

# Written evidence submitted by The Woodland Trust (TPW0056)

## December 2020

### Background

1. The Woodland Trust is the UK's largest woodland conservation charity. We have 500,000 members and supporters and manage more than 1,200 woods, the large majority of them in England. We create havens for wildlife by planting millions of trees every year, campaign for new laws to protect ancient woodland and restore damaged ancient woods so they can breathe again.

### Introduction

2. The Woodland Trust warmly welcomes the opportunity to submit written evidence to this important and timely inquiry and would be very pleased to give oral evidence.
3. The inquiry takes place amid an increased awareness of the importance of woods and trees in delivering on some of the great policy challenges of our age. The latter recognition saw every major political party at the last election backing a significant increase in tree cover and the UK government seeking to champion nature based solutions in the run up to its hosting of the COP 26 conference.
4. The inquiry also takes place ahead of publication of the England Tree Strategy (ETS). Throughout this written evidence we refer to the importance of that Strategy setting us on the path to truly harnessing the enormous potential of woods and trees. In particular, the need for a properly resourced ETS which is about more than numbers and which sets out a bold vision to expand, connect, restore and protect them so that they are good for nature, climate and people.
5. For decades, there has been an established case for expanding native tree cover in the UK. This is needed to counteract historic tree losses which have left many ecosystems fragmented and species threatened by local extinctions. Added to this is increasing understanding of the indispensable role that native trees and forests can play in absorbing and storing carbon for the long term, making expansion central to the achievement of Net Zero by the middle of the century.
6. Equally pressing however is the need to look after the trees and woods we have and it is important that this too receives the political attention it warrants. England is a stronghold of ancient woodland and veteran trees. These irreplaceable cultural and biological wonders need the highest level of protection, and investment in their restoration where they have been damaged. Development pressure, imported tree diseases and the impacts of historic forestry practice are among the growing threats they face, so renewed and enhanced commitments to protection are essential if the ETS is to break the cycle of managed decline. The contribution of trees to quality of life and the economy is also clear. We take hugely valuable services from trees including managing and filtering water, retaining soil, shading the places in which we live and work, leisure resources enjoyed regularly by millions, and place-making landmarks across our towns and cities. We need policies and incentives to both safeguard what we have, respond to the climate and nature emergencies and ensure more people benefit from the services we gain from trees. Doing so will require adherence to the principle of public value for public money along with good regulation of private investment over the long term.
7. It is essential that the targets associated with the Environment Bill, (currently making its way through Parliament) reflect these priorities.
8. In answering the questions, we have sought to consider trees and woods in the round and not limit our answers to 'forestry' as such.

## Summary of Key Points

9. It is essential that targets address quality as well as quantity and that they are addressed as part of both the Environment Bill target setting process and the England Tree Strategy. These should include a minimum net increase of 30,000 ha in England by 2025 and at least 18,000 ha to be native (measured by canopy cover)
10. Beyond this, country targets must rise to meet the trajectories required to achieve the 19% UK woodland cover by 2050 recommended by the Climate Change Committee.
11. Targets must also address Trees Outside Woods (5% increase by 2025) and land set aside for natural regeneration (5000 ha per year).
12. There should be a target for a minimum of 75% of native woods to be in favourable or improving ecological condition by 2030.
13. The England Tree Strategy must confirm the Government's commitment to restoration of all Plantation on Ancient Woodland Sites (PAWS). Active restoration should be underway on all PAWS on the Public Forest Estate by 2025.
14. The Government must urgently address the impact of its proposed planning reforms on woods and trees and the ability of communities to be heard in defence of them. We are calling on MHCLG to establish a clear 'no-go' area for development that includes ancient woods and ancient and veteran trees. This must include a strong (50m) buffer to ensure that they are protected from both loss and indirect impacts. At present the plans threaten to undo the welcome changes to the National Planning Policy Framework made in 2018 and undermine the Prime Minister's global statements around protection of nature.
15. It is essential that the mechanisms are in place to promote co-operation across the four countries around setting and reviewing targets. These targets must be driven by biodiversity as well as net zero objectives. This UK-wide dialogue needs to address natural as well as political boundaries and funding structures too.
16. It is critical that tree health continues to be co-ordinated on a GB basis.
17. Biosecure procurement should be a central part of all woodland creation plans, with the UK & Ireland Sourced and Grown (UKISG) assurance scheme used for all trees procured using public money.
18. We need to see investment in the UK nursery sector to give the necessary confidence to supply non-imported stock in line with woodland expansion ambitions. This should be accompanied by the development of proposals for a network of local nurseries and seed collection to enhance local provenance in tree planting for local authorities and others.
19. The historic separation of agriculture and forestry has undoubtedly dis-incentivised many land managers from incorporating trees and woods on their land. Financial and cultural barriers to landowners planting trees must be tackled.
20. The England Tree Strategy should confirm a commitment to increasing the overall number and the percentage of people in England able to benefit from accessible woodland near to where they live and promote 30% canopy cover as part of new developments.

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

21. The Government commitment to achieving net zero carbon by 2050 will require major expansion of tree cover. The Climate Change Committee currently estimates 30,000 – 50,000 hectares of new trees are needed each year across the UK from 2025 to 2050 as part of efforts to reach Net Zero carbon emissions (to be re-assessed as part of the 6<sup>th</sup> Carbon Budget process, reporting in December). This would take woodland cover in the UK from 13% to 17-19%.
22. Statistics on current tree planting rates show the scale of the challenge facing the Government in meeting targets for woodland expansion in the UK. Provisional Forestry Commission figures published in June show 13,460 hectares of woodland was created in the UK 2019-20:

- 10,860ha - Scotland
- 2,330ha – England
- 200ha - Northern Ireland
- 80ha – Wales

23. The Woodland Trust believes that it is essential that the forthcoming England Tree Strategy (ETS) sets out a suite of national targets and sub-targets for expanding and connecting our trees and woodland that combine quality and quantity. This should include:

- **A minimum net increase of 30,000 hectares of woodland in England by 2025** (measured by canopy cover).
- **At least 18,000 hectares of new native woodland in England by 2025** (measured by canopy cover).
- A net increase of 5% in number of Trees Outside Woods (TOWs) across England by 2025. This should be supported by specific sub-targets for agroforestry, wood pasture and hedgerows (estimated 25,000 ha increased in canopy cover when mature).
- A minimum of 5,000 ha of land protected each year to promote new woodland established by natural regeneration.

### Expansion metrics

24. Targets set in the ETS process should contribute directly and overtly to the biodiversity targets currently being developed as part of the Environment Bill process. It is also essential the final ETS has appropriate status and that it sets out the principles and targets to deliver tree and woodland expansion which combine **quality** and quantity. It is crucial that the latter are statutory, that they are picked up as part of the Environment Bill target setting process and that the ETS and its successor documents reflect these.

- We believe that The ETS must set out standardised, meaningful measures for expanding and connecting trees and woods in England. **As a measure, the current enthusiasm for 'number of trees planted' falls short of this objective. It is not a measure of quality.** It offers no distinction between types of planting, does not reflect how many trees will reach maturity, and overlooks notable factors including planned levels of thinning, trees lost to disease, and expected tree size and longevity. As such, it should not be used in the ETS.
- While carbon absorption is an essential element of targets for the ETS, the metrics used must ensure tree and woodland expansion is steered to reflect the full range of social, economic and environmental benefits which can be achieved by expanding tree cover.
- The most appropriate overall national metric is 'percentage of England's land area covered by trees'. This should be measured as canopy cover, reflecting factors such as the differing speed of growth and eventual size of trees and the major contribution that individual trees and smaller patches of trees and woods can make to achieving a large and pressing national target.
- The canopy cover target should be supported by sub-targets which define the quality component, reflecting the need to deliver not just carbon sequestration and commercial timber, but to buffer and link habitats, and make our towns and cities better places to live and work. Recommendations for a suite of sub-targets are set out in the *Targets* section, below.

25. In general, a new spatial strategy is needed to guide woodland expansion, as part of a broader land use strategy for England. In the interim however, processes including Local Nature Recovery Strategies and the recently announced Nature Recovery Network should guide this process – not least to ensure that expansion contributes directly and overtly to the biodiversity targets currently being developed as part of the Environment Bill process.

## Across the UK

26. In terms of the wider UK picture, the Woodland Trust, in its *Emergency Tree Plan*<sup>1</sup> launched in Westminster earlier this year, set out the following expansion targets:

	Woodland Trust proposed target per annum (Ha) until 2025
Wales	5,000
England	10,000
Scotland	15,000
Northern Ireland	2,000
Total UK	32,000

27. **Beyond 2025, the Woodland Trust proposes that the individual targets for England, Northern Ireland, Scotland and Wales increase further, in line with the trajectories required to achieve the 19% UK woodland cover by 2050 recommended by the Climate Change Committee.** We expect similar advice to be forthcoming by the CCC itself in its advice on the 6<sup>th</sup> Carbon Budget in December 2020.
28. It is vital that **any new targets and policies for woodland cover also take into account additional losses of trees.** For example, the UK faces the loss of approximately 150 million mature trees and 2 billion saplings and seedlings to ash dieback disease in the next 10 to 20 years.
29. Short term targets are essential to ensure progress is made and measured over policy, grant and political cycles.
30. **It is important that woodland expansion targets are ambitious yet realistic.** They need to drive policy makers to invest in the structures, skills, regulation and advice required to deliver in terms of both the quantity and quality of new woodland. This means expanding tree cover in the right places and right ways to deliver a full range of benefits, such as wildlife, public access and carbon capture and storage.
31. In addition, UK nurseries will need time to build up their stocks of trees grown in the UK. UK sourced and grown trees can reduce the risks of importing tree pests and disease into the country.

## The importance of trees outside woods

32. Trees outside woods are an essential and all too often overlooked component of increasing tree cover to meet the needs of people and wildlife. Trees outside woods are those which do not fall within the definition of a woodland, such as individual trees, wood pasture or hedgerows. The Committee on Climate Change has also recommended a significant expansion of trees outside woods to achieve net carbon zero, including agroforestry (trees integrated into farming systems) and hedgerows). This is in addition to any new woodland cover.
33. The UK needs dedicated separate targets for the additional expansion of tree cover outside woodlands, such as agroforestry, hedgerows, wood pasture and urban street trees.
34. The majority of tree cover expansion should be delivered with native woods and trees, due to the importance of tackling the nature and climate crises together. However, the UK needs significantly higher levels of all types of tree cover, including sustainable production-focused plantations, which will often be a mix of native and non-native tree species. A core principle for all expansion is that it should not detrimentally affect important local wildlife, and should seek to maximise future wildlife value.

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<sup>1</sup> [www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/](http://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/)

35. Expansion strategies should also commit to supporting natural regeneration. Although not viable everywhere in the UK, making space for native woods and trees to expand and regenerate naturally rather than relying solely on new planting, will help trees respond to a warming climate and reduce habitat fragmentation.
36. In its Big Climate Fightback campaign, the Woodland Trust and its supporters are explicitly calling for the new Environmental Land Management Scheme in England (ELM) to support natural regeneration.

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

37. Whilst it is immensely positive that all four administrations are committed to a major increase in tree cover we see little evidence of co-ordination. We believe that as a priority, the UK Government should establish a process involving Westminster and devolved administrations to set, monitor and report on a contribution to a UK target for increased tree cover including the balance of native versus non-native.
38. There are echoes here of the Government's recent commitment to ensure that 30% of UK land is protected by 2030 – this too is going to require close co-operation but it is not obvious where this is taking place. We hope that the UK's hosting of COP 26 next year and imminent publication of its Nationally Determined Contribution to net zero (NDC) will lead to enhanced co-operation.
39. This moment, along with the Spending Review and publication of green recovery plans should confirm a UK-wide process for setting, reviewing, reporting on and revising woodland expansion targets. This should involve dialogue between UK and devolved administrations, with each country to make an agreed and proportionate contribution to a UK target in line with **both** net zero and biodiversity objectives.
40. These targets also need to reflect natural as well as political boundaries. It is crucial when advancing tree cover to not think solely in terms of countries but also in terms of functioning ecosystems upland and lowland, what will best enable them to flourish and the application of natural capital approaches. It would be helpful for example if countries shared approaches to priority setting in a 'public money for public goods context'.

### Funding structures

41. There are also a number of important points to note around existing funding structures. At present there is very limited funding for Trees Outside Woods (TOWs) and natural regeneration/colonisation.
42. Market mechanisms and blended finance are currently centred around carbon rather than seeking funding (in particular revenue funding) for the wider public benefits which the government has committed to.
43. Tools such as Yield Class also need to be updated in order to reflect all the benefits that come from well managed woodland.
44. It is also fair to say that natural capital models are not that widely used and that the 2050 Net Zero target could itself become a barrier to this if it focuses minds on a 30 year time horizon applicable to commercial woodland rather than the long term lock up of carbon which permanent new woodland might offer.
45. There is also a need for land management advice with specialist skills relating to establishing and managing trees and woods on agricultural land.

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

46. Whilst a number of elements of tree health are devolved, the four countries have historically worked well together because the issues and impacts tend to be cross-border. It remains to be

seen how this relationship will continue after Brexit. Scotland, for example, is already signalling that it may take a different approach in some circumstances. By way of illustration, Defra will be introducing civil sanctions for plant health breaches but Scotland will not be doing so –this being on the basis of capacity issues.

47. Given the pressure on woods and trees from introduced pests and diseases it is critical that tree health continues to be coordinated on a GB basis. Introduced species do not respect borders. Therefore, if a species is introduced, a country-wide response is needed. For example, oak processionary moth was intercepted at over 70 locations across GB in 2018/19 after infested consignments were landed in England and moved throughout the country. A rapid response was initiated and the trees destroyed in most cases. It is critical that this kind of GB-wide response remains available for any new pest or disease incursions.

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

48. The historic separation of agriculture and forestry undoubtedly dis-incentivised many land managers from incorporating trees and woods on their land. Financial and cultural considerations are both barriers to landowners considering planting trees. These are still very much in place – availability of land remains the biggest barrier to woodland expansion today. Other barriers include:
- A narrow focus on forestry as the main tool in achieving increased tree cover at the expense of approaches including wood pasture, hedges and agroforestry
  - Slow progress in harnessing market interest in trees and woods to deliver public goods and services
  - Concerns around deer management
49. The new Agriculture Act 2020 marks a significant and genuinely ground breaking shift away from such an approach to one of payment of public money for public goods but if the Government is serious about its tree planting ambitions it is essential that the Act's positive intent is followed through to delivery on the ground. With 70% of UK land under agriculture it is vital that the ambition of its Environmental Land Management Scheme (ELM) is not watered down. More of the same is simply not acceptable given the scale of the combined climate and nature crises which face us.
50. The England Tree Strategy objectives and our net zero commitments require an ELM system which overcomes these historic barriers, promoting a multi-functional approach to land use that supports sustainable land management and restores ecosystem functioning at a landscape level. It is critical to the success of ELM and the ETS that trees are seen as an integral part of the whole landscape.
51. All tiers of ELM must be open to all land managers. Making Tier 1 available only to farmers unnecessarily reinforces the separation between agriculture and forestry and will limit opportunities for ELM to deliver environmental public goods and tree planting targets. In addition:
- Land Managers should be able to access all Tiers simultaneously to allow support for full range of tree and woodland activities on any given holding.
  - Tier 1 should include woodland options, including support for hedgerows, woodland management and agroforestry.
  - Tier 2 should include support for the management and restoration of ancient woodland and ancient/veteran trees, as well as natural regeneration.
  - The focus of Tier 3 should be on large, collaborative projects aiming to restore the ecological resilience and functioning of the landscape.

## Nature for Climate Fund

52. We welcome the investment in trees and woods that the Nature for Climate Fund represents. In employing the fund to take forward the ETS' objectives, Government must learn from previous policy shortcomings:
- Avoid subsidising activities that bring limited public benefit and for which there is likely to be a commercial case.
  - Support both expansion **and protection** of trees and woods.
  - Support interventions in both woodland and forests, and trees outside woods.
  - Invest in measures which will facilitate an accelerated rate of woodland expansion in future years (for example, investment in the nursery sector).
53. The Spending Review should confirm that the £640m Nature for Climate Fund will be available in full this Parliament, with spending beginning before the end of 2020.

## Why progress has been slow

54. There are a number of reasons for limited progress in increasing tree cover including both financial and non-financial barriers (not least those which were highlighted by this committee in its 2016 *Forestry In England* report) and we welcome the fact that the England Tree Strategy consultation sought to identify how these might be addressed. Among those measures which the Woodland Trust would support are as follows:

### *Financial*

- Increasing the payment rates for incentives for woodland creation
  - Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply
  - Widening the eligibility criteria for the type of native woodland and tree cover creation that can be funded
  - Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental land management Scheme
  - A quicker approval process for grant agreements. But importantly whilst maintaining environmental protection of existing habitats.
  - Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)
  - Introducing mechanisms to realise a secure long-term cash flow for ecosystem services
  - Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation
55. Finally, it is also important to note that there is **currently no grant support for trees outside woods, natural colonisation or agroforestry and that there are Insufficient incentives to support ancient woodland restoration**

### *Non-financial*

- Providing land managers with better access to expert advice on woodland creation and ongoing management knowledge and skills
- Outreach to present the benefits of trees and woods to land managers
- Outreach to present the benefits of trees and woods to local communities
- Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land
- Developing a supply of diverse and locally-appropriate seed and planting material by supporting community tree nurseries and other small nurseries that provide UK sourced and grown trees.

- Providing best practice guidance on how best to achieve tree cover through natural establishment (e.g. most suitable locations, ground preparation, fencing requirements and decisions on management over time).

### *Regulatory*

- Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes
- Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes
- Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

### *EIA*

56. We would certainly support efforts to improve the process associated with Environmental Impact Assessment for afforestation.
57. The Woodland Trust was concerned however by the assertion in the ETS consultation document that EIA regulations cause uncertainty and are in themselves a barrier to woodland expansion. EIA regulations governing afforestation are an essential environmental safeguard and we strongly reject any case for their dilution. It should be possible to improve the efficiency of their operation without doing this.
58. Frustration with obtaining EIA consents relates primarily to costs associated with the process and the timeliness of decision making. This should be addressed by properly resourcing the regulatory process, not by undermining it. Improvements to the process should focus on:
  - Better resourcing of the system overall to speed up decision making
  - Investment to ensure the required data sets are easily accessible
  - Confirmation agencies will continue to offer site specific assessment and not rely on general advice
  - Consideration of shared responsibility for some information provision, reducing applicant's exposure to costs

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?
59. The UK does not have the time or resources to tackle the climate and nature crises independently and many of the policy objectives set out above are in fact interconnected. The ability to deliver on a wide range of agendas simultaneously has long been one of the strongest

arguments for investment in increasing tree cover. In particular, as referred to earlier, we believe it is essential that the ETS does not facilitate objectives for trees and woods being unpicked from the overall objectives for nature. Rather we believe that this connection should be reinforced by the Environment Bill.

60. The expansion of trees and woods needs to be integrated with other land-uses at the landscape scale (as set out in the 25 Year Environment Plan, and the forthcoming Nature Strategy). It should be advanced through existing or planned landscape scale processes including
- catchment management planning
  - landscape scale designations including National Parks
  - landscape scale projects led by land-owning conservation groups
  - support provided under Tiers 2 and 3 of ELM
  - strategic land-use planning initiatives
61. In all of the above, it is essential that there is recognition of the complexity and interconnectedness of habitats.
62. The Woodland Trust also wishes to see the ETS set out how spatial planning, industry standards and public funding will be aligned with the overall objectives of the ETS.

### Engaging people

63. The coronavirus pandemic has highlighted the importance of trees, woods and other high-quality green space to health and well-being. Yet, far too many people lack access to such resources. In 2016, the Woodland Trust's Space for People research found that across the UK, only 21% of people lived within 500m of accessible woodland and 27% did not have a larger accessible woodland within 4km of their home. Amongst the key ambitions we would like to see set out in the England Tree Strategy are as follows:
- A setting out of how trees and woods will make our towns and cities better places to live.
  - The ETS should also confirm a commitment to increasing the overall number and the percentage of people in England able to benefit from accessible woodland near to where they live.
  - Confirmation that national government will mandate all local planning authorities to produce statutory local tree plans along with guidance setting out what each plan will contain
  - We believe that the local plans should include the following:
  - a minimum 30% tree canopy cover target for new development land supported either by guidance on the use of developer levies (for example, stipulating a minimum of 10 trees for each new house constructed), or via spatial policy aligned with reform of the planning system.
  - Identification of creation, restoration and protection opportunities for woods and trees – Each local authority must identify such opportunities, in particular on public landholdings. Local authorities should use the results to inform their tree strategies with priorities identified via public engagement and approaches such as ecosystem services and natural capital planning.
64. We also need to see policy and investment building on innovative delivery models such as the Northern Forest (which will plant 50 million trees and create £2.5 billion in benefits) to establish major new areas of woodland around large settlements.

### Supporting the economy

65. In terms of supporting the economy we believe:

- The ETS must set out how investment in woods and trees will support the economy and deliver public money for public goods
- The ETS must set out how the Government will invest to grow the natural capital and ecosystem services of England's trees and woods.
- Agroforestry has the potential to make a significant contribution to ETS objectives, combining support for economic benefits with the delivery of multiple environmental outputs. The ETS must confirm a Government commitment to a major expansion of agroforestry

66. *The Economic Benefits of Woodland* report<sup>2</sup>, produced by Europe Economics for the Woodland Trust in 2017, identified that, from flood mitigation to health and well-being, the many benefits trees provide are worth over £270 billion.

### 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?

67. A step change is required in how we protect and enhance our woods. Policies, targets and investments are needed to achieve the following aims:

- Increase the area of woods being actively cared for and Ancient Woodland sites restored.
- Tighten planning guidance to protect Ancient Woodlands from direct and indirect harm.
- All new trees planted with public support should be certified *UK and Ireland Sourced and Grown* to avoid further spread of tree diseases.

68. The ETS must set out how investments in our trees and woodlands will protect our existing woodlands, improving the resilience and functioning of natural processes and ecosystems. This should be based on:

- A minimum of 75% of native woods to be in favourable or improving ecological condition by 2030, as assessed through the National Forest Inventory.
- Ensuring all Plantations on Ancient Woodland (PAWS) enter restoration when commercial non-native trees are harvested.
- All tree planting undertaken with public financial support to be of certified *UK and Ireland Sourced and Grown* trees to avoid further damaging spread of tree diseases.
- Transformation in how we protect trees and woods from diseases and pests through new processes and resourcing for quarantine, testing and rapidly responding to disease outbreaks.
- No further loss of ancient woodland
- Active restoration to be underway on all Plantation on Ancient Woodland Sites on the Public Forest Estate by 2025
- No restocking of PAWS with commercial plantation and immediate withdrawal of public grants which support such practice.
- An annual increase in the area of ancient woodland protected by statutory designation

### Protection of trees and woods from pests and diseases

69. We are keen that the Committee give particular consideration to this aspect of protection. The major expansion of woods and trees planned over the next 30 years needs stringent and well-resourced measures to protect trees and woods from the growing threat of pests and diseases:

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<sup>2</sup> [www.woodlandtrust.org.uk/publications/2017/01/economic-benefits-of-woodland/](http://www.woodlandtrust.org.uk/publications/2017/01/economic-benefits-of-woodland/)

- There have been at least 20 serious plant pests and/or diseases inadvertently imported into the UK in the last 30 years. During this same period tree imports have increased from £6 million in 1992 to £93 million in 2019.
- As a result, tens of millions of trees have been lost to diseases like Dutch elm disease and ash dieback.
- £93 million of trees were imported in 2019 but the cost of managing ash dieback alone is estimated to be £15 billion.
- There are 127 plant pests and diseases that are considered high risk to the UK. If imported into Britain, 47 of these could each cost over £1 billion to tackle.
- In 2018, imports accounted for 90.3 per cent of all trade value and 84.5 per cent of net mass of trade in plants and plant commodities.

70. Despite the above, current Government policy is for a hiatus in border checks on plants entering the country from 1 January – 1 July 2021, with checks instead happening at “Place of Destination” risking pests and disease being spread before they are detected.

### Investment priorities for tree health

71. Stringent and well-resourced measures are needed to protect the health England’s trees and woods:

- Making biosecure procurement a central part of all woodland creation plans.
- Using the UK & Ireland Sourced and Grown (UKISG) assurance scheme for all trees procured using public money.
- Investing in the UK nursery sector to give the necessary confidence to supply non-imported stock in line with woodland expansion ambitions.
- Develop proposals for a network of local nurseries and seed collection to enhance local provenance in tree planting for local authorities and others.
- Tighter and better resourced import controls with new processes and resourcing for quarantine, testing and rapidly responding to disease outbreaks.
- Ensuring biosecurity protocols are considered at the design stage of new policy approaches and protocols such as proposed Freeports.
- Include management of the impacts of tree disease (including liability costs) in Tier 1 of the ELM system, building on the planned Tree Health Pilot.
- Developing more seed orchards and identifying and registering more stands suitable for tree supply.

### Restoration

72. *Keepers of Time*, the Government’s 2005 ancient woodland restoration policy vision concluded this year. Progress toward many of the strategic objectives set out in *Keepers of Time* has been disappointingly slow and in some instances negligible or negative. Despite these failings, the document remains highly relevant in setting out the importance of ancient and native woodland, the threats it faces, and identifying policy priorities to protect and enhance it.

73. Given the government’s broader biodiversity ambitions we are keen to see a refreshed vision and policy support for the next 15 years (backed by appropriate resourcing) and welcome the news that a new restoration strategy may be forthcoming in the New Year. We want to see this accorded the priority it deserves given the context of a new Nature Strategy. Not least given that PAWs restoration embodies the 25 Year Environment Plan’s commitment to “support nature’s recovery and restore losses suffered over the past 50 years” by taking action to restore our most precious wooded habitats. **We are looking to the ETS to re-confirm the Government’s commitment to restoration of all PAWS sites.**

## Planning reform

74. An area of considerable concern for ancient woods and veteran trees (and indeed the wider natural environment) is the Government's proposed planning reforms in England which appear alarmingly out of step with the government commitments such as 30% of land protected by 2030 and other statements.
75. Our ancient woodlands cover less than 3% of our land, and once lost, they cannot be replaced. The planning system is the last line of defence for the majority of these as they have no statutory protection. And yet, ancient woodland and ancient and veteran trees (alongside other irreplaceable habitats) seem to have been forgotten in the current proposed reforms, thereby undermining the increased protection offered by the 2019 changes to the NPPF which represented a real step forward. There is no scope in the current consultation to further strengthen/improve protection of irreplaceable or any other habitats, such as by supporting buffer zones.
76. We are calling on MHCLG to establish a clear 'no-go' area for development that includes ancient woods and ancient and veteran trees. This must include a strong (50m) buffer to ensure that they are protected from both loss and indirect impacts. We hope that the Committee in its final report will support this call. And greater protection for other native woods and trees is needed to ensure that a zoning approach does not lead to perverse outcomes by providing a green light for damage of other important critically important habitats under Government's nature and climate commitments.

*December 2020*