these sites. This will require increased Government investment in environmental data, which could be delivered through a November 2020 Spending Review. The completion of the Ancient Woodland inventory would be a crucial step in ensuring proper protection for trees and woods in England.

Tree lined streets should be protected in any planning changes, and it is positive to see proposed changes to the planning system refer to increasing tree lined streets. However larger areas of green and blue space should also be a planning ambition in urban areas where they can provide important benefits to people, the climate and biodiversity.

*November 2020*