

Written evidence submitted by the Wildlife and Countryside Link (LINK) (TPW0044)

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 58 organisations to use their strong joint voice for the protection of nature.

Executive summary

1. We welcome this inquiry, and its focus on the quality of woodland expansion plans. If the Government is to make a success of its tree planting programme, it must plan for the planting (or allow natural regeneration of) the right number of trees, of the right kind, in the right places. Only by getting the detail of tree planting programme right, and by ensuring it complements rather than damages other valuable habitats, can the Government unlock the climate, ecological, and social benefits that increased woodland cover in the right places can deliver. Woodland cover cannot and should not be divorced from overall objectives for nature.
2. In our response to the inquiry questions, we focus on four actions that would help make the tree planting programme a success:
 - Setting subsidiary targets, nested within legally binding wider biodiversity targets, to ensure woodland cover increases in tree-deprived England, as well as in other UK nations.
 - Establishing a coherent structure for delivery; comprising targets, a strategic spatial approach set by the Tree Strategy (developed to contribute to a Nature Recovery Network) with delivery and implementation on the ground guided by Local Nature Recovery Strategies, provided with sufficient resourcing for all aspects of this structure (including investment in better environmental data to inform planning and delivery, and alignment of grants, and emerging ELM priorities behind woodland cover objectives).
 - Adopting a holistic approach, focused on knitting woodland together with other valuable habitats to contribute to growing a Nature Recovery Network, from which further climate, economic and social benefits will flow.
 - Combining the expansion of new woodland with better and sustainable management of the woodland we already have, as well as a sustainable food and farming strategy.
3. As Wildlife and Countryside Link covers England, our response is England focussed¹. The challenges facing the tree planting programme in England are great – but so too are the opportunities. Expansion of woodland cover – achieved through planting and natural regeneration – must be ambitious in scale, combined with the protection and enhancement of

¹ When it comes to woodland cover expansion in Scotland, Wales and Northern Ireland, we believe that it is for devolved administrations to set their ambitions in line with Climate Change Committee recommendations, domestic climate and biodiversity targets and other land use considerations.

the woodland we already have, connected to the protection and expansion of other nature rich habitats through a Nature Recovery Network, and made publicly accessible. If this can be successfully achieved, new trees and woods will contribute significantly to a Nature Recovery Network, creating a redoubt for England's nature to recover in and to expand from, and deliver much needed health and wellbeing benefits.

4. Such an expansion of nature will provide significant ecological, climate, social, and economic benefits. The tree planting programme can be a powerful driver of these outcomes – if delivered in a manner that is ambitious in scope and holistic in approach.

Responses to questions posed by the Committee

Q1) Are the UK Government's targets for increasing forestry coverage, and tree planting, for England and the UK sufficiently ambitious and realistic?

5. The headline target to plant 30,000 hectares of trees per year by 2025 across the UK has potential to deliver for nature – but underpinning commitments are required to ensure that the full potential of this target, for climate, nature and communities, is realised for England.
6. With only 10% woodland cover (1.3 million hectares), England is one of the least wooded nations in Europe, with the EU average for woodland cover standing at 38%².
7. The ambition to change this has historically been limited. In 2013, a target to increase English woodland cover by two percentage points by 2060³ was adopted, requiring the planting of around 5,000 hectares of trees a year up to the target date. Recent statistics suggest that even this very modest ambition has not been realised, with only 1,420 hectares being planted in England in 2018/19⁴.
8. Despite the new target of 30,000 hectares a year by 2025 for the whole UK being in place⁵, the Government's 2020 allocation of core funding for tree planting in England (through the Countryside Stewardship scheme) suggests that the English target will remain at current levels (around 5,000 hectares a year)⁶. We are hopeful that the improvements to grant funding and private finance facilitation, sketched out in the England Tree Strategy, will be developed further to provide further funding sources. The Nature for Climate fund will have a role to play in this funding, although it is important that the fund also supports other habitats, and is only used to support schemes that support's nature recovery, as well as providing climate benefits.

² <https://publications.parliament.uk/pa/cm201617/cmselect/cmenvfru/619/61905.htm>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221023/pb13871-forestry-policy-statement.pdf

⁴ <https://www.woodlandtrust.org.uk/press-centre/2019/06/planting-figures/>

⁵ <https://www.theyworkforyou.com/wrans/?id=2020-10-22.107737.h&s=30%2C000+hectares#g107737.r0>

⁶ <https://questions-statements.parliament.uk/written-questions/detail/2020-02-27/21906>

9. Planting only 5,000 hectares in England every year for the next thirty years would result in England's woodland cover increasing by only 150,000 hectares by 2050. This falls well short of the scale of planting recommended by the Climate Change Committee⁷ and of the aim stated in the English Tree Strategy consultation for 'unprecedented afforestation in England'⁸.
10. Without a subsidiary tree planting target for England, to drive up woodland cover ambitions from the current 5,000 hectares a year, there is a real danger that efforts will be concentrated on tree planting in Scotland - as has been the case in recent decades⁹. Historically a focus on tree planting in Scotland has caused damage to non-woodland habitats there.
11. Link has proposed a subsidiary target of at least 10,000 of the 30,000 hectares of UK tree planting a year taking place in England¹⁰ to address this risk and ensure that England's woodland cover is subject to significant increase. 10,000 hectares a year for England, of which at least 6,000 hectares should be native trees, should be seen as a baseline - subject to discussion with the devolved nations and alignment with similarly ambitious plans for other habitats, we believe there is the potential to go much further. Friends of the Earth research¹¹ suggests that there is potential land available to double England's tree cover without impinging on mapped priority habitats, designated sites, or valuable farmland.
12. The English woodland cover target of at least 10,000 hectares a year should be subsidiary to legally binding biodiversity targets (set through the Environment Bill), covering a range of habitats. This will help ensure that woodland cover in England is not be increased in isolation –and instead forms part of a wider growth in the quality and quantity of all high-value habitats for nature. As suggested throughout this paper, ambitious Local Nature Recovery Strategies, driven by biodiversity targets and developed to build a holistic and comprehensive Nature Recovery Network, could coordinate a nation-wide, habitat-wide enhancement of space for nature and ensure that the growth of one habitat does not come at the expense of another. If biodiversity targets and Local Nature Recovery Strategies build a system that extends full protection and support to habitats that could be damaged by poorly planned tree planting, the England woodland cover target could expand further. For example, the subsidiary target to increase tree cover by at least 10,000ha per year from 2021-25 (including both planting and natural regeneration), could be accompanied by an aspiration to do more, and to put England on a realistic trajectory to ensuring achieving 17% tree cover by 2050. This represents the low end of the 17-19% range expected to be recommended for the UK by the Committee on Climate Change in its 6th Carbon Budget later this year. Indeed one scenario in the CCC Carbon Budget is expected to go further still further on afforestation – proposing 20% UK woodland cover by 2050. Such an increased woodland cover aspiration for England could make a significant contribution to nature's recovery– but if and only if the aspiration

⁷ <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

⁸ https://consult.defra.gov.uk/forestry/england-tree-strategy/supporting_documents/englandtreestrategyconsultationdocument%20%20correctedv1.pdf

⁹ <https://commonslibrary.parliament.uk/research-briefings/cdp-2016-0241/>

¹⁰ <https://www.wcl.org.uk/docs/Link%20England%20Tree%20Strategy%20response%2010.09.20.pdf>

¹¹ <https://policy.friendsoftheearth.uk/insight/finding-land-double-tree-cover>

follows from biodiversity commitments, covering a suite of habitats and underpinned by high quality data to allow the right habitats to be protected, restored and created in the right places.

13. It should be noted that not all priority open habitats and species have been adequately mapped. More comprehensive mapping of priority open habitats is essential, as are site-specific assessments to ensure that existing open habitats, or opportunities to restore and expand them, are not compromised by tree planting. In addition, some tree planting schemes have already begun on land over which the public has a right of open access. This could lead to the loss of those rights when the open access maps are updated, so it is vital to ensure access land is recognised and a mechanism is in place to protect the public's access rights when woodland cover is expanded
14. Further subsidiary targets would also help drive a significant increase in woodland cover in England and ensure that new woodland contributes to a thriving Nature Recovery Network. Additional subsidiary targets should include:
 - At least 6,000ha of the 10,000 hectares of new woodland created in England each year (the target we propose above) being comprised of native trees.
 - A net increase of trees outside of woods (TOWs) across England by 2025. We have lost around half of our TOWs since the 19th century due to land use change and industrial agriculture. Ash Dieback currently threatens many more TOWs. This target should be supported by specific sub-targets for agroforestry and hedgerows. For example, the Climate Change Committee recommended a 40% increase in their extent by 2050 to help achieve net zero.
 - A minimum of 10,000ha protected each year by 2025 to promote new woodland established by natural regeneration, contributing to the overall UK target of 30,000 hectares of trees each year by 2025 . This protection, linked to financial support, will send an important signal to land managers in England that natural regeneration is a legitimate means of woodland creation for which they would be rewarded. 10,000 ha should be seen as the bare minimum – it is suggested that there is potential for the protection of 25,000 ha per year up to 2030, a scale of protection that would be commensurate with the scale of biodiversity loss and the need for carbon sequestration. Natural regeneration should become the favoured method to deliver on the Government's woodland cover expansion targets in England. Wherever suitable, this method should replace potentially damaging or inappropriate tree planting.
 - A minimum of 1,000ha per year of previously forested land restored to open habitat. Very little progress towards this ambition stated in the Forestry Commission's Open Habitats Restoration Policy 2010, with the last two years showing net loss. A clear target with a workable policy based on this ambition should be created. There should not be a need for mandatory compensatory replanting as a consequence of increased open habitat management.
 - A minimum of 75% of woodlands in either good condition or improving for nature by 2030. We are presently far from this ambition.

Q2) Are the right structures in place to ensure that the UK wide target¹² for increasing forestry coverage is delivered?

15. The subsidiary targets outlined in the above section should be seen as the top tier of a structure to deliver increased woodland coverage. These targets should be nested within wider biodiversity targets set through the Environment Bill and its secondary legislation, with Ministers required to regularly report progress to Parliament.
16. The England Tree Strategy has the potential to function as the next tier in the structure, providing a strategic spatial approach to guide the achievement of targets. To be truly effective, this spatial approach needs to recognise the role woodland expansion can play in the delivery of a wider vision – the development of a Nature Recovery Network. As defined by the Wildlife Trusts¹³, the Nature Recovery Network is a joined-up system of places important for wild plants and animals, on land and at sea, allowing plants, animals, seeds, nutrients and water to move from place to place and providing plants and animals with places to live, feed and breed. New woodland should form an integrated part of an ambitious Nature Recovery Network, with the England Tree Strategy directing the creation of more, bigger, better, and more joined-up woodlands, hedgerows, trees and scrub, as part of a wider system of interconnected and diverse habitats, including non-woodland habitats, where nature can thrive. It should also provide opportunities for people to connect with nature.
17. The speedy publication of the Government’s promised Nature Strategy, intended to be the parent document for the Tree Strategy as well as the forthcoming Peat Strategy and other plans, would assist in connecting different habitats together. A holistic approach in the Nature Strategy could underpin the growth of the Nature Recovery Network and ensure that it covers, protects, and supports a diverse range of habitats.
18. Local Nature Recovery Strategies (LNRS) are proposed in the Environment Bill as the building blocks for a Nature Recovery Network – as such they should provide the spatial and strategic framework for decision making to establish woodland in locations where it will most benefit nature, people, and the climate, allowing for robust and decisive decision making. By doing this, they can function as the local floorplans to the national blueprint provided by the England Tree Strategy. Delivery and implementation, informed by the LNRS, will allow for local variation and prevent uniform habitats and landscapes across England to the detriment of biodiversity and regional character.
19. LNRSs should be prepared and published by a responsible authority, including active engagement of locally appropriate stakeholders, including community members and well informed organisations to draw on local knowledge, expertise, and opinions about where to integrate trees into, and across, the landscape and within the urban environment. Governance processes for creating LNRS should draw on the expertise of existing bodies¹⁴. LNRSs should

¹² Our response covers England only, and our responses to this question reflect this.

¹³ <https://www.wildlifetrusts.org/nature-recovery-network>

¹⁴ Including: Forestry and Woodland Advisory Committees, Catchment Partnerships, Local Access Forums,

also be subject to public consultation to ensure local communities can review plans for where new trees go.

20. Some further work is required to make LNRSs fit for woodland expansion purposes and for delivering a holistic and comprehensive Nature Recovery Network. As currently drafted in the Environment Bill, LNRSs are isolated documents. There is no requirement on authorities responsible for LNRSs to link the Strategies into the Tree Strategy and other environmental plans, and no duty upon authorities to apply LNRSs to relevant areas of local activity (such as planning). Further work also needs to be undertaken on to establish how best LNRSs can contribute towards the achievement of national targets, whilst still allowing locally driven decision making. Amendments to the Environment Bill¹⁵ can address these points and ensure that LNRSs reflect spatial approaches above them, and have a tangible, deliverable and measurable impact on the local areas they cover.
21. These improvements to LNRSs should be accompanied by wider work to ensure that the Government aligns all the pieces (including targets, strategies and mapping) needed to build a meaningful Nature Recovery Network. The Government needs to take responsibility for overseeing the function of all the disparate elements now in train, to align them together to fulfil the central 25 Year Environment Plan vision of a holistic, comprehensive, and well-planned Nature Recovery Network.
22. In order for the proposed woodland expansion structure of targets, strategy, and local plans to work effectively, all three elements need to be well resourced – both in terms of information and funding.
23. It is essential all woodland expansion is informed by high quality national and local environmental datasets, effective information systems, and ongoing monitoring and reporting to ensure that strategic woodland expansion and linkage is guided towards appropriate locations.
24. The National Habitat Map (as required by the Environment Bill) must be underpinned by high quality environmental data of sufficient granularity, and well-designed information systems to provide national and local decision making, reinforced with site-level surveying of habitats and species for significant individual projects. Without the right data, neither the England Tree Strategy or LNRSs will be able to set informed plans for woodland expansion and ensure the simple principle of ‘the right trees in the right places’.

Regional Flood and Coastal Committees, National Park Authorities, AONB Partnerships, Local Nature Partnerships, Local Enterprise Partnerships) and existing environmental priorities (e.g. River Basin Management Plans, Rights of Way Improvement Plans, National Park and AONB Management Plans, Visual Impact Assessments, National Character Area profiles, Landscape and Visual Impact Assessments.

¹⁵

https://www.wcl.org.uk/docs/Greener_UK_and_Link_briefing_for_second_reading_of_the_Environment_Bill_February_2020.pdf

25. High quality environmental and public access data will empower authorities to take informed decisions about woodland expansion at a local level. For example, the beneficial impacts of floodplain planting can vary hugely depending on the location and the type of trees planted alongside the interaction tree planting has with other floodplain habitats such as wet meadows – expert advice is needed to evaluate and compare tree and woodland’s contribution compared to other habitats and to ensure there will be overlapping benefits for flood defence, water quality, biodiversity and amenity/recreation. To provide this high-quality environmental data, the Government needs to urgently invest in new data systems, and to train up greater numbers of local government ecologists, or better use and fund locally-available data through Local Environmental Record Centres. Ecologists can advise developers on woodland expansion decisions, which includes consideration of the location of new woodland in relation to the functional impact on species and habitats where losses have occurred. Further training can also be provided those in regulatory roles, to embed awareness of the need for the right trees in the right places.
26. Training new ecologists is just one part of the resourcing required to successfully increase woodland cover. In particularly tree deprived parts of England (such as East Yorkshire¹⁶), public land acquisition will be required to further expand the area of biodiverse, native woodland habitats. Targeted incentives will be required to ensure that the Environmental Land Management (Agriculture Bill) and Biodiversity Net Gain (Environment Bill) schemes align to further woodland cover targets, and result in significant increases in woodland cover on agricultural and development land respectively. Additional resourcing will also be needed to enable LNRSs to track habitat losses and gains and incorporate these into their plan making.
27. Dedicated capital investment should be allocated for urban trees. This is a large-scale, capital-intensive investment, but it offers high value for money, especially in terms of human health and wellbeing benefits. For example, National Trust research shows a return of £200 billion in physical and mental health benefits for £5.5 billion invested in urban green infrastructure¹⁷.

Q5) In relation to increasing forestry coverage in England, what should the Government be trying to achieve?

28. The commitment to plant 30,000 hectares of new woodland by 2025 is a significant opportunity to promote biodiversity and nature recovery, and to create a meaningful Nature Recovery Network – which will deliver further climate, social, and economic benefits¹⁸. In order to achieve these benefits, it is essential that woodland expansion follows a holistic approach. Such an approach means recognising the value of non-woodland habitats, making use of natural regeneration, exploring the potential of agroforestry, recognising the dangers posed

¹⁶ <https://thenorthernforest.org.uk/in-action/>

¹⁷ <https://www.nationaltrust.org.uk/press-release/new-research-shows-55bn-fund-needed-to-level-up-access-to-urban-green-space-as-part-of-uks-green-recovery>

¹⁸ <https://naturalengland.blog.gov.uk/2020/08/19/a-pioneering-step-towards-delivering-englands-nature-recovery-network/>

by an overly commercial or carbon-focused approach to forestry, and recognising the natural capital value of publicly accessible woodlands.

Recognising the value of non-woodland habitats

29. We need more trees and woods, but they will not be appropriate everywhere. Tree planting must not undermine the conservation of other important habitats and landscapes or their associated wildlife. The expansion of trees and woods should be integrated with other land uses and wider biodiversity objectives at the landscape scale, to form a contributory part of a wider Nature Recovery Network and be directed in a way that does not compromise the ability to meet broader statutory biodiversity targets
30. Open habitats, such as species-rich grassland, peatland and heathland, can be particularly badly affected by inappropriate woodland expansion. Planting of even small pockets of woodland on open habitat could have adverse effects on some important species, including reptiles, amphibians and invertebrates. For this reason, site surveys, robust carbon accounting, and expert habitat protection and enhancement advice will be essential to determine whether woodland creation or expansion is appropriate in a given area. It is important that essential environmental protections, including Environmental Impact Assessment processes are not undermined in pursuit of woodland cover targets.
31. Similarly, rivers which have important aquatic and marginal plant communities, or are adversely affected by low flows/water levels, are not suitable for tree planting. Neither are areas where riparian trees could compromise the quality of other high-value-for-nature riparian habitats (such as floodplain meadows) and impact on water quality. Whilst trees and woodland have a valuable role in flood protection and water quality, relevant land use planning and management policies to improve resilience will have substantially greater success by enabling the creation and restoration of a wider range of the right habitats in the right places to deliver necessary nature-based solutions and natural flood management.
32. Strategic spatial planning through Local Nature Recovery Strategies can integrate woodland with other habitats. For example, integrating glades and rides can help provide important open habitats contiguous with wooded areas, as well as important routes for people to navigate through the landscape. Such environmental planning should maintain the flexibility required to balance the need for new woodland with the need to protect other habitats.
33. It is vitally important that decision makers recognise that tree planting is not a silver bullet solution to climate change and nature's decline. Whilst this message may have political resonance, it does not reflect the complicated ecological reality. The right trees in the right places, informed by high quality data and forming part of a coherent and varied network of habitats, can provide carbon storage and high value habitats for nature. An approach that eschews this nuanced reality in favour of headline generating tree planting figures will fail to unlock these benefits for climate, nature and communities¹⁹.

Making use of natural regeneration

34. Planting trees does not create a woodland. Forest ecosystems are diverse and dynamic environments which have developed over years, decades, and millennia. They contain complex ecological networks and relationships, both above ground and within the soils, between a huge array of diverse species. Natural regeneration is the best way of creating new woodlands for wildlife and expanding ancient semi-natural woodland by allowing these ecosystems to develop. Not only is it more cost effective than planting up sites, trees established by regeneration are more likely to be better adapted to local climatic and environmental conditions and will result in woodlands with a more natural species composition.
35. Natural regeneration of woodland should be one of the primary methods for increasing native tree cover, where suitable, supported by the planting of local native woodland species where necessary from nurseries of locally sourced stock. Natural regeneration should not be conflated with self-seeding of inappropriate species that have been planted previously, such as non-native conifers and rhododendron. It is also essential to incorporate flexibility in the approach to allow management of natural regeneration, including recognising the importance of protecting ponds from encroachment, and allowing for the protection and appropriate management of open habitats such as heathland.
36. Within urban areas, natural regeneration opportunities are more limited due to the fragmented nature of land and its multiple uses but should still be the preferred approach. The Government's recognition of the value of natural approaches to woodland creation and the value of community involvement in the England Tree Strategy consultation document is welcomed. However, the Government must set out more clearly how this method of woodland creation will be incentivised.
37. Areas of natural regeneration must be strategically located next to/connected to existing areas of high-quality native woodland or hedgerow habitat to increase habitat connectivity and permeability. This provides areas of regeneration with the necessary seed banks and species assemblages required to develop diverse and resilient woodland habitats.
38. Woodland-succession habitats, such as dense thorny scrub and woodland pasture, are key elements of the natural regeneration process and should receive support through woodland creation grants. Thorny scrub protects young saplings by providing a natural tree guard against damaging grazing activity by deer, and provides important habitat for a number of key open-woodland and woodland-edge species, increasing biodiversity within woodlands.

¹⁹ Early reports concerning Turkey's tree planting programme suggests the dangers of a numbers-focused approach: <https://www.theguardian.com/world/2020/jan/30/most-of-11m-trees-planted-in-turkish-project-may-be-dead>

39. Successful natural regeneration of woodland habitats is only possible through the restoration of ecosystem services, and is further bolstered by the reintroduction of key species. This allows the regeneration of woodland which is more biologically and structurally diverse, more suited to local conditions, does not rely on polluting plastic tree guards, and requires far less monetary investment.

Exploring the potential of Agroforestry

40. Agroforestry has the potential to make a significant contribution to woodland cover, combining economic benefits with the delivery of multiple environmental outputs, including the establishment of new trees and enhanced management for existing trees and woodland. Intervention is needed to grow agroforestry, including financial support and improved advice and guidance to land managers on assessing appropriate agroforestry options as part of ELMs.

Recognising the dangers posed by an overly commercial or carbon focussed approach to forestry

41. Trees and woodlands in the UK must not be managed solely for carbon storage at the expense of biodiversity and other natural capital. Incentives for woodland management which focus on maximising carbon capture or timber output (as was frequently the case before the 1990's²⁰) at the expense of biodiversity and other habitats (which also have carbon storage potential) would be a disaster for ambitions to address the ecological crisis, and meeting the goals of the 25 Year Plan and forthcoming targets in the Environment Bill and Convention on Biological Diversity. At the same time, woodlands have a vital role to play in mitigating climate change and providing sustainable resource and employment in our economy, so the pursuit of synergy between climate, biodiversity and social benefit is paramount.

6) Are the right policies and funding in place to appropriately protect and manage existing woodlands in England?

42. Less than 10 per cent of our native woods are in good condition for nature. Creating new woodland will count for little, if we allow the woodland we already have to degrade further.
43. To address this, and meet our suggested subsidiary target of a minimum of 75% of woodlands in either good condition or improving for nature by 2030, land managers should be incentivised to effectively manage, monitor and enhance the stock under their responsibility, drawing on expert guidance on what constitutes sustainable woodland management²¹. These incentives to increase appropriate management of woodlands should be holistic and recognise the wide range of ecosystem services provided by different

²⁰ <https://www.wildlifetrusts.org/habitats/woodland/coniferous-plantation>

²¹ Sample of such guidance include: <https://www.woodlandtrust.org.uk/publications/2010/02/sustainable-forest-management/>
<https://woodlandwildlifetoolkit.sylva.org.uk/>

woodlands and woodland habitats (including closed-canopy woods, wood pasture, open areas within woodland, trees within open landscapes, urban trees and successional woodland, including thorny scrub). Increased uptake within England of certification to the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC) schemes (accredited through the UK Woodland Assurance Standard - UKWAS), would help to improve management - uptake of UKWAS in England has fallen over the last decade to 25% of woodland area (the UK average is 44%). We understand that UKWAS are currently considering a review of standards. The enhancement of these standards to take further account of both biodiversity and climate commitments would be helpful.

44. There is potential for publicly owned forests and publicly owned land more generally to be used as an exemplar to demonstrate the value of an ecological approach to woodland management, including expanding the area of new native woodland on the public forest estate, delivering more habitat restoration (including open habitats), and expanding the estate itself through land acquisition. The public forest estate has led the way in dedicating its freehold estate for public access under the Countryside and Rights of Way Act, proving that woodlands can be effectively managed for timber, nature, and people.
45. Particular types of woodland need tailored support to thrive. A commitment to restoring Planted Ancient Woodlands Sites (PAWS) needs to be made, to better protect biodiversity-rich ancient woodland which requires sensitive management. The 2005 Keepers of our Time policy statement²² on ancient woodland should be reviewed, with a view to renewed targets, responsibilities, and timings being set. Veteran trees, of which Britain has one of the highest populations in Europe, should also receive special attention, to better preserve them and the unique biodiversity benefits they provide²³.
46. Our existing woodland also needs to be protected from pests and disease. There is a real danger than trees imported to meet tree planting targets could carry with them new pests and diseases, which could have a devastating effect on our already vulnerable existing woodlands. All trees planted with public money should be UK sourced and grown to protect from imported diseases²⁴.
47. Trees in urban environments, which are often vulnerable to premature felling, should be better protected so they can continue to play vital roles as Green Infrastructure in providing clean air, noise reduction, flood alleviation, and carbon storage as well as sustaining and enhancing urban biodiversity, providing shade and increasing the quality of accessible urban greenspaces.

This response is supported by the following Link members:

²²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778106/KeepersofTimeanw-policy.pdf

²³ <http://publications.naturalengland.org.uk/publication/75035?category=551045>

²⁴ <https://www.woodlandtrust.org.uk/plant-trees/uk-sourced-and-grown/>

The Woodland Trust
The Wildlife Trusts
Friends of the Earth
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November 2020