

Written evidence submitted by National Parks England (TPW0042)

Introduction

1. National Parks England (NPE) is the umbrella body that brings together the views of the nine English National Park Authorities (NPAs) and the Broads Authority. As Authorities we have a significant role as place shapers, working alongside our rural communities and welcome the Committee's inquiry.
2. A number of political and policy imperatives mean this is a pivotal time for policy for trees and woodlands. The climate emergency; the restoration of nature, the need for a green recovery that stimulates long term jobs; and ensuring decisions over land management and woodlands continue to provide a range of public benefits are all key. We welcome the Committee's desire to learn from past lessons and to balance the drive to plant more trees with the many other benefits for health, nature, and the economy derived from more wooded landscapes, both urban and rural.
3. Tree establishment and woodland management require by their very nature a long term approach to land management. The National Park Authorities are similarly focused on the long term health of the environment and their local communities, and bring almost 70 years of experience to these debates. There has been much public interest in the development of the Government's Tree Strategy, that we welcome. We set out the collective aspirations of the National Parks for the Tree Strategy below before responding to the specific questions posed by the Committee's inquiry.

National Parks' Aspirations for the Government's Tree Strategy

4. The Government's forthcoming Tree Strategy has a crucial role to play in supporting nature recovery and tackling the climate emergency. Below sets out what National Parks England hopes to see in it and the important role that Park Authorities can play in its delivery.
 - a) **The Strategy should celebrate the many benefits of wooded landscapes;** of trees and woods; and value adopting multi-purpose management of woodlands and forestry. Consistent with the National Parks England–Forestry Commission Accord we would like to work with FC to ensure woods and forests in England's National Parks are at the forefront of sustainable forest management.
 - b) **National Park Authorities have ambitious plans for new woodland creation,** good links with their local communities, and are enablers for new woodland planting. The Strategy needs to provide the resources and flexibility to NPAs to enable them to work with farmers and land owners to achieve an increase in woodland cover, using the *Right Tree in the Right Place* principles, that is accessible for people to enjoy.
 - c) **National Park Partnership Plans (and their equivalents in Areas of Outstanding Natural Beauty) should set the framework** for new tree planting and woodland management within protected landscapes. These plans are prepared collaboratively, and build on existing partnerships with Forestry Commission, Woodland Trust, National Trust, landowners, and a host of others. This would ensure plans are integrated with other public policy objectives, supported locally, and delivered.

- d) **National Parks and AONBs are diverse landscapes with a variety of opportunities and challenges.** In some landscapes there are significant opportunities for substantial areas of new woodland, in others places rare habitats, historic features or valued character and beauty may suggest more subtle planting. We want to work with Government to ensure the varying needs of the different protected landscapes, when it comes to woodland creation and ongoing management, are reflected in plans and decisions.
- e) **National Park Authorities have fine grained evidence to enable the most successful woodland creation plans to advance,** including sensitivity mapping and opportunity mapping. The Strategy should encourage FC to work jointly with NPAs on sensitivity mapping in order to supplement GIS tools with local knowledge and this finer-grained data.
- f) **The Strategy should adopt the Right Tree in the Right Place (RTRP) definition at its core,** for planting and replanting decisions within or affecting National Parks. This should be a theme running through the various funding streams for new planting. NPAs have enormous experience, trust and knowledge of working with and helping the land-owning community to come forward with proposals.
- g) **The Strategy will really help if it is long term and integrated with a wider analysis of how land use needs to change to combat the climate crisis.** We look therefore, for close links to the Peat Strategy, Nature Recovery Network, and evolving Environmental Land Management Scheme. All three should be based on actions which would be viable under accepted likely temperature rises. The Strategy should also reflect upon the implications of increased risk of wildfire and the need for a national wildfire strategy as we see ever increasing amounts of woodland burn year on year around the world, releasing their valuable stores of carbon.
- h) **The part that all trees play in the landscape needs greater emphasis in the Tree Strategy.** Hedges, orchards, wood pasture all contribute. The Tree Strategy should support management that facilitates natural regeneration and include this component within the metrics used to calculate increased tree cover. Natural regeneration is cheap, resilient, and can be an attractive component of the landscape. The Strategy and ELMs should also encourage wood pasture where this is appropriate.
- i) We'd like the Strategy to include a strong aspiration to grow timber that can be used in construction and other long term (150 years plus) uses that will help to **maximise the long term carbon fixation benefits of forestry.**
- j) We welcome the skills and jobs created by woodland creation and management, and would encourage the Government to include **clear pathways in the Strategy to increase those with the multiple skills required to deliver and manage multi-purpose forestry,** beyond timber production.
- k) **The Strategy should recognise the importance and incentivise woodland management not just creation.** There should be funding support (whether public or private) that recognises

the value of managing existing woodlands for the multiple ecosystem services that they provide.

- l) In order to protect against the importation of pests and disease, the Strategy should proactively **support measures that source and gather seeds from within Great Britain and promote the germination and growth of seedlings from this resource within local/UK nurseries.**
- m) In our experience **Woodland Creation Plans can be helpful to maximise utility from new planting and provide confidence to ongoing management.** Woodland Creation Plans set out the objectives for planting, the driving motivation, the implications of planting, and a commitment to long term management. Making them a requirement of receiving grant funding and sharing them with NPAs amongst others would be welcomed.
- n) **We would stress that the health and wellbeing opportunities provided by engagement with trees, woodlands and forests exist in urban and rural areas.** Accessing the woodland resource found within the countryside, and in particular the protected landscapes, provide untold benefits to society and opportunities to recharge and reconnect mind, body and soul.

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

5. The current Government target to establish 30,000 hectares of new trees each year for 25 years from 2025 equates to 750,000 hectares of new trees. The Forestry Commission's own 'Low Risk' map¹ for woodland creation has identified 3.2 million hectares of land thought to have minimal constraints for new woodland creation. Therefore, it would appear that in prioritising the low risk areas, there is more than enough land in which to meet the Government's tree planting targets without impacting upon existing natural, cultural and landscape sensitivities.

6. National Parks England is not in a position to comment on whether these national targets are sufficiently ambitious and realistic. We support the desire for increased tree cover and more specifically wooded landscapes in order to achieve a multitude of public benefits, including but not limited to the long-term locking up of carbon.

7. Woodland creation and expansion plans are a priority in the Accord² agreed between National Parks England and the Forestry Commission in 2018. The ten English National Park Authorities have committed to planting at least 11,000 hectares of new woodland within the next ten years as part of our wider nature recovery plans. This is within protected landscapes that cover 10% of the country's land area and already have 15% tree cover, 5% above the current national average.

8. Making sure the principle of '*right tree in the right place*' is central to the Government's Tree Strategy, and is adhered to by public and private sector bodies, will be key to ensuring the proposals are realistic and achievable.

¹ Forestry Commission – [Low Risk map](#). 2020

² The Accord was launched by Lord Gardiner in April 2018 and can be found [here](#).

9. The climate emergency that we face demands action by the whole of Government, the economy and society. Increasing tree planting has an important role to play, but it is not a panacea, and done without regard to other public benefits, can in fact be damaging as history has taught us.

10. The Forestry Minister Zac Goldsmith has said that trees should not be considered merely as “sticks of carbon” and National Parks England would agree. We need the drive to net zero to be embedded in all sectors of the economy and public policy, and new woodland creation to be undertaken in a carefully planned approach if it is to maximise the multiple ecosystem services that it has the potential to deliver. We welcome the production of national standards such as the UK Forestry Standard and UK Woodland Assurance Scheme but these can only be effective if sufficient resource is set aside to promote their use and ensure compliance.

11. It would appear from the language used that much of the focus of both the England Tree Strategy and indeed the EFRA inquiry on ‘Tree Planting and Woodlands’ is on the physical act of humans planting trees. The reality is that across the country significantly more trees germinate through natural regeneration on an annual basis than are physically planted. The problem is that the majority of these fail to establish because they are either mown, ploughed in, grazed, weeded out or generally find themselves establishing in the wrong place.

12. National Park Authorities believe that there is a significant potential to establish individual trees, groups of trees or indeed entire new woodlands through the process of natural regeneration and recognises the importance that natural regeneration can play in maintaining the biodiversity and ecosystem services derived from areas of permanent woodland such as the network of ancient semi-natural woodlands. Authorities are aware of the increasing interest in a ‘Nature First’ approach to land management, and whilst not for everyone, we do recognise the role that this approach may play in delivering a more wooded landscape, relatively gradually through natural regeneration. We accept that woodlands created through largely natural processes will in the main, meet a greater range of national park purposes, better meet public expectations while still delivering significant long-term environmental benefits.

13. We would welcome the EFRA Committee seeking greater clarity as to whether the Government’s target of reaching 75,000 acres of trees a year by the end of the next Parliament³ includes areas of trees established by natural regeneration as opposed to physical planting? If so then how are these areas to be captured as the Forestry Commissions current monitoring approach⁴ focuses on funded planting schemes and does not mention areas set aside to promote the establishment of trees through natural regeneration?

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

14. Understandably, in order to meet the Government’s tree establishment targets, we have seen significant investment in the Forestry Commission’s resources in recent months. However, what we are not aware of is a similar investment of resource for the statutory consultees to woodland creation schemes. This begs the question as to whether we are about to see a significant increase in woodland creation applications being drawn up, only to have them potentially stall whilst they are formally consulted upon by the statutory consultees?

15. Have Defra and the Forestry Commission been working proactively with the statutory consultees to forewarn them of the impending increase in workflow and to identify solutions that will hopefully alleviate any foreseeable log jam from occurring in the future?

³ [The Conservative and Unionist Party Manifesto 2019](#). (p43).

⁴ [Government supported new planting of trees in England](#) - Report for 2019-20

Question 3 - How effective is the co-ordination between the four nations on forestry issues, including biosecurity, plant health and other cross-border issues?

16. National Parks England represents the ten English national parks but tree and woodland specialists working for the UK national parks do share knowledge, ideas, experiences and training opportunities through a collective Trees and Woodland Officers Group. The importance of knowledge sharing is well recognised across the national park family and takes place via numerous specialist groups.

17. With reference to biosecurity and tree health we would welcome more emphasis being placed on measures that source and gather seeds from within Great Britain, and promote the germination and growth of seedlings from this resource within local/UK nurseries, thereby helping avoid the need and reliance of having to import stock.

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

18. The last significant drive for increased tree planting and afforestation was seen in the 1970s and 1980s and was underpinned by strong supportive financial incentives. Whilst there can be little doubt that this focused minds on new planting, the failure to consider the environmental implications of the new planting led to numerous instances of planting taking place in the wrong place. Areas of deep peaty soils were affected; damage to the character of nationally important landscapes and wildlife habitats, and ultimately to high profile campaigns and public hostility. Indeed the need for a UK Forestry Standard was recognised and welcomed by many. In some of our national parks, we are still in the process of rectifying these mistakes that were previously made – such as widespread drainage of our uplands and this has and will continue to be a part of the nature recovery approach. It is important that, in the drive for increased tree cover, that we learn the lessons and do not repeat the mistakes from the past.

19. There are a number of reasons why planting targets have not been met more recently. These include:

- competing incentives for the use of land, where there was a £200/ha BPS payment on farmland but nothing for woodland;
- the significant drop in value of planted land;
- planting costs;
- the impact of deer and grey squirrels;
- the need to improve understanding of woodland management within the farming industry;
- a concern that woodlands host badgers that could lead to increased risk of Bovine TB;
- regular policy changes leading to uncertainty for something that is by its very nature long term; and
- a need for improved join up between two separate agencies when it comes to giving advice on land management through agri env schemes (Natural England) and woodland creation (Forestry Commission).

20. One of the most fundamental lessons is to ensure that the principle of ‘*right tree, right place*’ (RTRP) is embedded into the Government’s Tree Strategy; and into the policy and funding decisions that flow from it. Many refer to RTRP but National Parks England believes it is important that a definition is agreed, widely understood, implemented, and enforced. National Parks England has

prepared a definition as far as it relates to planting in or adjacent to National Parks (almost 10% of England).

The English National Park Authorities' Definition of 'Right Tree in the Right Place'

- *In English National Parks, when identifying or assessing the suitability of sites for tree planting/restocking and considering the appropriateness of species to be planted, the nature of their planting and their ongoing management needs, there is a presumption in favour of schemes that will conserve and/or enhance the natural beauty, wildlife and cultural heritage of the National Park in question, as expressed in the relevant National Park Management Plan.*
- *There is similarly a presumption against schemes that overall do harm to the natural beauty, wildlife and cultural heritage of National Parks as expressed in their respective National Park Management Plans.*
- *In meeting these requirements, schemes that also provide for public access and thereby provide opportunities for the public to understand and enjoy the special qualities of the National Parks are likely to be seen more favourably.*
- *In assessing the wider effects of any planting scheme, the potential social and economic benefits to the local community will also be taken into consideration, but this will not override the presumptions identified above since these benefits have already been factored into the Management Plans.*

21. We hope the Select Committee would endorse this definition (which is supported by additional background notes) for use in and adjacent to National Parks.

22. There are other lessons that we hope Government will draw on as it develops its new Tree Strategy. These are drawn from our successful experience of securing new woodland planting in highly sensitive landscapes by working with local landowners. In particular we would highlight:

- Recognising that the reasons for creating woodlands are many and varied and the landowner's objectives are key to delivery;
- Broad map based tools have a role, but must be supplemented by more detailed local knowledge of the area, landowners aspirations and on the ground site assessment;
- National Park Management Plans (and their equivalents in Areas of Outstanding Natural Beauty (AONBs) can be a useful mechanism to establish partnerships, integrate different policy objectives, and ensure support for new woodland planting;
- Woodland siting and design guides, have proved useful for designing woodlands that complement the existing landscape;
- the new Native Woodland in National Parks Challenge in the 1990s proved successful. Exmoor National Park, for example, created over 200ha over just a couple of planting seasons with the right incentives;
- National Park Authority and AONB Partnerships should continue to be key consultees on woodland creation proposals and their role in this respect should be strengthened;

23. We would welcome the Government's Tree Strategy championing the joint NPE/ FC Accord and encouraging its use as it relates to National Parks. The Tree Strategy should adopt "an M&S"

approach to planting in which best practice is common practice in protected landscapes in recognition of their designation. Given the scale of ambition for new planting it would be helpful to explore how officers (in Forestry Commission and NPAs) can demand better designed schemes.

24. Community involvement is very important. Currently public consultations on new woodland projects generally appear fully formed and with a fairly limited timescale to respond. Although processes for gaining approvals need to be straightforward and short, they do need to be comprehensive. Community support will have to be secured if Government hopes to meet ambitious woodland creation proposals – both inside and beyond protected landscapes. It may be constructive in landscapes of high woodland creation potential to engage in early consultation with communities to establish basic principles, both of design and process before detailed proposals are drawn up.

25. Well formed Partnerships and Forums can help bring organisations together and build trust and deliver better outcomes. The North York Moors National Park Authority, for example, has operated a Woodland Partnership group in the National Park and Howardian Hills AONB for more than 15 years. Whilst the Yorkshire Dales National Park Authority has had a Dales Woodland Forum that brings together the statutory bodies, FC, Natural England, as well as landowners, contractors, farmers, consultants, National Trust, Woodland Trust, Yorkshire Dales Millennium Trust and others. This forum has enabled the NPA and its partners to significantly increase the percentage of broadleaved woodland in the National Park by 2020, and the NPA are currently discussing woodlands of 60ha and 100ha. The Yorkshire Dales NPA's experience has been that well designed woodlands that build on the qualities of the existing landscape have taken place without undue concern from communities. This includes larger woodlands that will lead to landscape change. All of the woodland creation has taken place on privately owned land as the Forestry Commission does not own land within Yorkshire Dales National Park.

Question 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 and 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?

26. The Select Committee's question is absolutely fundamental and goes to the heart of the need to integrate, wherever possible, different policy objectives. This can be done at a policy level, but the benefits of achieving such integration (or alternatively the conflicts generated by not doing so) become much more apparent when one looks at individual places.

27. The Terms of Reference for the Inquiry refer to a number of policy objectives. National Parks England would add to this list – explicitly the contribution of woodland to landscape character. Enhancing this should be a public policy objective, in line with the 25 Year Environment Plan. Trees and woodland are an integral component of English National Park landscapes, providing vertical structure, texture, shape, colour and smell, features that collectively help define a sense of place. The annual show of autumn colours rarely fails to impress and the soft blanketing effect that trees have on the landscape presents a stark contrast to the geometrical shapes of the lowland field systems, rugged mountain peaks above the treeline or vast open expanses of the upland moors.

28. National Park Authorities are familiar with the need to manage land and water within the context of multiple and competing demands on that resource. The statutory purposes of National Parks and our accompanying duty cover variously biodiversity, landscape, cultural heritage, public health, recreation, and the rural economy. We know our landscapes, and our local communities well and therefore can bring together differing interests in a place shaping role. We hope that, at least

for 10% of the country, we might provide a blueprint for how to bring these interests together – and that the Select Committee will endorse a bigger role for National Park Authorities and the National Park Management Plans in future woodland creation planning.

29. Various sectors will need to come together to help achieve the Government’s ambitious targets and National Park Authorities are keen to play their part. To further develop their woodland resource hand in hand with nature recovery, the protection of natural and cultural heritage, improved opportunities for health and wellbeing and addressing both mitigation and adaptation to climate change. These priorities that the Select Committee have identified in the Call for Evidence are the same as those identified for National Parks in a recent Government commissioned Landscapes Review⁵. However, in terms of prioritising these within National Parks, should competing priorities materialise, then where those two priorities cannot be reconciled by skilful management, conservation should come first⁶.

30. The Select Committee refers to food security. If the national food waste issue were to be addressed, i.e. a 20% reduction as advocated by the Natural Capital Committee⁷ earlier this year, then this would go a long way to minimising conflict between tree establishment and national food security goals.

Question 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 effect this?

31. National Parks England welcomes the need to consider management of existing woodlands, not just the establishment of new ones. We would identify two major themes to be addressed – protecting existing woodlands and then securing their effective management.

Protect

32. National Park Authorities are planning Authorities and as such responsible for the issuing and management of Tree Preservation Orders within their respective areas, to protect specific trees, groups of trees or woodlands in the interests of amenity. Authorities believe that in general, the threat posed to individual trees or groups of trees by inappropriate development or deliberate actions, is significantly reduced as a result of the Tree Preservation Order process, when adequately resourced. Additionally, with offenders being liable for fines of up to £20,000 in the magistrates’ courts or unlimited in the Crown Court the deterrent is effective and appropriate in most cases.

33. With respect to the threat of pests and diseases to trees, Authorities are fully supportive of the need for effective biosecurity measures but believe more should be done to proactively support measures that source and gather seeds from within Great Britain and promote the germination and growth of seedlings from this resource within local/UK nurseries. Additionally, to minimise the effects and spread of pests and diseases, Authorities would welcome woodland creation schemes containing greater species diversity than is currently seen. UKFS compliant creation schemes containing 75% single species planted at 2,600 stems/ha, 15% other species planted at 1,100 stems/ha and 10% open ground, by management area, could actually be comprised of 92.2% single species by stem and only 7.8% other species by stem. England’s woodlands and forests are crying out for more species diversity which in turn will enrich the biodiversity and visual diversity of our wooded landscapes.

⁵ Julian Glover: [Landscapes Review](#) 2019

⁶ [Sandford Principle 1974](#)

⁷ Natural Capital Committee - [Advice on using nature based interventions to reach net zero greenhouse gas emissions by 2050](#): April 2020. (Annex 1, p19).

34. With ever increasing areas of forest and woodland succumbing to the effects of wildfire around the globe as a result of increased global temperatures and the climate emergency, National Park Authorities would like to see more being done to develop a national wildfire strategy. Increasing the area of tree cover across the country will, with global warming, increase the risk that forest fires occur. If we want to see the carbon locked up in usable timber or permanent woodland rather than released back into the atmosphere, then we need an effective national wildfire strategy to avoid the repeat occurrences of the 2020 Wareham Forest and Chobham Common fires that took out significant areas of trees.

Manage

35. National Park Authorities support the need for appropriate woodland management for all the benefits that this brings and have a good track record in promoting this. Forestry Commission data indicates that 75% of woodlands are being actively managed within English National Parks, compared to a national average of 59% in 2020. In Northumberland National Park the figure for 2019/20 was 94% in active management.

36. Clearly future arrangements through the introduction of the Environmental Land Management Scheme (ELMs) will have a significant bearing on how land-owners choose to manage their land, and the public benefits that are delivered. National Parks England is a strong supporter of the public money for public goods principle. All of the English National Park Authorities have been supporting Tests and Trails and we believe consideration for tree and woodland management needs to be integrated into the development of ELMs. A failure to do so risks policy on trees and woodlands being unhelpfully siloed which will not be helpful for landowners, public bodies, or the achievement of multiple public benefits.

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