

Written evidence submitted by the RSPB (TPW0064)

RSPB response to the Environment, Food and Rural Affairs Committee Tree Planting and Woodlands Inquiry, 4 December 2020

Summary

1. The RSPB supports sustainable woodland expansion. However, we want to see more focus on native woodland and other habitats that respond to public demand for a green recovery and deliver multiple benefits for climate, nature, and the wellbeing of society.
2. We recognise the need for ambitious targets for more tree cover and think a strategic approach to delivery is vital to ensure 'right tree in the right place' and deliver more tree cover within enhanced networks of natural habitats. This must include the investment needed for effective implementation of environmental safeguards required to ensure delivery of genuine benefits for people, climate and nature.
3. The RSPB have recently set out our recommendations for an England Tree Strategy and for Woodland Expansion in Scotland, including the need for a variety of approaches to deliver sustainable increases in tree cover alongside a range of other habitats as nature-based solutions to climate change. This response focusses on the situation in England, as we believe that it is for devolved administrations and legislatures to set their ambitions for woodland expansion in line with Climate Change Committee recommendations, domestic climate and biodiversity targets and other land use considerations.
4. Strategic approaches should be underpinned by robust environmental assessments and mapping to help target new woodland schemes, backed up by a robust approach to environmental impact assessment at the site level to ensure impacts are positive, including consideration of cumulative impacts on priority habitats and species. Improvements to the guidance and delivery of support for project proposals, in addition to improved environmental datasets could help to increase rates of woodland expansion.
5. Cross-border co-operation remains important for environmental protection and governance mechanisms, as well as other issues such as forestry standards and plant health and biosecurity.
6. Rates of woodland expansion in England have been hindered by poor grant administration, including problems with mapping, advice delivery, timing, agency coordination, and by severe delays to payments, plus a variety of other factors which have reduced confidence in increasing tree cover, such as land prices, tax implications, and the uncertain economic outlook. A review of woodland creation and management incentives will be required to identify how new, higher woodland creation targets can be achieved in a way that delivers biodiverse woodlands and other public goods and value for public money.
7. It is essential that tree planting is not unpicked from overall objectives for nature: woodland expansion in England must contribute to the delivery of a Nature Recovery Network of diverse and connected habitats. Delivering more environmentally sustainable commercial forestry must involve a more ecological approach and exemplar management of the public forest estate. A robust approach to carbon accounting is needed to ensure genuine climate benefits.

8. Sustainable woodland management must accompany woodland creation and deliver the right management needed to support the recovery of declining woodland wildlife. This must include the restoration and enhancement of Ancient and Semi-Natural Woodlands and woodland SSSIs as well as protected open habitats which represent vital support to declining wildlife populations. Long-term funding will be essential to ensure management can deliver biodiversity recovery. Increased pressure to extract woody biomass for bioenergy must not exacerbate existing issues for woodland biodiversity.

About the RSPB

9. The RSPB manages over 12,000 hectares of woodland throughout the UK to the UK Woodland Assurance Standard, with a focus on providing habitats for wildlife and delivering many other benefits. We also have projects underway to expand native tree cover at several sites, including our Haweswater Reserve in Cumbria and at Abernethy (Highland, Scotland) as part of the Cairngorms Connect partnership¹ with NatureScot, Forest and Land Scotland and Wildland Ltd., and work with a number of other organisations in partnership to manage habitats for wildlife throughout the UK. We are delivering 'forest to bog' peatland restoration² and research at our RSPB Forsinard reserve in the north of Scotland. We have taken on management of the nationally important veteran oak population at Sherwood Forest and the wildlife dependent on them, where we are also managing and restoring wood pasture.
10. Our Centre for Conservation Science carries out research to identify problems for wildlife and their causes, as well as testing solutions and their implementation, working with a range of funders and partners, including for several of the fastest declining woodland bird species such as willow tit, hawfinch, and lesser-spotted woodpecker, populations of which have all declined by 80% or more since 1970³.
11. We also work to deliver advice to farmers and other land managers and landowners on how to manage habitats for wildlife, and worked in partnership with Butterfly Conservation, Bat Conservation Trust, Plantlife, Woodland Trust, Forestry Commission, Natural England and the Sylva Foundation to develop the Woodland Wildlife Toolkit online resource⁴.

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

12. The RSPB supports sustainable woodland expansion and wants to see more native woodland, both planted and naturally regenerated that delivers multiple benefits; as a nature-based solution to the crisis facing our climate and nature, as well as underpinning human health, wellbeing and prosperity.
13. The RSPB recognise the need for ambitious targets for increased tree cover and think it is vital that targets for more trees are delivered strategically and underpinned by robust environmental assessments that will ensure delivery of the 'right tree in the right place'. Tree cover targets must not lead to unintended consequences by undermining the protection, restoration, enhancement and expansion of the full range of priority habitats that will deliver biodiversity recovery.

14. The RSPB note the Committee on Climate Change net zero recommendations for increasing UK woodland cover from 13% to at least 17% by 2050 by planting around 30,000 hectares of woodland each year, but think a greater level of tree cover will be needed⁵, along with greater ambition for peatland restoration, and the expansion, restoration and enhancement of other habitats which represent nature-based solutions to climate change.
15. Similar rates of planting achieved in the past were linked to damaging approaches to afforestation, including planting on deep peat, which tax system changes in the 1988 budget sought to address (to deliver better balance with environmental objectives⁶). Prior to these changes, peatland habitats were damaged by inappropriate tree planting, including in the north of Scotland 'Flow Country' where the RSPB have carried out over 2,600 hectares of 'forest to bog' restoration⁷ at our RSPB Forsinard Reserve and we are calling for strategic approaches to peatland restoration around the UK⁸. The poor condition of our peatlands means they currently emit the equivalent of 5% of the UK's greenhouse gases and unrestored could potentially emit twice as much carbon as tree planting targets recommended by the Committee on Climate Change are likely to capture⁹. It will be essential to continue to prevent tree planting on deep peat and restore afforested peatlands, whilst also preventing tree planting on organo-mineral soils such as shallow peat, unless nature and carbon benefits can be demonstrated.
16. Further paragraphs relate to the situation in England.
17. To achieve the right balance, tree planting targets must follow from plans for biodiversity recovery and in the case of target setting, must be subsidiary to biodiversity targets to ensure coherence. Tree targets must also reflect their contribution to biodiversity and climate, considering multiple factors including soil type (to protect carbon rich soils), other habitats and priority species. A variety of approaches to woodland creation will be needed, including allowing for use of natural regeneration as well as planting and for the variation in types of woodland that nature needs. The current focus on tree numbers is unhelpful and limits opportunities for habitat creation, for example where low-density tree cover is preferable for supporting species such as black grouse, or for use in some agroforestry approaches. Agroforestry and trees outside woodlands also have a vital role, including in urban areas where delivery of public benefits can be greater.
18. We think it is essential to avoid creating a regulatory imbalance with delivery of other habitats which will contribute to a Nature Recovery Network and with existing environmental protection regulations which govern woodland expansion proposals. Addressing the August 2020 Environment Bill targets policy paper¹⁰ question of whether a statutory long-term target for trees would be appropriate to deliver increased woodland cover, for example, there is a risk that having a standalone legal target for tree planting, alongside a policy-only target for peatland restoration could skew decision-making. DEFRA's policy paper proposes a target for habitats restored, created and brought into management for biodiversity. Delivering a balanced approach would require a target for woodland cover to sit within and be subsidiary to this habitat target.
19. Consideration is also needed for how statutory targets will work alongside the effective application of existing environmental safeguards and assessment frameworks to avoid undermining existing environmental protection obligations. Investment in the statutory agencies responsible for assessing woodland proposals will be vital to ensure that high standards and delivery of multiple benefits can be achieved.

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

20. As set out above, here we consider the situation in England. The RSPB have recently set out our recommendations for an England Tree Strategy¹¹. As set out in the answer to Q.1, above, a variety of approaches will be needed to deliver sustainable increases in tree cover alongside a range of other habitats as nature-based solutions to climate change.
21. As things stand, it is clear that the right structures are not in place to ensure that increased woodland cover is delivered in way that is safe and beneficial for climate and nature conservation objectives.
22. A strategic approach to identifying opportunities for new forestry will be vital and must be underpinned by a robust approach to environmental assessment at the site-level. The RSPB have ongoing concerns about changes to the Environmental Impact Assessment process, including changes which were put in place in 2018 to raise screening thresholds for EIA of forestry projects. Problems we have encountered have included failure by applicants to consider or plan for seasonal ecological surveys necessary to assess the existing value of sites and their surrounds to wildlife, lack of consideration of the need for buffers between open habitats and forestry and the impacts of new planting on open habitat connectivity, insufficient consideration of cumulative impacts of multiple projects, and reluctance by the Forestry Commission to require Environmental Statement preparation, even where the project scale goes well beyond the new thresholds, and in one case we are aware of, going against Natural England advice.
23. We strongly urge avoiding a de-regulatory approach to delivering commitments to tree planting. Past examples of high rates of UK afforestation were achieved without adequate environmental safeguards and consequently resulted in harm to both biodiversity and climate. This harm is still being rectified today several decades later, at significant public expense.
24. Strong environmental protections remain vital and the principles underpinning Environmental Impact Assessment processes provide a suitable mechanism for weighing up the positive and negative impacts of woodland expansion proposals. This must include consideration of the need to avoid cumulative impacts of losses from fragmented priority habitats or species populations which are negatively affected by an uplift in rates of woodland expansion.
25. Planting rates in England have remained low in recent years and opportunities remain to improve grant administration and payments which could increase confidence of landowners and managers considering converting land to woodland. Examples include more efficient grant and payment administration, landholding mapping, improved inter-agency coordination and access to advice, improvement of opportunity/risk mapping to include more comprehensive environmental data, and improved guidance and advice about the need to plan in seasonal wildlife surveys. Funding a programme of ecological and peat surveying could also help to support decision making for proposals affecting peatland areas, whilst individual projects must be supported by site-level surveying and assessments.

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

26. Cross-border co-operation on environmental protection remains essential, including the role for robust and coordinated environmental governance mechanisms. These will be necessary to ensure the join-up of ecological networks that will support the natural movement of species around the UK and beyond, as well as providing opportunities to share the research and best practice needed to deliver nature recovery.
27. The UK Forestry Standard remains an essential minimum standard, but a 'minimum standards' approach to its implementation will not guarantee delivery of genuine benefits, including for climate and nature and robust environmental assessments remain vital. Greater uptake of the UK Woodland Assurance Standard will be required, as an accredited standard which will help to ensure sustainable implementation, with levels of uptake having fallen in recent years, particularly in England (uptake of UKWAS in England has fallen over the last decade to 25% of woodland area, the UK average is 44%)¹². We think that these existing standards could be further improved to better deliver climate and biodiversity commitments
28. Good UK-wide co-ordination on plant health and biosecurity remains in everyone's interests. Recent outbreaks of oak processionary moth that resulted from imports of infested planting stock¹³ were illustrative of the risks of imported pests and diseases to both new and existing woodlands and trees in the wider environment. Risks from tree pests and diseases extend to both native and non-native trees¹⁴ (e.g. spruce bark beetle¹⁵) and many of the risks associated with imports of planting stock can be avoided through the use of diverse, locally-grown, native tree stock, and natural regeneration of native woodlands.

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

29. In England, Countryside Stewardship woodland creation schemes have been severely hindered by poor administration, including problems with mapping, advice delivery, timing, agency coordination, and by severe delays to payments. Whilst there have been attempts to address some of these, such as removing application windows, more fundamental changes are needed to deliver the step-change in tree and woodland cover which are necessary.
30. Plans for addressing financial barriers to woodland creation should also address other issues, such as economic uncertainties, the role of tax incentives and the issue of land prices, which are generally higher in England than other parts of the UK. For example, some have suggested that the restrictions on inheritance tax relief to commercial woodland or small farm woodlands have provided a disincentive to farmers who may otherwise have considered large scale native woodland creation, but have not done so for fear of jeopardising their access to Agricultural Property Relief.
31. The principle of public money for public goods must apply throughout all support mechanisms. In the case of support for woodland creation, this must allow for a wide variety

of approaches to woodland creation and for the ongoing management needed to deliver nature recovery.

32. A review of woodland creation and management incentives, including tax incentives, will be required to identify how new, higher woodland creation targets can be achieved in a way that delivers biodiverse woodlands and public goods and is value for public money. Investment in the capacity of statutory agencies overseeing woodland creation schemes will help to ensure efficient administration of proposals whilst also requiring a high standard of delivery.

5) In relation to increasing tree planting 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?**
33. It is essential that tree planting is not unpicked from overall objectives for nature. Investing in nature to help meet the challenge of net zero should mean a focus on delivering native trees and woodland and a range of habitats that represent nature-based solutions to climate change, including succession habitats via natural regeneration of woodland and open habitats such as peatlands.
34. Regardless of age, social class or income, people overwhelmingly support protecting and investing in nature and increasing accessible natural greenspace as part of our recovery from Coronavirus¹⁶. Nature-rich places can include native woodlands as well as other vital habitats for wildlife such as peatlands, grasslands, and heathlands, some of which can be damaged by tree planting.
35. The protection, restoration, expansion and reconnection of non-wooded habitats within a Nature Recovery Network must also continue. Currently, rates of restoration of open habitats from forestry including peatlands, heathlands and grasslands have effectively gone into reverse in England¹⁷ and a new approach is needed which allows habitat restoration to continue alongside delivery of increased tree cover, without placing restrictive compensatory planting asks on individual open habitat restoration projects. Improved monitoring of tree cover losses to development is also needed and habitat creation projects should not be unduly limited in response to these.
36. The Riskier Business report¹⁸ we recently published in collaboration with WWF has highlighted that the UK's overseas land footprint for timber supply currently affects an area bigger than Scotland and is placing unacceptable impacts on international biodiversity. Reliance on imported wood for bioenergy production and the failure of existing international accounting rules to sufficiently assess the carbon impacts are a key contributing factor.

37. To meet more of the UK's demand for timber products through sustainable domestic production, a more ecological approach to commercial forestry is needed which delivers biodiversity enhancement alongside other benefits, with the public forest estate managed as an exemplar. Greater uptake of the UKWAS standard will also help to demonstrate the value of international forestry standards.
38. This must be accompanied by actions to ensure food production is not shifted overseas to areas vulnerable to deforestation, by eliminating food waste and looking at a wide range of ways in which we can significantly reduce meat and dairy consumption.
39. A robust approach to carbon accounting should underpin woodland expansion and management, taking into account the fate of carbon in timber products.

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?

40. Sustainable woodland management is an essential factor for recovery of struggling woodland wildlife. Breeding populations of woodland birds have declined (31% in England, 29% in UK (1970-2018)), largely down to steep declines (41% in England, 47% in UK (1970-2018)) in populations of woodland 'specialists'^{19, 20} which rely on a variety of woodland habitats. A decline in woodland management is considered a key factor. Woodland management must be sustainable and respond to key ecological needs, for example key issues for woodland ecological condition such as a lack of deadwood habitats, veteran trees and stands of old trees, as highlighted in the recent National Forest Inventory reports²¹.
41. The England Tree Strategy must ensure the protection, restoration, expansion and reconnection of Ancient Semi-Natural Woodlands and woodland SSSIs as well as the ongoing protection and enhancement of protected open habitats.
42. Long-term funding for woodland management is essential to ensure that investment in woodland creation and management can deliver biodiversity recovery.
43. Increased pressure to extract woody biomass for bioenergy must not exacerbate existing issues, for example low availability of deadwood habitats and importance of standing deadwood and dead branches to hole-nesting species such as lesser-spotted woodpecker, as well as a variety of other wildlife including the fungi and invertebrate communities which support many other species.

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¹ <http:// Cairngormsconnect.org.uk/>

² <https://www.rspb.org.uk/our-work/conservation/projects/from-conifer-plantation-to-blanket-bog-peatland-restoration-in-the-flow->

[country/#:~:text=This%20'forest%2Dto%2Dbog,peatland%20stores%20of%20soil%20carbon](https://www.rspb.org.uk/our-work/conservation/projects/from-conifer-plantation-to-blanket-bog-peatland-restoration-in-the-flow-country/#:~:text=This%20'forest%2Dto%2Dbog,peatland%20stores%20of%20soil%20carbon)

³ 2017 woodland specialists index.

⁴ <https://woodlandwildlifetoolkit.sylva.org.uk/>

⁵ <https://community.rspb.org.uk/ourwork/b/rspb-england/posts/nature-as-solution>

⁶ <https://hansard.parliament.uk/Commons/1988-03-15/debates/2dd954d1-bc17-4101-b0978f886721ddde/BudgetStatement>

⁷ <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/no.12-the-science-of-peatland-restoration.pdf>

⁸ <https://storymaps.arcgis.com/stories/fe3455a345bf45ce9b72d70ae75f933b>

⁹ Based on RSPB analysis and projections to 2100.

¹⁰ <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets>

¹¹ RSPB consultation response to Defra: document not yet online and available by request.

¹² <https://data.gov.uk/dataset/d5ca9804-aaa0-44fd-89a2-ddbd54607ff1/certified-woodland-area-2001-to-2019>

¹³ <https://forestrycommission.blog.gov.uk/2019/10/11/a-coordinated-response-to-the-oak-processionary-moth-outbreak/>

¹⁴ <https://www.gov.uk/guidance/find-a-specific-tree-pest-or-disease>

¹⁵ <https://www.gov.uk/government/news/movement-authorisation-and-timber-plant-passporting-in-kent>

¹⁶ https://www.rspb.org.uk/globalassets/downloads/recovering-together-report/recovering-together-report_nature-and-green-recovery_rspbyougov_june-2020.pdf

¹⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901578/Forestry-Commission-Key-Performance-Indicators-2019-20-.pdf

¹⁸ <https://www.rspb.org.uk/globalassets/downloads/documents/risky-business/risky-business-report-summary.pdf>

¹⁹ <https://www.gov.uk/government/statistics/wild-bird-populations-in-england>

²⁰ <https://www.gov.uk/government/statistics/wild-bird-populations-in-the-uk>

²¹ <https://www.forestresearch.gov.uk/tools-and-resources/national-forest-inventory/what-our-woodlands-and-tree-cover-outside-woodlands-are-like-today-8211-nfi-inventory-reports-and-woodland-map-reports/nfi-woodland-ecological-condition/>