

## UK Parliament Environment, Food & Rural Affairs Committee (EFRA) inquiry: Tree Planting and Woodlands 2020

Consultation submission on behalf of the [Wood Pasture & Parkland Network](#)

### A. The What and Why?

#### What is WPPN?

The Wood Pasture & Parkland Network ([WPPN](#)) comprises a group of specialists and organisations keen to promote the benefits of this land management system for biodiversity, history, culture, landscape and people, that has existed for millennia.

WPPN exists to increase awareness of the international value of the historic landscapes and species-rich habitats that have been created and maintained by this land-use. Wood pastures and parkland are part of what makes the quintessential English landscape unique and emulated around the world. According to the wood pasture and parkland inventory on MAGIC, the total area, comprising 9813 sites, is 278,005 ha which represents only 2.09% of UK land cover.

#### What is WPP?

**Wood pasture and parkland (WPP) is listed under Section 41 of the Natural Environment & Rural Communities Act 2006 (NERC Act 2006) as a habitat of Principal Importance.** In fact, WPP is a land-use with a very diverse structure, largely maintained by grazing by large herbivores resulting in a dynamic mosaic of multiple habitats greater than the sum of its parts. The dynamic mosaic may include herb-rich pastures and/or heathland, patches of scrub, open-grown trees, including ancient trees retained 'in perpetuity', and groves of closed canopy trees. In contemporary landscapes this land-use integrates both agriculture and forestry as it can be recognised as an agricultural holding but is also a priority woodland habitat. As such it can be a very important land-use at a landscape scale.

#### Where are WPP?

The landscapes are especially evident in England as Royal Forests (of mediaeval origin), mediaeval deer parks, grazed common land or wood-fuel/ nut/seed/ fruit orchards with pollards. Examples include the New Forest (SSSI and SAC), Moccas Park NNR (SSSI), Sherwood Forest (SSSI and SAC), Windsor Forest and Great Park (SSSI and SAC), Richmond Park (SSSI and SAC), Blenheim Park (SSSI), Chatsworth (SSSI), Epping Forest (SSSI and SAC) and Burnham Beeches (SSSI and SAC). They also exist in the uplands e.g. Glenamara Park (Lake District), High Wood SSSI (North Yorks Moors), Whiddon Park SSSI (Dartmoor). Their value is often endorsed by their popularity for local and international tourism and events. The fact that many

of these sites and others have been notified as SSSIs is testament to their high biodiversity value. Those engulfed by urban development e.g. Hyde Park (London), Greenwich Park, Sutton Park (Birmingham), Allerton Park (Liverpool) are extremely valuable historic, recreational resources.

### **Why are WPP sites exceptionally important?**

Evidence of the international value for wildlife of wood pasture and parkland has long been demonstrated. As well as the evidence of the statutorily designated sites listed above, which include some of the most popular inland destinations in the UK, there are numerous publications providing evidence of this importance including:

- (i) Pasture-Woodlands in Lowland Britain. Harding and Rose (1986) ITE.
- (ii) Natural England Access to Evidence Information Note EIN011 Summary of evidence: Wood-pasture and parkland;
- (iii) Managing for species: Integrating the needs of England's priority species into habitat management ([NERR024](#));
- (iv) European Wood-pastures in Transition - A Social-ecological Approach. T Hartel and T. Plieninger ([2014](#));

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## **B. WPPN response to the EFRA Inquiry Call for Evidence**

The WPPN welcomes the opportunity to respond to the EFRA Inquiry and welcomes the inquiry's approach in seeking a robust assessment of the UK strategy for trees and woodlands.

However, the format and context of the questions in the *call for evidence* do not provide an obvious context for wood pasture and parkland as an exceptionally-important wooded landscape feature and, therefore, we are providing this written response to the issues raised in each of the questions.

### **Importance of Terminology**

The WPPN considers that the term 'woodland' is too generic and narrow a term, as understood by most people. The England Tree Strategy should represent a diversity of tree'd habitats including mosaics of habitats with trees, especially wood pasture and parkland. The latter land-use is amongst the most important of tree'd habitats for biodiversity in the UK. Furthermore, it is also important for the future of land management as a form of agroforestry and as a long-term store of carbon. Therefore, in our view, the broad range of habitats with trees should be recognised by the use of a broader term. We would suggest **either tree'd habitats** or **treescapes** could be adopted, depending on the scale of the change.

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

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- A. **Biodiversity and climate/carbon targets in step:** the WPPN supports the target for more trees as a vital response to the twin crises of climate chaos and biodiversity loss. However, to achieve the twin ambitions and avoid damage to important habitats, climate and biodiversity goals must march hand-in-hand. Targets for tree planting and carbon sequestration should be clearly tied to biodiversity targets. In order to receive public funding, any tree establishment (natural processes or planting) proposals must demonstrate clear biodiversity net benefits and must also demonstrate no harm to habitats of principal importance or declining species (see more on this under *Question 6*).
- B. **Broader and inclusive targets:** to address biodiversity, the tree targets need to be broader and more inclusive of all tree'd or wooded landscapes: – an England Tree Strategy should be just that, about **trees** in the landscape and not only concerned with forestry policy and woodland expansion.
- C. **Stratified targets:** national planting targets and funding mechanisms need to be stratified to ensure that there are incentives for a range of project scales and so that large monoculture plantations are not favoured, by financial incentives, over smaller and more structurally-diverse proposals. A scoring system needs to be created to ensure that advantage proposals that have multiple benefits are favoured and that numbers of trees or tree densities does not become the dominant metric. The **UK Forestry Standard** (2017) should be revised to accommodate this scoring system.
- D. **Importance of wood-pasture for carbon storage:** there is strong evidence that carbon sequestration and carbon residence time (or carbon years) – how long and safely carbon is stored – is not related in a simple way to tree numbers. Research by Cranfield University (**Upson et al 2016**) conducted over 17 years in Bedfordshire showed that a grazed wood-pasture site was 5% more effective in sequestering and locking up carbon than the same additive area of separate woodland and separate grassland parcels. This same study emphasised the importance of considering the likely storage time of carbon in soils and trees – and a new metric of carbon years. New planting or tree establishment proposals should be able to demonstrate their impact in terms of carbon residence time or carbon years.
- E. **Carbon residence time:** this issue of carbon years, or carbon residence time, was also reviewed as part of a multi-author international study (**Buntgen et al 2019**). Slow-growing species, like Oak, grown in the open and allowed to become large are likely to live longer and be less prone to disease and water stress. Such trees will store more carbon in the long term and are also more likely to retain it for much longer than faster-growing and short-lived species. Slower-

growing species should be favoured, therefore, or at least not disadvantaged in new woodland or tree establishment areas.

- F. **Open-grown trees:** trees of the greatest biodiversity importance are open-grown trees in mosaic landscapes which include flowering shrubs (**Green, T 2010; Sebek et al 2016**). These landscapes also happen to be the inland destinations most popular with the general public, as the list of Royal Forests and wood-pasture and parkland sites above demonstrates. There are numerous other parklands and tree'd commons which are often not designated but which are hugely valuable and hugely valued.
- G. **Aggregations not isolation:** although open grown trees need space, up to 0.02ha each for full-canopied oaks, to ensure the best outcome for vulnerable biodiversity (e.g. wildlife of relying on dead/decaying wood or saproxylic fauna – see Alexander 2016 NECR225c at [www.gov.uk/government/organisations/natural-england](http://www.gov.uk/government/organisations/natural-england)) open-grown trees should be near other similar trees or aggregations of trees whether in small groups, hedgerows or extended wood-pasture sites.
- H. **Promoting transitions and edges:** areas of mixed tree, grass and shrub habitats are also much richer in biodiversity than standard density (1100 stems per hectare) or monoculture plantations. Edges and transitions between different habitats are vital for biodiversity. Insect diversity is particularly influenced by such structural edges and most UK breeding bird species are woodland edge or scrub species rather than specialist woodland dwellers (**Fuller et al 2007**).
- I. **Bigger sites (extend and buffer):** it is especially important to buffer and extend existing good quality priority wooded habitats, especially wood-pasture and parkland sites, to ensure these sites are more sustainable and resilient for the future. In creating buffers around sites, it will be vital to protect existing edge habitats and ecological transitions and not to allow planting up close to woodland edges or existing open-grown trees.
- J. **Local Plan Green Infrastructure Strategy targets:** a target should be introduced for establishing more wood pasture and parkland and open-grown/solitary trees and shrubs in the right places, especially in urban areas. As well as vital habitat to ensure biodiversity resilience, much of this should be accessible to the public to increase the area of public open space. The COVID-19 lockdowns have demonstrated the need for more open space, with current lack of accessible areas contributing to over-use and damage of statutorily-protected sites by recreational pressure.
- K. **Quadrupling hectareage:** WPPN would propose a quadrupling of the hectareage of wood pasture and parkland in England i.e. 1 million ha representing 8% land cover. Such a target of quadrupling hectareage

could be achieved through a combination of developer-led financial contributions under the above green infrastructure studies – particularly provided alternative green spaces for new residential developments - and public funding for the public good depending on the locations.

- L. **Quadrupling individual tree numbers:** we would wish to see a similar quadrupling of solitary trees i.e. 88 million, such a scale of ambition being vital to address the past loss of hedgerows, street trees and the ongoing losses due to Ash dieback and other tree diseases. As above such trees should be established/planted in aggregations to ensure the optimum impact for biodiversity and human health benefits.
- M. **Natural processes/colonisation:** it is essential to recognise that tree'd habitats, including wood pasture can, in the right places and in the presence of grazing by large herbivores, be created through natural colonisation (also referred to often as natural regeneration). Where there is a suitable seed source, natural colonisation enables local provenance trees and shrubs to become established resulting in a more locally adapted/resilient and structurally diverse habitat, better adapted to local environmental conditions and supporting a wider range of wildlife. Additionally, it reduces the risk of importation of tree disease, reduces plastic use and is less costly. There should be clear targets for wooded areas (hectares) to be established through natural colonisation as opposed to planting (e.g. up to 50% of all new tree'd areas should be from natural colonisation or natural colonisation **combined** with tree planting).
- N. **Biodiversity net gain and natural regeneration:** tree establishment/planting proposals should be able to demonstrate net biodiversity gain. They should also justify why natural regeneration or a mixture of natural regeneration and planting would not be sufficient on the chosen site.
- O. **Natural colonisation zones:** such zones should be identified by all local authorities (in liaison with FC and NE) as part of their local plan green infrastructure strategies, where payments for natural colonisation (or regeneration) will be given priority over tree planting schemes. Such zones and their incentives should be prioritised for areas buffering or near to existing wood-pasture sites, suitable priority habitat inventory sites (where natural regeneration would support biodiversity), ASNW sites, statutory (SSSI/SAC) sites and county wildlife sites (CoWS).
- P. **Connectivity metrics not density targets:** connectivity should be the driving target for biodiversity alongside the carbon sequestration target of total numbers of trees and longevity (see **Buntgen et al 2019**). **Quality not just quantity of trees and tree'd habitats is vital for both biodiversity and carbon sequestration and long-term storage.** A range of agreed metrics for connectivity are required– e.g.

- number of ancient trees within 50m radius of new tree establishment by plantings/natural colonisation
- distance between new tree establishment/woodland and established woodland/ancient woodland

Q. **Mosaic metrics - Structural diversity and open canopies not density targets:** the standard planting densities of 1100 stems per ha (sph) and 1600 sph, to ensure eligibility for grant-aid should be dropped. Instead, there need to be other targets aimed at protecting or enhancing biodiversity and ensuring longer carbon residence times (see paragraphs 1D and 1E above). Future audits of funded sites should include measures of open canopy, distance between growing trees and percentage of scrub - the maintenance of which should be conditions of the grant-aid.

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

- A. In short, **no**, the WPPN members collectively do not consider that the right structures are in place. There are some worrying gaps in information and regulatory oversight.
- B. **National and local Priority Habitat inventories:** there is currently a significant deficiency in the WPP environmental dataset, one of a number of key data sets on priority habitats which is relied upon to inform decision making in land use change, including forestry. In order to achieve right tree and/or habitat in the right place and space it will be necessary to have robust maps of the distribution and quality of the wood pasture and parkland resource. Significant funding is required to update and maintain the current dataset. Similarly, investment is required in establishing, updating and maintaining inventories of ancient and other veteran trees, hedgerows and orchards.
- C. **Precautionary principle for unknown/unmapped habitat areas:** in the absence of good inventories of valuable habitats and soils, the precautionary principle should be used to ensure that care is taken to avoid damaging practices such as the planting of conifers on peat, infilling of wood pastures and parkland or on semi-natural herb-rich pasture. Care should be taken in being complacent in thinking that this practice is confined to history as there several recent cases of damage to natural habitats, including one which seems to have received grant aid.
- D. **“unknown” habitats:** habitats must not be classified as low risk for tree planting, as currently under the FC GIS system. Instead they should be categorised as “unknown”. All unknown habitats should then

be safeguarded until a proper survey has been carried out before a tree planting project is approved (see also point F below).

- E. **Peatlands:** tree planting on peatlands of any kind must be banned – recent cases have shown that destructive tree-planting is still being permitted. This is in part due to incomplete GIS mapping which provides false reassurance and demarcates areas as low risk for tree planting if not recognised for any valuable features (due to lack of survey) or as statutory sites. The safeguards are simply not in place.
- F. **Training for regulatory staff:** there is currently a deficiency in the breadth of understanding and promotion of WPP within the statutory conservation and forestry bodies. There is also a worrying lack of assessment of unmapped areas of habitat and an ability to recognise important habitats in general, illustrated by a recent planting case on a peatland. Where site visits did not prevent the project being given the go-ahead. We would be happy to work with the appropriate organisations to develop training and materials to address these gaps.
- G. **Advisory services resourced at levels appropriate to scale of targets:** well-resourced advisory services are required, ones which can properly engage with land-managers and the community to encourage the management, restoration and creation of wood pasture and parkland, ancient and other veteran trees and other open-grown trees in the wider landscape or urban communities.

Adviser designed land management schemes can deliver more for wildlife. The East Midlands Woodland Biodiversity Project was an enhanced intervention rate (80%) Woodland Improvement Grant Scheme. An advisor worked with woodland managers to design grant-funded schemes for target species. Defra-funded bird monitoring of sites after targeted management intervention showed a positive response

<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=20138>

- H. **UKFS and Carbon code:** The UKFS and the UK Carbon code need to be reviewed and refined to ensure latest scientific evidence, in what is a rapidly-developing field of research, is reflected in assessments of the carbon sequestration value/potential of scheme and especially carbon residence time as discussed above
- I. **Nature Recovery Networks investment:** without proportional investment in staff resourcing and training the desired increase in activity to support the development of Nature Recovery Networks will not be achieved. In turn this will prevent existing targets and any improved targets for the wider range of wood habitats being met.

- J. **Public good:** a starting point should be that public money should be used for public goods and not as an income supplement for businesses. Public goods can be achieved through a wide diversity of habitat restoration and tree establishment (both by natural generation and tree planting), including WPP and not just through forestry.
- K. **Sliding scale for funding:** large-scale afforestation is possible on large landowner estates. There should be a sliding scale of support that demands greater public good as funding increases. See also our above comments on *Stratified targets*.
- L. **Funding for wood-pasture creation and management:** the WPPN would like to see woodland creation grants that fund creation of priority wood pasture and parkland habitat which includes sustainable provision for pasture and solitary trees. Incentives will need to be sufficient to ensure this habitat is prioritised in the right locations and with natural regeneration/colonisation where possible. As a priority the habitat should be created following the Lawton principles of landscape-scale conservation<sup>1</sup> to buffer and extend existing wood pastures especially those that are rich in ancient and other veteran trees. A WPP metric, to measure this gain and to encourage developer contributions through biodiversity net gain targets, should be developed.
- M. **Support for long-term carbon stores in WPP:** emerging evidence shows that as many trees in WPP landscapes are maintained over long timescales, they have potential to recover and store carbon for much longer than plantation trees which are felled on short rotations. To promote the retention of large, old and mature trees in the landscape it should be possible to assess and promote their value for ecosystem services especially carbon sequestration and assign carbon credits to WPP creation schemes.  
Unimproved grassland and scrub are the components of Wood Pasture and this stores more soil carbon than improved grasslands and woodlands (Bradley et al 2005).
- N. **Strengthen the UKFS (also see answer to Q.6 below):** In particular the UKFS needs strengthening to avoid tree planting that damages wood pasture and parkland by 'infill' of open areas especially where there is a drive not only from plantation planting incentives but also carbon credits.
- O. **Funding and advice for extensive grazing systems:** Wood pasture and parkland can provide a win-win situation for land-managers where

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<sup>1</sup> Lawton, J. H. et al. 2010. *Making Space for Nature: A review of England's Wildlife Sites and Ecological Network*. Report to Defra.  
<https://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

a permanent change of land-use from agriculture to forestry is a barrier to establishing more trees and shrubs. It can be managed by extensive grazing and the trees contribute to livestock management and soil improvement. Management by extensive grazing allows for cash-flow of income throughout the lifetime of the habitat but especially during the establishment period. Therefore, we also consider that financial and advisory support should be increased and be concomitant with the scale of the required change of land use.

- P. **Upland wood-pasture options:** as a matter of urgency, the current hiatus on the use of the wood pasture options in the uplands (inside the SDA and above the Moorland line) should be resolved to enable this essential option to be used in CS agreements starting in 2022 and 2023
- Q. **Private funding:** the structures are not yet in place to deliver the private funding which will be required to address current market failures in the provision of public goods, for example carbon markets and markets for public benefits such as natural flood management, nature and public health. We would like to see this addressed as a matter of urgency.
- R. **Collaboration and community vision:** greater collaboration must be encouraged at local level between organisations, experts and individual land-managers around a strong community vision for individual and scattered trees and other new wooded habitats (including WPP). It should be a requirement of local partnerships, Local Nature Recovery Strategies and Nature Recovery Networks to identify where dynamic, mosaic habitats such as wood pasture and parkland are located and where management, restoration and creation would best be delivered but especially in relation to historic landscapes (e.g. historic parks and gardens, treed commons and the uplands).
- S. **SSSI series recognition:** WPPN would like to see areas of significant solitary trees and valuable WPP in particular better represented in the SSSI series so that they are prioritised for care, restoration or extending. There is significant evidence for the importance of such trees and WPP for biodiversity (for example see **Sebek et al 2016**) and it is essential that the SSSI series adapts to the growing biodiversity crisis by protecting these areas.
- T. **Farmland incentives:** wood pasture and parkland, unlike woodland, is primarily managed by grazing. It therefore overlaps between farming and woodland/forestry interests. As such it is often overlooked and the system needs specialists so that land-managers obtain the best advice on management, which requires knowledge of both trees and open habitat management. There needs to more uptake on farmland and payments need to recognise the longer return on investment of wooded habitats and that many arable farmers lack the infrastructure and

expertise to shift to pastoral farming.

- U. **Improving productivity of farmland/protecting soils:** Wood pasture and parkland does not remove productive land from agriculture, rather it improves the quality of land and makes crops more productive. There are also animal welfare benefits (e.g. shade, self-medication). This makes wood pasture and parkland a win-win system in terms of sustainable food production married in with provision of ecosystem services – if the infrastructure issues mentioned above can be tackled. It should therefore be a recognised option under the Tree Strategy, especially at the large scale.
  
- V. **Tree removal and protection of open habitats and ancient trees:** it should be recognised that in some cases the achievement of 25YEP ambitions for the restoration of priority open habitats, including wood pasture, may require tree removal (for example, of plantation woodland). Currently (outside SSSIs) tree removal of this type requires compensatory planting which acts as a deterrent to achieving habitat restoration ambitions. The requirement for compensatory planting in restoring priority habitats /such instances should be removed.
  
- W. **Buffer zones incentivised:** Buffer Zones around existing open-grown trees and woodland edge habitats must be embedded in the policies with priority funding for carefully-designed projects that protect edge and transition habitats.
  
- X. **Delivery of Water Framework Directive:** increases in tree cover can deliver natural solutions for improving water quality and quantity (see answer to Q5 below). Increased tree cover with associated permanent ground vegetation in catchments, especially in higher areas, reduces the volume and speed of run-off, reducing washing away of soils and subsequent silt pollution of surface waterbodies, and is a natural solution for flood alleviation. All England's rivers are failing to achieve WFD standards and there needs to be a step change in the delivery of catchment-based solutions using long-term, sustainable options (such as land use change in riparian corridors and upland catchments).  
<https://www.gov.uk/government/news/reduce-flood-risk-with-the-woodlands-for-water-scheme>  
<https://www.waterbriefing.org/home/regulation-and-legislation/item/17601-latest-environment-agency-data-reveals-all-english-rivers-fail-pollution-tests>

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

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No response

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

The view of the WPPN the overall factors at play in the failure to achieve previous ambitions for increasing tree cover in England were well covered in our responses to questions 1 and 2 above but include:

- A. **Narrow approach:** The narrow range of approaches taken by the Government for increasing tree and wooded habitats cover. This is exemplified by the over-emphasis on ‘forestry’ in both the England Tree Strategy consultation, and this set of EFRA questions. Tree’d habitats are not just about forestry and to tackle the twin crises of climate and biodiversity a much broader approach is required and one that is based on evidence (e.g. Bremer & Farley 2010; Sebek et al 2016).
- B. **Need for wider range of methods:** there has been, to date, a lack of focus on methods of increasing tree cover which bridge the gap between forestry and farming – such as wood pasture and agro-forestry. Grant aid to support the wider range of methods and tree densities is also lacking.
- C. **Lack of targets for non-forestry expansion of tree cover:** for example WPP, scrub, in-field and hedgerow trees, agro-forestry and restoring nature processes through rewilding projects, for example.
- D. **Exclusion of natural processes:** lack of focus on methods of natural as well as assisted (includes planting) regeneration of trees and shrubs, combined with a lack of recognition, focus and funding of elements critical to the establishment of trees by these methods, including introduction of large herbivore grazing, techniques for ground preparation with animals (e.g. pigs) and the necessity of landscape scale deer management.
- E. **Markets:** the limitations of markets in regard to the delivery of public goods and services and inadequate agricultural subsidy framework which did not effectively address market failure and resulted in perverse outcomes. For example, providing payments in the restoration of moorland habitats which enabled business owners to increase stocking of allotments which held extant or remnant WPP.
- F. **Lack of prospective sites:** there is not currently an effective “pipeline” of prospective applicants or sites for the creation or restoration of WPP sites and this needs to be addressed in a coordinated way by the various government agencies.

- G. **Deer management:** the lack of funding and public and private capacity for deer management across England has been a block on the establishment of trees and woodland (Fuller et al 2007), particularly establishment of WPP through natural processes. It can also negatively impact the condition of existing wooded and tree'd habitats through the simplification of structure and species composition through heavy and preferential browsing of regenerating trees and shrubs. However, in wood-pasture sites it will also be about balance as low intensity deer-grazing combined with other herbivore impacts can be beneficial. Local management needs to be based on local evidence.

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**Question 5: In relation to increasing forestry coverage in England, what should the Government be trying to achieve? For example, how should the following policy objectives be prioritised?**

- **Mitigating or adapting to climate change;**
- **Promoting biodiversity and nature recovery;**
- **Increasing biosecurity and plant health;**
- **Improving human well-being and health;**
- **Protecting natural and cultural heritage;**
- **Food security;**
- **Creating commercial opportunities from forestry, tourism and recreation; and**
- **Any other priorities? –**

**Other priority suggestion from the WPPN:** the protection of large open-grown and ancient trees from development. This includes increase the diameter of root protection and buffer zones. In addition, if required based on evidence of inventories and mapping, areas around such trees need to be populated by other successor native trees to prevent these becoming isolated (e.g. by urban barriers or intensive forestry or agriculture)

- A. **Natural processes:** Wood pasture and parkland creation is best where it can develop from natural regeneration utilising local seed sources and it therefore minimises the need for carbon intensive planting, and the associated use of plastic. It is an especially cheap and attractive approach in the uplands or steep hillsides of National Parks and AONBs.
- B. **Carbon stores protected:** In the uplands, peat deposits suffering from previous drainage damage must be protected by stopping up drainage and re-wetting at the same time as natural regeneration (or planting) schemes are advanced. There must be close integration of all land management to ensure that important habitats for carbon and biodiversity are managed in tandem and that incentives and public

money must not be provided to landowners without evidence of the protection of carbon stores on their entire landholding(s)/estate(s)..

- C. **In perpetuity:** creating native wood pasture and parkland where trees are retained in perpetuity would provide a very long-term store for carbon through sequestration in the soils and the longevity of the trees. Although net zero is the target, there will be a need to continue to offset carbon dioxide production beyond 2050 and wood pastures and long-lived trees can continue to capture carbon well beyond this date. [Large, old trees](#) and their soils have previously been underestimated for their value for carbon sequestration (Bradley et al 2005).
- D. **Landscape diversity:** WPP is one form of agroforestry and other forms especially sylvo-pastoralism are also welcome. The aim should be for diversity of landscape and structure not just a one-size woodland fits all and one that benefits farming, biodiversity and the landscape
- E. **Genetic diversity:** it is important that genetic diversity is represented in all planting schemes in order to build the greatest resilience into the tree population for the future. But this does not mean trees should be brought in from other climate envelopes, genetic diversity is well represented in our native tree stock already.
- F. **Parklands for people:** The importance of parks for people in urban communities, demonstrated by their use during the covid-19 lockdown, is fully recognised. More open, but tree rich, areas such as parks are more inclusive and put people at their ease. We strongly support the creation and best practice management of parks, especially in new residential areas. These should be included in the targets for urban areas. [https://www.rspb.org.uk/globalassets/downloads/recovering-together-report/recovering-together-report\\_nature-and-green-recovery\\_rspbyougov\\_june-2020.pdf](https://www.rspb.org.uk/globalassets/downloads/recovering-together-report/recovering-together-report_nature-and-green-recovery_rspbyougov_june-2020.pdf)  
<https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results>
- G. **Protect aquifers:** a model of natural aquifer recharge of the Sherwood Sandstone Aquifer in the Sherwood National Character Area showed significant increases to recharge in wood pasture habitat compared to arable farmland and conifer plantations, under current climate and projected climate change scenario (Carbó AN *et al.* 2019).  
<http://publications.naturalengland.org.uk/publication/1401066#:~:text=The%20Sherwood%20NCA%20extends%20north,remains%20a%20well%20wooded%20area.>

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**Question 6: Are the right policies and funding in place to appropriately protect and manage existing woodlands in England? How will prospective changes to policy and legislation effect this?**

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- A. **Need policies and/or legal protection** – to give effective protection from felling, damage, inappropriate tree planting and enforcement e.g. damaging infill of existing good wood-pasture and scrub habitats.
- B. **Priority Habitat inventory:** as described in answer to *Question 2* above the lack of complete priority habitat inventories is a major problem.
- C. **Prevention of infill of wood-pasture & parkland (WPP):** it is vital that tree planting is not allowed to “infill” between ancient and old growth trees and the mosaic habitats of existing wood-pasture and parkland sites. Infill is often an easy option for a landowner as it does not require change to the arable or other land in the estate. Infill of WPP must be resisted – and protection of priority habitats made stronger and incentives for tree establishment not allowed on such sites.
- D. **No overplanting of woodland edges:** It is also essential that edges of existing woodlands need to be protected from overplanting – so that important edge habitats are not destroyed and open-canopy conditions, glades and rides are promoted for biodiversity by suitable grant-aid.
- E. **Planning for the future white paper proposals:** the proposal of the division of the country in different development zones has the potential to undermine the current absolute NPPF protection for ancient woodland and ancient trees and, particularly, may endanger these habitats and species by allowing development too close to them. Recreational pressure from new developments close to ancient woods can lead to losses in biodiversity and erosion of soils (and subsequent carbon loss and tree declines).
- F. **Protection of soil and existing tree carbon guaranteed:** tree planting proposals should be able to conclusively demonstrate that soil carbon stores would not be depleted by their implementation. Project proposers would need to provide information about their soils before receiving public money to ensure no further peat layers lost. Any carbon credit or work through the carbon code must not just take into account newly sequestered carbon but the protection of existing carbon stores including soils and large open-grown trees.
- G. **SSSI series review:** Wood pasture and parkland is currently under-represented in the SSSI series, particularly in the upland context. As a result, there is significant disparity between the level of protection for designated wood pasture sites compared with others which may be of equally high biodiversity or cultural value but only have a basic level of protection. The SSSI series requires review in this regard.
- H. **WPP restoration incentives increased:** there should also be increased funding to protect the UK’s existing carbon stores in natural habitats. The pendulum of policy must not be allowed to swing towards

funding for new plantings at the expense of ecosystem restoration projects. Restoration projects seeking to protect biodiversity and other ecosystem services should attract increased levels of funding. For example, in wood-pastures and parklands ancient trees need to be protected from over-shading root-competition by younger trees. Incentives for *halo-clearance* around such trees needs to be continued and payments enhanced to ensure longer than the current 10-year support, in recognition of the need to maintain these stores of carbon and biodiversity in the long-term. (see also our answer under *Question 2* in relation to *Tree removal*)

- I. **Incentives for extensive grazing:** grazing incentives to ensure the dynamics of these mosaic and open-grown tree habitats also need to be provided using money saved by switching away from support of any intensive grazing, non-grass-based, high-input swards or predominantly indoor-based systems.
- J. **Incentives for important tree areas:** Incentives/ payments should be available for all landowners with relevant habitats e.g. city parks and extending grants or fund to assist owners of recognised important trees (e.g ancient, veteran, heritage, champion such as ancient yews in churchyards).
- K. **Solitary trees and Trees outside woodlands – natural capital:** ancient and other veteran trees are also found outside woodland habitats and are important biodiversity stepping-stones and often cultural icons in rural and urban locations e.g. the Parliament Oak (Edwinstowe, Sherwood) or the Crowhurst Yew (Surrey). They are long-term natural capital and provide centuries of ecosystem services. WPPN would like to see ancient and other veteran trees outside wood pastures better protected, managed by best practice and land-managers encouraged to establish more open-grown trees across the landscape to become the ancient trees of the future. (e.g. hedgerow regulations 1997 need updating as they don't mention hedgerow trees)
- L. **Felling licences reform:** Wider felling licence conditions or another regulatory mechanism for solitary trees and priority wood pasture and parkland and ancient and other veteran trees that will avoid **pre-emptive** loss or **damage** in both rural and urban situations. In particular a change to the 5cum allowance per quarter without a licence, where it might apply to valuable/ nationally important trees in any location. In addition, the protection should be extended to encompass management (prevention of damage) to the tree and the buffer zones (including root protection areas) for nationally valuable trees. The purpose of the governing legislation needs a review to broaden protections and the remit of the FC in this regard.
- M. **Urban treescapes:** mapping of habitats in urban areas (e.g. through use of software like *iTree*) so that they can be counted as contributing

to carbon sequestration targets and targets for planting in urban areas are counted in the England Tree Strategy. Local authorities should be given the resources to complete such work as a mandatory part of local plans.

- N. **Strengthen the UKFS:** Expand UKFS so that standards are included for ecosystem restoration in general and specifically for the management, sustainability and resilience of wood pasture and parkland and ancient/veteran trees. Any carbon credit or work through the carbon code must not just take into account newly sequestered carbon but the protection of existing carbon stores including soils and large open-grown trees
- O. **UKFS and dead/decaying wood:** The Woodland Natural Capital Accounts, UK 2020 identify that many woodlands are unfavourable condition for dead wood (77%) and veteran trees (99%). As the UK Forestry Standard states that there should be a minimum of 20 m<sup>3</sup> of deadwood per ha and 2 veteran trees per ha WPPN. This disparity should be addressed in the management of existing woodlands and UKFS should be updated with stronger targets.
- P. **TPO reform:** Changes to the TPO system provided that the protection measures currently afforded to trees is enhanced and strengthened. The ETS recognises the importance of dead wood but the TPO system allows the removal of deadwood from trees even where it is not a risk.
- Q. **Incentives for managing important trees outside woodland and agricultural support:** Extending grant support to owners of important trees such as ancient or veteran trees and other recognised important trees. This would help owners to manage their trees to best practice but also would be an indication of the value that society places on the trees, especially for ecosystem services.
- R. **Local authority tree strategies:** it should be a duty within Local Authority tree strategies to use their powers to identify and protect important trees in advance on land allocated for development. Local Authorities will need to be adequately resourced, with strengthened technical expertise, for this additional purpose. Such tree strategies should become a mandatory part of all Local Plan Green Infrastructure Strategies
- S. **Penalties as deterrents to tree loss:** greater penalties to deter loss or damage to ancient woodland (including wood pasture and parkland) and ancient and veteran trees given their priority for a sustainable future. Also, appropriate metric for replacement that properly recognises the long-term nature of any true replacement of value for society.

- T. **Deer and squirrel management:** As has previously been mentioned, deer (especially non-native deer) are a significant threat to the establishment and future management of some wooded habitats, especially the scrub layer of ancient woodlands. This tends to be in places where the numbers of deer are held high by access to intensive-farming crops. Squirrels at high densities can also damage new growth and regrowth of pollarded trees. However, control must be led by evidence at a local level and low-intensity deer grazing of wood-pasture habitats with other herbivores can be an important driver of diversity, where numbers are not held artificially high. New policies are required which build on the evidence, encourage the development of capacity for deer monitoring and management activities, as well as improving the UK wild venison market and supply chain.

## **References**

*(in addition to those with direct hyperlinks in text above)*

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