

**Written evidence submitted by The Game & Wildlife Conservation
Trust (TPW0047)**

The Game & Wildlife Conservation Trust (“GWCT”) (www.gwct.org.uk)

We are a leading UK charity conducting conservation science to enhance the British countryside for public benefit. We use our research to provide training and advice on how best to improve the biodiversity of the countryside. With respect to this inquiry, we have drawn on GWCT work on the planting and management of woodlands for game and other wildlife, black grouse and curlew research in the uplands, as well as the sustainable management of woodland at our Allerton project (<https://www.allertontrust.org.uk/>), where we operate two biomass heating systems fuelled entirely from our own lands.

As a general point we would like to politely suggest that the EFRA committee considers whether the design of the Tree Strategy consultation as a series of questions and answers limited those responding’s ability to provide constructive comment. We certainly felt that the contribution we could make to the development of the Tree Strategy, given our experience in this area, was limited and made this point to Defra at the beginning of our submission.

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

The GWCT accepts the need to target the planting of trees as part of climate change mitigation policies but is concerned about such an approach resulting in the focus on forestry rather than tree planting or woodland. This might seem pedantic but forestry by definition implies large-scale plantings, involving the re-purposing of land-use, whilst the other terms suggest small-scale sensitive plantings. Our concerns stem from recent experience in Scotland, where government targets to increase woodland cover have led to an expansion in commercial forestry, not native woodland, which is disproportionately targeting marginal farmland in upland areas. These last remnants of semi-natural grassland habitats are important for a range of priority species of high conservation concern such as black grouse, curlew, golden plover, lapwing and grey partridge which have suffered catastrophic declines over the past 100 years. Species such as black grouse are now only found in a fragment of their former occupied range and cannot withstand additional habitat loss due to further inappropriately sited commercial forests.

We are concerned that the ambition to plant 30,000 ha/year could result in large-scale ecological disturbance and the inability to meet other international

conservation commitments. It is critical that a thorough assessment is made to ascertain where this woodland would be established. Inappropriate large-scale planting in open lowland landscapes will impact upon the habitat of threatened wildlife species e.g. corn bunting and grey partridge which are native to open treeless landscapes. Similarly, the detrimental effects of large-scale commercial afforestation on moorland and moor fringe specialists is well documented (curlew and black grouse).

Policy should focus on increasing woodland in and around urban areas close to people and the incorporation of tree planting within the farmed landscape in small clusters, as hedgerow trees and as agroforestry. We have estimated that planting a tree every 20 metres in English hedgerows would significantly meet the Policy target, with the potential to host 40 million trees without re-purposing a single acre of land, even allowing for planting strategies that omit open arable landscapes such as found in the high-ground of the Lincolnshire Wolds or East Anglian Fens.

Similarly, in the uplands, woodland expansion should focus on restoring, connecting and expanding pockets of native woodland and ensure that new commercial afforestation is targeted appropriately away from marginal upland farms with high conservation value.

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

In our opinion the delivery structures are in place; our concern is that the right delivery is enacted and this requires appropriate policy guidance. Recently grant application rules were changed to reduce the minimum application size and block size and remove the requirement for minimum growth rates in 70% of the species proposed for planting.

However the rules still require a minimum of 5 hectares in total even if split into different blocks of a minimum of 0.5 hectares and that any designed open space over and above 20% of the total project areas will not receive funding. Such stipulations to receiving grant aid are likely to continue to restrict rather than encourage farmers to plant field corners and small copses on marginal land and may not encourage the “right tree in the right place”. These stipulations are also likely to reduce the broader benefits of planting woodland.

Similarly, grant aid support favours the establishment of commercial sitka spruce over that of native broad-leaved woodlands. Greater financial support needs to be given to creating open native woodlands which have better biodiversity and recreational benefits.

The restrictions on planting densities as well as allowing controlled livestock to access wooded areas also need to be removed. Establishing small pockets of scrub woodland also need to be included. These changes would allow agroforestry to receive grant support. This is important as agroforestry delivers a range of benefits such as bringing carbon into the farming system at times of the year that other farming methods cannot, making more efficient use of land by encouraging the utilisation of space above and below ground and across it and providing shelter, nutrition and welfare benefits for livestock.

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

No comment as outside our area of expertise.

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

In this regard we refer to comments on the grant scheme stipulations mentioned in answer to Q2 above. Whilst changes have been made we have highlighted other hurdles to receiving grant support that we believe discourage land managers to plant trees. The changes outlined above would ensure that Policy recognises that the primary purpose of a wood can be very different according to the motivation behind the reason for planting it. We envisage two motivations - commercial/carbon and heritage/aesthetics; both can include benefits to biodiversity.

Furthermore grant aid needs to cover on-going management such as grey squirrel or deer control. Given the increasing focus on Natural Capital, the impact of these species on woodland needs to include their impact on the delivery of key ecosystem services such as carbon sequestration budgets or biodiversity, as well as loss of timber. This may radically alter the cost-benefit assessment of including grant aid to control grey squirrels and deer.

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?*

The need to maximise the delivery of a range of ecosystem services from each hectare of land in our island nation creates uncomfortable policy trade-offs. Instead of a general policy direction requiring prioritisation of some objectives over others, we favour a bottom-up approach which encourages site by site assessment (and its impact on neighbouring ground) of what is possible and indeed desired. We are concerned that climate change adaptation and mitigation objectives are dominating policy direction and that this is leading to inappropriate policy outcomes that potentially undermine other policy objectives such as biodiversity. For example a 'top-down' map produced by Friends of the Earth identifying potential tree planting sites highlighted "low grade pastureland" as areas for opportunity including sites on the hill-fringe in the North Pennines and Yorkshire Dales which are of critical importance for waders and black grouse that are the subject of international biodiversity obligations. The focus on nature-based solutions (NbS) is welcomed as a way of balancing these objectives but we emphasise that the land manager/farmer given suitable guidance and advice is best placed to design appropriate tree planting strategies that balance some or all of the policy objectives listed above.

In relation to biosecurity and plant health we would like to emphasise that native genetic stock is important not only for tree health but also for biodiversity. We have found that trees being imported from Eastern Europe came into leaf two or more weeks later than native stock which is incompatible with the life-cycles of some dependent species such as moths, as leaf emergence was then out of synchronisation with egg laying. We are uncertain as to what action the government has taken to ensure that the providers of UK grown seedling trees are geared up to deal with the national targets.

Other priorities should include the public benefit delivered by planting for sporting purposes, although this could be included under recreation. Game management is a significant motivation to private investment in woodland planting, management and regeneration. Indeed this motivation has reversed a national trend of the loss of large areas of farm woodland to agriculture and urbanisation in the second half of the 20th Century and a reduction in the levels of management in remaining farm woodlands because they were often no longer economically viable. The woodland habitat desired for game shooting can be created or enhanced by traditional coppicing and sky-lighting to creating favourable conditions for the regrowth of the under-storey vegetation. These techniques benefit other wildlife, including songbirds and butterflies. Research

has shown that many of these woodland species are declining (Fuller et al., 2005), and a reduction in the amount of under-storey vegetation in woodlands has been cited as a possible cause of these declines. In addition, in recent years, species found in ancient woodlands have declined partly because open areas within these woodlands have been lost. A GWCT study suggested that rides in woods managed for gamebirds can provide these open areas.

With regard to food security, support for agro-forestry schemes allows food production and carbon sequestration to take place on the same parcel of land. We need to be mindful however that the agriculturally less productive land is likely to be the land which a farmer would favour to plant trees on. Care needs to be taken that habitats such as species rich pastures and rough grasslands are not covered with trees; or that upland peat bogs and grouse moors and adjoining marginal farms are not re-purposed for trees – a practice that has been shown to result in a net loss of carbon and of wildlife.

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?

We remain concerned that an opportunity to effectively manage existing woodlands that were planted as part of post-war schemes (as opposed to ASNW) for policy objectives will be lost unless appropriate policies and funding are in place. Such support for land managers/farmers could be provided as part of ELMS along with the management of ASNW.

Whilst we appreciate the need to “protect” ancient woodlands this should not be at the detriment of on-going management. We prefer to regard these as receiving conservation status rather than protection as the former implies the efficient use of the woodland rather than preserving it in aspic.

We would also argue that funding should include the availability of Biodiversity or Environmental credits, not just carbon credits. In many cases woodland management is not viable for the wood owner as the value of the timber is only likely to cover the extraction costs. The motivation to manage woodlands is then based on an alternative value such as for a shoot or an appreciation of the beauty of the landscape where there is zero economic case to be currently made.

Game & Wildlife Conservation Trust

1st December 2020