CONSULTATION
Response Document

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England Tree Strategy

(Department of Environment, Food and Rural Affairs)

11 September 2020

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

We welcome the opportunity to participate in the consultation on developing a Tree Strategy for England. We would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Comments from CIEEM

General Comments

We welcome the ambition in this document to create diverse woodlands and to scale action in England to meet climate targets and provide biodiversity gains. We particularly welcome the emphasis on the use of natural colonization and a wider ecosystem approach.

The Tree Strategy must deliver for both nature and climate. It must aid in reversing the long-term decline of biodiversity, but also adequately cover the need for flood alleviation; clean air; climate change mitigation and adaptation; and ensure communities and local people benefit. It is also important that landowners, through assistance from the government, enable as much access to woodlands for the general public as possible, to provide health and well-being benefits and encourage engagement with the natural environment.

In addition to woodland expansion, the Tree Strategy should support the restoration of existing woodlands. Improving the condition of existing woodlands will increase their ability to provide ecosystem services, as well as enhance biodiversity.

The government should ensure that the Tree Strategy creates a coherent and resilient ecological network at both a local and landscape scale, utilising the principles set out in the "Making Space for Nature" report and 25-Year Environment Plan. We welcome the mention in this document of using the " right tree in the right place", but this should be made an underlying principle of the whole strategy.

We welcome the commitment to integrate the Tree and Peatland Strategies, but further detail is needed on how land-use decision making will be balanced, as mentioned on page 7 of the consultation document.

The use of multiple-choice questions and strongly limited word counts in this consultation does not allow adequate space for detailed, evidence-backed answers. It is also difficult in places to see how the questions connect to the consultation document. We would like the government to provide a further opportunity for comment on the draft strategy when published.

Consultation Questions

Expanding and connecting our woodlands: questions

Which actions would address the financial barriers that prevent the creation of new woodland? (select all that apply)

a) Consolidating the current range of woodland creation grants into one

b) Increasing the payment rates for incentives for woodland creation

c) Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply

d) Widening the eligibility criteria for the type of woodlands and tree planting that can be funded

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) A quicker approval process for grant agreements

g) Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)

h) Introducing mechanisms that provide an annual cash flow in the woodlands' early years

i) Introducing mechanisms to realise a secure long-term cash flow for ecosystem services

j) Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation

k) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to derive an ongoing annual income from the land

l) Other - please specify in no more than 25 words

Which actions would be most effective in addressing the financial barriers that prevent the creation of new woodland? (select up to three options)

a) Consolidating the current range of woodland creation grants into one

b) Increasing the payment rates for incentives for woodland creation

c) Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply

d) Widening the eligibility criteria for the type of woodlands and tree planting that can be funded

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental land management Scheme

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g) Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)

h) Introducing mechanisms that provide an annual cash flow in the woodlands' early years

i) Introducing mechanisms to realise a secure long-term cash flow for ecosystem services

j) Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation

k) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to derive an ongoing annual income from the land

l) Other (if added, your own entry to question 6)

Woodlands provide a range of ecosystem services that provide benefits to businesses and society. How could government better encourage private investment in establishing trees and woodland creation? (Maximum 150 word response)

It is important that businesses understand what services from nature they rely on and, equally, what impact they have on those services. A simple but comprehensive set of indicators for how businesses impact biodiversity would allow them to track, reduce and mitigate the impact through investment in habitat restoration and creation, including trees and woodland.

Direct advice and encouragement from the government is the form of resources and brochures would be beneficial.

Which actions would address the non-financial barriers to the creation of new woodland? (select all that apply)

a) Consolidating the current range of woodland creation grants into one

b) Providing access to better information on the income streams well managed woodland can provide

c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills

d) Providing the investment community with access to expert advice on woodland creation and forestry knowledge and skills

e) Outreach to present the benefits of trees and forestry to land managers

f) Outreach to present the benefits of trees and forestry to the investment community

g) Outreach to present the benefits of trees and forestry to local communities

h) Changing policy so it does not treat afforestation as a permanent land use change

i) Increasing availability and access to contractors to plant and maintain the trees

j) Increasing availability of desired bio secure planting material

k) Educate and enthuse a new generation to expand the forestry industry

l) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land

m) 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.

n) 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).

o) Other - please specify in no more than 25 words

Which actions would be most effective in addressing the nonfinancial barriers to the creation of new woodland? (select up to three options)

a) Consolidating the current range of woodland creation grants into one

b) Providing access to better information on the income streams well managed woodland can provide

c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills

d) Providing the investment community with access to expert advice on woodland creation and forestry knowledge and skills

e) Outreach to present the benefits of trees and forestry to land managers

f) Outreach to present the benefits of trees and forestry to the investment community

g) Outreach to present the benefits of trees and forestry to local communities

h) Changing policy so it does not treat afforestation as a permanent land use change

i) Increasing availability and access to contractors to plant and maintain the trees

j) Increasing availability of desired bio secure planting material

k) Educate and enthuse a new generation to expand the forestry industry

l) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land

m) 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.

n) 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)

o) Other (if added, your own entry to question 9)

Which actions would address the regulatory barriers that prevent the creation of new woodland? (select all that apply)

a) Providing access to better guidance on how to meet the UK Forestry Standard

b) Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes

c) Empowering the Forestry Commission to make decisions that reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in our 25 Year Environment Plan

d) Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Reduce the time and costs associated with Environmental Impact Assessment for afforestation.

g) Other -please specify in no more than 25 words

Which actions would be most effective in addressing the regulatory barriers that prevent the creation of new woodland? (select up to three options)

a) Providing access to better guidance on how to meet the UK Forestry Standard

b) Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes

c) Empowering the Forestry Commission to make decisions that reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in our 25 Year Environment Plan

d) Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Reduce the time and costs associated with Environmental Impact Assessment for afforestation.

g) Other (if added, your own entry to question 11)

How can we most effectively support the natural establishment of trees and woodland in the landscape? (Maximum 100 words)

The natural regeneration of woodlands should be supported in strategically identified areas, to avoid loss of important open habitats and the biodiversity associated with them, such as species rich grassland or wetland sites. Both tree planting and natural establishment should follow the principle of using the 'right tree in the right place'. Thorough checks on the history of an area proposed for natural establishment is vital and the approach used should be appropriate for each individual site, which should be selected following an Ecological Impact Assessment by an experienced professional.

Natural establishment should be supported in target setting and in funding for woodland expansion as it is currently largely not recognised. In some areas it may be appropriate to support reduced intensity of grazing to allow for regeneration. Resources will also be needed to ensure the existing land use is suitable for natural regeneration, for example reducing sward density in grasslands to allow tree establishment.

Are there any other actions - beyond the options you have already selected or submitted - that would help land owners and managers to transform the level of woodland creation and increase the number of non-woodland trees in England? (Maximum 150 words)

Which of the following actions would be most effective in helping expand woodland creation in locations which deliver water, flood risk benefits and nature recovery? (select up to three options)

a) Widening the eligibility criteria for woodland creation grants so more applicants can apply and more forms of woodland are eligible

b) Widening the eligibility criteria for woodland creation grants so more sizes of woodland are eligible

c) Increasing grant payments for tree planting along water courses, steep sided slopes and difficult sites

d) Quicker approval process for grant agreements

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Implementing a joint approach to land management across government, including authorities responsible for protected landscapes

g) Providing better access to advice and guidance on woodland creation, forestry expertise and training

h) Other - please specify in no more than 25 words

What role could the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover? (Maximum 150 word response)

By restoring the condition of, and expanding, woodlands in National Parks and AONBs, these areas could form the backbone of ecological networks throughout England. Condition of existing woodland habitats within protected landscapes must be improved, reducing pressure from developments, agricultural practices and intensive commercial forestry. Local initiatives and landscape-scale conservation projects have worked well in designated areas to improve biodiversity and should be encouraged and scaled-up.

National Park Authorities and AONB Boards must ensure that when increasing woodland cover, it is designed to complement the local landscape, for example following the contours of river valleys or buffering, and connecting existing woodlands. Woodland expansion should also be strategically planned in these areas to protect valuable open habitats and other statutory and non-statutory designated areas.

Protecting and improving our woodlands: questions

Which actions would be most effective to increase protection for trees and woodland from unsustainable management? (select up to three options)

a) Introducing measures to support compliance with the UK Forestry Standard

b) More effective information sharing between government departments and their delivery bodies to inform decisions impacting on woodland, including to prevent woodland loss

c) Introducing clearer processes for licencing tree felling, with felling licences that can be suspended, withdrawn or superseded

d) Greater penalties for non-compliance with the requirements of the Forestry Act

e) Powers to set wider felling licence conditions, for example to enable enforcement of compliance with the UK Forestry Standard

f) A clearer policy presumption that all trees felled without a licence will be replaced (except in exceptional circumstances)

g) Refining the process of making Tree Preservation Orders, and clarifying the criteria to improve consistency in application of the policy across local authorities

h) Other - please specify in no more than 25 words

Resources for enforcement of compliance with the Forestry Act and UK Forestry Standard.

Which actions would best help the planning system support better protection and enhancement of the ancient and wider woodland environment and trees? (select up to two options)

a) Providing support to fully complete revision of the Ancient Woodland Inventory (to include ancient woodlands under two hectares in area)

b) Commissioning research into effective size and use of buffer zones around woodland for different impacts

c) Providing better monitoring and recording of decisions on planning applications affecting ancient woodland

d) Sharing best practice guidance and training to support implementation of National Planning Policy Framework policy on ancient woodland with local authority planners

e) Encouraging more woodland to be brought into management where impacted by development

f) More effective information sharing between agencies and local planning authorities to inform decision making impacting on woodland including to prevent woodland loss

g) Refining the process of making Tree Preservation Orders, and clarifying the criteria to improve consistency in application of the policy across local authorities.

h) Other - please specify in no more than 25 words

22. Which actions would address the non-financial barriers to woodland management? (select all that apply)

a) Providing user friendly woodland management services aimed at 'non forester' woodland owners

b) Ensuring public recognition of woodlands that are managed sustainably (for example, like Green Flag awards)

c) Providing better communication of the benefits and need for woodland management with land managers and investors

d) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

e) Training to increase the forestry skills capacity in agricultural workers

f) Other - please specify in no more than 25 words

23. Which actions would be most effective at overcoming the nonfinancial barriers to woodland management? (select a maximum of three options)

a) Providing user friendly woodland management services aimed at 'non forester' woodland owners

b) Ensuring public recognition of woodlands that are managed sustainably (for example like Green Flag awards)

c) Providing better communication of the benefits and need for woodland management with land managers and investors

d) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

e) Training to increase the forestry skills capacity in agricultural workers

f) Other (if added, your own entry to question 21)

Which actions would overcome the regulatory barriers to woodland management? (select all that apply)

a) Streamlining delivery of current regulations (for example, self-service felling licences for tree felling proposals that would not reduce woodland cover)

b) Placing responsibility for complying with woodland regulation on the woodland manager rather than the woodland owner

c) Placing a legal obligation on all land owners to manage their woodland

d) Other - please specify in no more than 25 words

Which actions would be most effective at overcoming the regulatory barriers to woodland management? (select one option)

a) Streamlining delivery of current regulations (for example, self-service felling licences for tree felling proposals that would not reduce woodland cover)

b) Placing responsibility for complying with woodland regulation on the woodland manager rather than the woodland owner

c) Placing a legal obligation on all land owners to manage their woodland

d) Other (if added, your own entry to question 23)

If you own and/or manage woodland(s) that is a Site of Special Scientific Interest (SSSI) what actions would help you most to bring that woodland(s) into management? (Maximum 100 word response)

N/A

Which of the following actions would be most effective in improving plant biosecurity across England's trees and woodlands? (pick up to two options)

a) Increasing the number of nurseries that meet the 'Plant healthy' management standard

b) Providing better best practice guidance and information about biosecurity

c) Introducing conditions which require suppliers to meet the "Plant Healthy' management standard for those public sector contracts and government grants that relate to tree planting and restocking

d) Amending planning policy to encourage local planning authorities to source trees from suppliers who meet the 'Plant healthy' management standard

e) Sharing the Forestry England's experience and case studies

f) Managing the impact of invasive non-native plants which provide a pathway for disease through targeted action, ongoing management and monitoring, and wider education

g) 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

h) Other - please specify in no more than 25 words

Which of the following actions are or would be most appropriate for England's trees and woodlands to contribute to climate change mitigation and helping to achieve net zero? (pick up to three options)

a) Bringing woods into management to enhance their future resilience to climate change and secure greenhouse gas emissions reduction in other sectors through wood replacing 'carbon intensive' materials (acknowledging that this will lead to a short to medium reduction on carbon stored in the woodland)

b) Planting UKFS-compliant productive forests to provide a strong carbon sink over the coming decades and then a source of sustainable timber to meet the needs of future generations

c) Planting predominantly native woodland to act as a long term store of carbon

d) Establishing 'energy forest' plantations (short rotation coppice and short rotation forestry) to satisfy future biomass demand for bioenergy with carbon capture and storage

e) Encouraging agroforestry to increase the amount of carbon stored on productive farmland

f) Strengthening the protection of all woodland to reduce greenhouse gas emissions from deforestation

Which of these actions would be most effective in reducing damage to trees and woodlands caused by deer? (select up to two options)

a) Develop a national policy on sustainable deer management and control measures

b) Facilitate landscape scale control by land managers

c) Deer control as a requirement of grant or felling agreements

d) Incentives for the management of deer

e) Supporting a range of approaches to tree protection, including fencing and other

alternatives to plastic tree guards

f) Better advice and guidance on the value of and options to control damage by

deer

g) Other - please specify in no more than 25 words

Encourage, facilitate and support the development of regional and local deer management strategies. Ensure before action, that there is clear research, evaluation and monitoring on how to

manage deer. Develop as broad partnership involvement as possible in the preparation of such an action plan or strategy for deer.

Which of these actions would be most effective in reducing the damage to trees and woodlands caused by grey squirrels? (select up to two options)

a) Making grey squirrel control a requirement of grant or felling agreements

b) Providing incentives for the management of grey squirrel

c) Researching contraception to prevent breeding

d) Reintroducing animals to help control squirrels, such as pine martens and goshawks

e) Providing better advice and guidance on grey squirrel control

f) Other - please specify in no more than 25 words

Further research is required on the most effective method for controlling grey squirrel in the UK, given how widespread this species is. Any management of grey squirrel populations would need to be targeted, and should be undertaken where practical, effective and economically viable.

Engaging people with trees and woodland: questions

Are any of the following significant barriers to securing and maintaining street trees? (select up to three options)

a) Appropriate standards and guidance for securing the right trees in the right places

b) Practical challenges in terms of street design, planting requirements and compatibility with other infrastructure provision

c) The adoption of street trees by local highway authorities, or alternative arrangements where streets are not adopted

d) The skills and resources needed to deliver new street trees, including funding for planting

e) The funding and skills for ongoing maintenance of street trees over their lifetime

f) Other – please specify in no more than 100 words

How could government overcome the barriers to securing and maintaining street trees you have identified in question 30? (Maximum 150 word response)

Biodiversity net gain provides a promising source of income to fund ongoing maintenance for the 30 year period following development; however, funding is also required for Local Authorities to maintain trees outside of net gain developments and to continue to manage trees after the 30 year period.

Which of these actions would be most effective in increasing the number/coverage of trees in and around urban areas? (rank the following options in order of preference)

a) Promotion through national policy (including England Tree Strategy and national planning policy) including recognition that trees and woodlands are key components of green infrastructure, with equal status to other green and built infrastructure

c) Development and implementation of Local Tree and Woodland Strategies and local planning policies - setting local targets for tree canopy cover and recognition that trees and woodlands are key components of green infrastructure, with equal status to other green and built infrastructure

b) Promotion through national guidance (such as green infrastructure, planning and design, and code/street guidance, e.g., Manual for Streets) - stronger inclusion of appropriate engineering solutions

f) Creating new community forests in areas of greatest need

d) Training for practitioners, including highways engineers and others

e) Providing better support for community forests in areas of greatest need

g) Other - please specify in no more than 25 words

Which actions would most help the preparation and implementation of local Tree and Woodland Strategies? (rank the following options in order of preference)

g) Strengthening technical expertise in tree and woodland management in local authorities

a) Preparing national guidance on developing Local Tree and Woodland Strategies

f) Adopting Local Tree and Woodland Strategies as supplementary planning documents

e) Standardising the approach to measuring the value of the urban forest resource

b) Setting local targets for tree canopy cover

h) Recognising trees and woodlands as key components of green infrastructure, with equal status to green and built infrastructure

d) Agreeing national data standards for urban trees

c) Using canopy cover as a measure to monitor the scale and development of the urban forest

Which actions would most effectively engage people in the management and creation of their local woodlands? (rank the following options in order of preference)

d) Enabling community groups to participate in the management of their local woodland

c) Enabling community groups to influence decision making about the management of their local woodland

g) Creating new community forests in areas of greatest need

f) Providing better support for community forests in areas of greatest need

a) Providing more training opportunities to support woodland management and creation

h) Supporting the growth of woodland social enterprise in and around towns and cities

b) Providing legal support to community groups for the acquisition or lease of woodland

e) Facilitating networks to exchange ideas and share good practice

Which actions by government would be most effective in addressing barriers to peoples' access to trees and woodlands? (rank the following options in order of preference)

c) Creating new accessible woodlands in and around towns and cities

e) Improving the quality of access by investing in infrastructure (car parks, trails, path surfacing, signage, seating)

b) Offering more generous woodland management incentives for those woodlands with public access

a) Supporting woodland access through existing incentives and rights of way

d) Supporting woodland access with bespoke incentives, simply to allow access

f) Regulating to maintain access rights when creating new woodland

g) Supporting people to become trained/accredited to better facilitate contact (learning and health) with nature

38. Which of these actions would best address the funding challenge for the planting and on-going maintenance of trees in urban areas? (select up to two options)

a) Making central funding available to supplement private finance for establishing trees in existing developments.

b) Using planning levers to require developers to plant trees relating to new development on streets and other public spaces

c) Using planning levers to raise funds for on-going maintenance

d) Ensuring the value of tree's longer term benefits are captured to access financing

e) Other - please specify in no more than 25 words

Supporting the economy: questions

What could the England Tree Strategy do to encourage the use of timber in construction? (select up to two options)

a) Improving, encouraging or incentivising the growth of necessary skills such as those in green construction, design or forestry

b) Promoting and incentivising Grown in Britain Certification

c) Encouraging planning requirements to incorporate sustainable materials

d) Amending public procurement standards to support Grown in Britain certified forest products, incorporate sustainable materials and signal long-term demand

e) Increasing the availability of knowledge and stimulate an understanding of sustainable building practices

f) Supporting new innovations in developing timber building materials such as cross laminated timber

g) Other - please specify in no more than 25 words

How could policy about the permanency of woodlands better support tree establishment for agro forestry or energy crops? (select one option)

a) Changing policy so it does not treat afforestation as a permanent land use change

b) Adjusting policy so energy forestry crops (short rotation coppice and short rotation forestry) are not permanent land use change

c) Retaining the current position whereby afforestation is generally a permanent land use change

d) Not sure

Which actions would best increase the uptake of energy forestry? (select up to two options)

a) Providing financial support for the capital costs of energy forestry

b) Clarifying the taxation of energy forestry (as either agriculture or forestry)

c) Clarifying the regulatory position for energy forestry (for example, can I change land use in the future)

d) Providing support to develop a secure supply chain (such as forward contracts for feedstock)

e) Providing better advice and guidance on energy forestry

f) Increasing skills capacity in energy forestry

g) Other - please specify in no more than 25 words

Which actions would best increase the planting of more trees on farms? (select up to two options)

a) Clarifying the regulation of agroforestry as either agriculture or forestry

b) Clarifying the implications for the land holding's tax status of planting more trees

c) Providing better advice and guidance on woodland creation and management

d) Providing incentives for a wider range of tree planting on farms

e) Funding for the advice and the design of schemes for trees on farms and agroforestry

f) Providing better advice and guidance on how woodland creation and management can contribute to farm business models

g) Other - please specify in no more than 25 words

Which actions would best increase agroforestry, woodland creation and management on tenanted farmland? (select up to two options)

a) Providing industry led guidance, best practice and case studies of how tenants and landlords can work together to deliver benefits for both parties from diversification into tree planting and agroforestry on tenanted land

b) Providing eligibility criteria for tree establishment grant agreements to discourage the proactive resumption of tenanted farmland

c) Reviewing how tenancy agreements approach the responsibility for and rights to trees

d) Confirming the property rights to long-term carbon benefits

e) Other - please specify in no more than 25 words