



England Tree Strategy 2020

Consultation submission on behalf of the Forest of Selwood CIC

Our response is not confidential.

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The Forest of Selwood.

Selwood is a deeply historic landscape on the eastern edge of Somerset which has been a recognisable, legal and physical entity since at least early Anglo-Saxon times prior to the Norman Conquest. Within its borders there are the towns of Frome, Bruton, Wincanton and the headwaters of five significant rivers: the Brue, Frome, Stour, Wylde and Cale. For over a millennium the Forest of Selwood has been shaped by its people, trees and wildlife.

As an historic entity, the Forest of Selwood was one of the landscape areas called Forests or Chases (like the New Forest), over which Forest Law operated. These were wild areas where populations of large wild herbivores and their habitat were actively conserved, enforced by laws and fines.

The Forest of Selwood links to other Mediaeval Forest areas: Forest of Gillingham, Cranborne Chase and New Forest to the south, north into Chippenham and Melksham and west to Mendip. Taken together, this forms a chain of landscapes from The Solent to the Cotswolds Scarp characterized by trees; in ancient woodlands, wood pastures, parks and hedgerows. **We would like to see this once historic boundary between the Angles and the Danes to be considered for a large-scale landscape nature recovery project.**

The Forest of Selwood Community Interest Company

The Forest of Selwood Community Interest Company comprises of local people, land managers and organisations as well as knowledgeable advisors committed to a better future for this special area. We collaborate with others that share our vision for the future, but it is essential to engage with land-managers as persuading them to contribute where they can to achieving the vision is paramount. Our aims are:

To revive and enhance wildlife.

Selwood is a quintessentially English landscape characterized by flower-rich meadows, ancient wood pastures, parkland and hedgerows as well as extensive ancient woodland. The vision foresees a better-connected landscape of

increasingly species-rich habitats, wilder river corridors that slow the flow, improved soil, air and water quality. Trees of all ages, but especially open-grown, lone trees and flowering native shrubs, play a special role in this.

□ **To slow climate change.**

The aim is to encourage regenerative agriculture, agro-forestry and forestry practices, habitat conservation and rewilding so that the landscape captures and holds carbon while reducing emissions of other green house gases.

□ **To connect people with a distinct and dynamic landscape which gives them a sense of identity with the land.**

The aim is to create a wildlife-rich, more resilient and adapted place for people to live and work, through the promotion and active conservation of natural beauty and cultural capital. For example, we helped establish setting up an Environmental Stewardship Facilitation Fund Group that has brought farmers together to protect and increase natural capital across the area.

The Forest of Selwood CIC found that the format and content of the questions in the Consultation Document make responding to the consultation very difficult. We consider that the consultation gives minimal attention to the wider, diverse treescape and the needs of communities. Therefore we are providing this response to the issues raised in each of the Pillars as well as a response to the official document.

Summary of Response

Forest of Selwood CIC is keen to see that sufficient attention and funding goes into environments beyond large-scale commercial plantations and managed woodlands. We want to see a strategy that clearly identifies and promotes open-grown trees (especially ancient and other veteran trees), hedgerows, community orchards, street trees and urban parkland, riparian trees, and the wood pasture and parkland – these are the priority habitats that hold our precious ancient trees.

The quality of our local landscape is of economic value to us through tourism and opportunities for branding of services and products not just through timber production. Forest of Selwood would welcome recognition of the landscape value of the area through a designation similar to AONB. This would give it a long-term sense of place as an entity around which the community could come together to build a shared vision of the future.

1. It is important that communities like ours can see that public money is going into public good.

We share the Minister of State's view (Page 1) that there is a need to establish "*trees across the country in all settings and through a range of approaches; ensuring we encourage the right tree in the right place.*" This means making sure sufficient attention and funding goes into environments beyond large-scale forests and managed woodlands. Quality is more important than just quantity, but will substantially also address key issues of biodiversity and carbon capture. We would wish to see natural regeneration as a priority using natural processes because it is the most cost effective and has the least plastic or carbon footprint.

2. The Strategy must support local initiatives that have strong, shared vision for trees and woodlands.

3. The strategy should adopt a target of ten times the number of existing lone trees (22.1 million/ 2.6% canopy cover see Woodland Natural Capital Accounts UK 2020) in the landscape, each one providing twenty times the value of a single plantation tree in biomass production as well as other ecosystem services.

The achievement of which would create an estimated canopy cover of 26%; partly mitigating the massive losses from hedgerow removal, decimation of wood pasture and parkland trees, Dutch elm disease and ash die-back. The Strategy must support the integration of individual, lone and small groups of trees in farmland, upland, river catchments and urban areas.

4. There must be greater emphasis on tree diversity in the strategy.

There is insufficient emphasis in the strategy on open-grown trees and flowering shrubs. Without tree diversity, the Strategy will miss the opportunity to support the creation of a wide range of habitats. The quality of the treescape has more value to wider society than a large number of trees of little public benefit and the realisation of this is growing in the Forest of Selwood area.

5. The strategy must support as strong an investment in biodiversity as it does in carbon sequestration.

It must support the protection, maintenance, restoration and creation of wood pasture and parkland, orchards, riparian corridors and hedgerows as well as pockets of woodland, lone or open-grown trees especially mature, ancient and veteran trees. The minimum targets for veteran trees and decaying wood habitats within woodland stands as required by UKFS must be achieved (see Woodland Natural Capital Accounts, Condition of Woodland, section 3). The government needs to encourage much research into how trees in all situations and not just plantation planting helps to improve soils, prevent run-off entering river systems, sequester carbon as well as provide biodiversity, beauty and contribute to future landscape quality.

6. The government needs to take the lead in setting out interactive mapping methodologies and create consistency of approach across England, empowering communities to contribute local knowledge to maps at both the strategic and implementation level.

Such an approach enables groups like FoS to undertake detailed mapping of the trees and habitats in the area, work with the community and put the right trees in the right places and right spaces (lone trees) for the right reasons. Current provision via MAGIC is not sufficiently detailed; it lacks all the required information/ layers (eg the Ancient Tree Inventory is absent and the wood pasture and parkland layer has not been ground-truthed); and it does not allow local interaction to update or undertake opportunity mapping.

Specific response to Pillars 1 – 4.

Pillar 1: Expanding and connecting our trees and woodland

We are pleased to note that the ETS Technical Annex states:

“Wood pasture is a type of woodland habitat recognised as having its own inherent value as a priority habitat. Traditionally, grazing animals were raised alongside trees, on the same area of land. Such land management systems date back centuries,

even pre-dating some ancient woodlands. **Their value for biodiversity and their aesthetic and cultural value will not go unrecognised in the delivery of the tree planting ambitions.**" (Page 18)

And

"... a Defra-commissioned report shows individual trees are being lost from the landscape faster than they are being replaced. However, trees outside woodlands have a high biodiversity value; the majority in lowland rural landscapes are found in hedgerows and make an important contribution to connectivity and ecological functioning of landscape" **It is acknowledged that large mature and ancient trees provide significant ecosystem services.** (Page 6)

As public goods come from a variety of trees in different situations, Forest of Selwood CIC would wish to see the ETS embrace the following approaches:

- **Support mechanisms that sustain mature and ancient trees and priority treed habitats** (open-grown ancient and veteran trees, ancient woodland and wood pastures, orchards and hedgerows and their valuable soils). According to experts such as those in the Ancient Tree Forum there are not enough initiatives preventing avoidable loss or damage – regrettably there has been no government assessment of the issue despite their international importance. Expanding and tightening the regulations requiring tree owners to seek advice before felling or doing works to important trees which can fall through the current framework is long overdue. We would welcome a government campaign to highlight the ecosystem and landscape value of such trees. Tree owners need direction and empowerment to implement this approach.
- **The strategy must support establishment of high quality (rather than just quantity) tree planting.** Wood pastures, hedgerows, orchards, in-field and urban trees need continuity of tree replacement. These trees and habitats should be recognised for the carbon that they already hold and can continue to sequester in the long term and therefore be able to secure carbon credits in their own right. The government needs to initiate more research into the benefits of these trees and habitats in relation to the amount of carbon that they can sequester. A one-size fits all tree planting grant scheme is unlikely to provide the right result. We would wish to see natural regeneration as a priority using natural processes because it is the most cost effective and has the least plastic or carbon footprint.
- **Protection and establishment of individual/lone trees and open treed habitats on farms should be promoted through the Environmental Land Management Scheme.** FoS would like to see more clearly how this strategy links with ELM and also other government legislation (e.g. Environment Bill), policies e.g. planning and guidance e.g. TPO. It will of course be far more effective if there is good integration from the start.
- **Long term best practice care of trees, beyond the first years of planting, needs to be encouraged.** While trees, and mature or older trees in particular, have a valuable role to play in reducing air pollution, ameliorating damaged soils, reducing run-off and improving water quality, they can also be damaged by poor management practice and poor growing conditions which make them less able to resist disease and adapt to a changing climate. In terms of nationally significant

trees (especially ancient and other veteran trees) the international standards established by VetCert should be incorporated in UKFS and other government led standards schemes.

- **Develop an accessible GIS app to facilitate tree management and community planting schemes.** Mapping the tree and priority habitat resource is very important so that we can prioritise resources in the right place. MAGIC is an incomplete resource, does not allow opportunity mapping and needs regular updating to be of value. This will require investment so that a consistent approach is applied across the country. Mapping new initiatives will need the detail to be digitised as small changes must be captured and counted. Mapping will need to be accessible to local communities which may need support with training to develop their GIS skills. Where inventories are incomplete (e.g. the Ancient Tree Inventory which records ancient and other veteran trees of national importance, the wood pasture and parkland, hedgerow and orchards inventories) there should be initiatives to bring them up to date and to maintain them. In the short term where information is incomplete it is important that there are experienced advisors available to inform strategies and owners about how to appropriately manage their treescapes. Mapping would also help collaboration between land-managers, individuals, local organisations, NGOs, local and national government and agencies.

Pillar 2: Protecting and improving our trees and woodlands

- **The ETS does not give ancient and veteran trees, and the spaces they occupy, a significance and importance commensurate with their value to society.** Although the majority of important, often nationally significant veteran and ancient trees are outside 'woodlands' as defined by the National Forest Inventory (NFI) (*Woodland Natural Capital Accounts, UK 2020*), they are a key characteristic of very open (>10% canopy cover) woods such as wood pastures and parkland, in hedgerows, along river banks, in orchards and as in-field trees. The decaying wood characteristics which develop in veteran and older ancient trees are '*a boost to biodiversity as they create unique micro-habitats supporting a wide range of other organisms*' (NFI condition indicators, Section 3) are a factor of the age of the tree. The older the tree the more likely it is to host exceptionally rare species. Research undertaken by the IUCN demonstrates that the loss of old trees threatens the survival of red-listed wood-dependent insects.
- **The strategy must call on Parliament to give ancient and veteran trees the same protection as heritage assets in the built environment.** As the UK, England and the Forest of Selwood in particular, have some of the most important veteran and oldest ancient trees in Europe it is very important that the England Tree Strategy recognises their significance and proposes mechanisms to safeguard and sustain their values into the future. They are national, if not international treasures and should be given a status or designation that indicates their value to society.

There is some protection in town and country planning policy for ancient woodland, wood pastures and parkland trees. However, current regulation and statutory law does not prevent pre-emptive felling of individual ancient and other

veteran trees due to the 5 cu m per quarter felling licence exemption, garden exemption or where the tree is not subject to a Tree Protection Order or in a conservation area.

- **The ETS must provide clarity over the status of wood pasture and parkland.** In [Standing Advice](#), ancient wood pastures and parkland are called a woodland habitat and protected as irreplaceable habitat. Yet in the NFI it is not classified as woodland. This leads to confusion and more significantly that this internationally valuable habitat falls between two stools and is therefore overlooked in identification of value, designation, mapping, protection and incentivisation of restoration, buffering and creation. It falls in between the policy making for forestry and agriculture and has negligible support, even from nature conservation interests.
- **The UK Forestry Standard (UKFS) needs revision as it applies primarily to an afforestation approach to planting and this is not a recipe for all situations.** The UKFS should encompass the provision and care of open-grown trees and priority habitats (those categorised as woodland with >10% canopy cover which is the international definition of forests [FAO](#)) including veteran trees and decaying wood habitats. The [Woodland Natural Capital Accounts, UK 2020](#) Section 3 state that “*The presence of veteran trees in a woodland is considered a boost to biodiversity as they create unique micro-habitats supporting a wide range of other organisms*”. The NFI considers a woodland as being in a favourable condition when two or more veteran trees are present per hectare. The inventory classified only 0.5% of all woodland area as favourable for veteran trees. Furthermore, the Woodland Natural Capital Accounts 2020 state “*Deadwood is important for woodland biodiversity. It provides an important habitat for small animals, cavity-nesting birds, insects dependent on decomposing wood and decomposer fungi*”. The NFI considers a favourable condition for deadwood to be greater than or equal to 80 cubic metres per hectare for volume of deadwood lying or standing. Of all woodland in Great Britain, just 6.1% is considered favourable for deadwood. These appalling statistics show clearly the application of the standard needs urgent reform. They show over-whelming non-compliance, yet little or nothing has been done to address it. It is also a disincentive for alternative approaches where adherence to the standard is a prerequisite for funding.
- **EIA regulations should remain in place.** The Forest of Selwood CIC is concerned that if EIA regulations are watered down, mistakes will happen and important trees or habitats will be damaged, eg planting on herb-rich pasture.

Pillar 3: Engaging people with trees and woodland

- **We support the idea that local authorities produce local tree strategies** but they must take account of landscape scale initiatives such as the Forest of Selwood where the community is already actively engaged in collaborating with land owners, tree managers and residents.
- **The strategy must draw on the resources of groups such as Forest of Selwood or many opportunities will be lost.** FoS has activated the power of ancient and remarkable trees in engaging people. Although the area is still under-recorded, there are already approximately 100

ancient trees on the Ancient Tree Inventory within the FoS area each one with a story to tell of the landscape.

- **FoS welcomes the commitment to more trees in new developments.** However we would like to see the quality of the proposed treescape prioritised over quantity of trees to be planted. Tree planting in England should not be a mere 'numbers game'.

Pillar 4: Supporting the economy

- **It is FoS view that the right trees benefit the economy whether it is improving the resilience of the farmed landscape or enhancing the urban environment.** However we would be disappointed if large scale afforestation was to take place in our area without a full consultation on the pros and cons of such an approach which might be contrary to our aims and vision.
- **Entry into the Environmental Land Management Scheme should include compulsory protection for, and enhancement of, the tree stock on the farm.** This could include easy wins for the landowner such as identifying and actively conserving ancient and veteran trees on the farm, short-term fencing off areas from browsing mammals to allow establishment of trees and shrubs, planting and protecting a certain number of landscape trees in hedgerows and copses per hectare. The appropriate density could be determined through reference to landscape characterisation mapping.

The Strategy should encourage and foster innovation in establishing the nation's tree stock.

The grant system is based upon the establishment of a certain density of trees per hectare. This does not allow for innovation and experimentation. It does not allow failure. Land-managers should be able to experiment in site preparation, seeding, planting, tree protection, weed control and species choice.

England Tree Strategy - Questions

Pillar 1: Expanding and connecting our woodlands: questions

6. 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 landowners 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 **Supporting a diversity of establishment from single/ lone tree to parkland/ plantation by planting and regeneration and making the public good from trees very explicit.**

7. Which actions would be most effective in addressing the financial barriers that prevent the creation of new woodland? (select a 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
- 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 landowners 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) **Supporting a diversity of establishment from single/ lone tree to parkland/ plantation by planting and regeneration and making the public good from trees very explicit.**

8. 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) The strategy must support as strong an investment in biodiversity as it does in carbon sequestration.

9. 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 **Investment in tree/s that play a multifunctional role eg silvo-pastoralism, 3-tier agriculture, hedgerows, orchards, parks to create beauty and biodiversity.**

10. Which actions would be most effective in addressing the non- financial 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 landmanagers 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 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) **Investment and guidance** in tree/s that play a multifunctional role eg silvo-pastoralism, 3-tier agriculture, hedgerows, orchards, parks to create beauty and biodiversity.

11. 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 **The UK Forestry Standard needs to fit more than just commercial forestry to allow flexibility in numbers of trees for different outcomes/ local priorities.**

12. 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) **The UK Forestry Standard needs to fit more than just commercial forestry to allow flexibility in numbers of trees for different outcomes/ local priorities.**

13. How can we most effectively support the natural establishment of trees and woodland in the landscape? (Maximum 100 words) **Natural regeneration should be managed/integrated with grazing so that wood pasture or parkland is the outcome and a carbon value established for this land management system.**

14. 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) **Forest of Selwood believes collaboration is the key underpinned by an inspiring vision of the landscape in which biodiversity and heritage is as important as carbon capture. It must be clear that public funds are for**

public benefit. The strategy should adopt a target of ten times the number of lone trees in the landscape, as single trees can be integrated with all land uses and every lone tree provides 20 times the ecosystem services of a single plantation planted tree. Detailed maps showing opportunities for establishing right tree in right place and right space and capture activity towards targets.

15. 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 watercourses, 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 A one-size plantation style scheme is not appropriate for many/ all locations - utilitarian fenced tree strips/plantation along river banks will be unsightly and of less ecosystem benefit than a diversity of approaches.

16. What role could the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover? (Maximum 150 word response) Many National Parks and AONBs have upland or hilltop areas that have been 'sheep-wrecked' and are devoid of trees or are losing them rapidly. Common land is being abandoned. We need a diversity of approaches that recognises the value of wood pasture as a viable agricultural system that incorporates trees to the benefit of the farming system, the landscape and biodiversity.

Pillar 2: Protecting and improving our woodlands: questions

17. 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. It is difficult to know what exactly is proposed by these answers and would be different between woodlands and lone/individual trees - e.g no questions relating to buffer zones.

18. 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 Changes to Felling Licence regulations by removing the 5 cu m per quarter exemption in relation to ancient, veteran and notable trees.

19. What actions would be most effective in reducing the use of plastics in forestry? (select one option)

- a) Providing support to land managers for deer control and fencing
- b) Supporting further testing and trial of non-plastic alternatives such as tree guards
- c) Introducing stronger control on the recovery and disposal of plastics in grant agreements and public sector contracts for woodland creation and management
- d) Promoting the use of non-plastic tree guards
- e) Other (please specify in no more than 25 words) Creating a target for natural regeneration and especially wood pasture and parkland using innovative methods such as natural thorny shrubs as tree guards.

20. Which actions would overcome financial barriers to woodland management? (select all that apply)

- a) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products
- b) Providing grant support for a wider range of management activities
- c) Providing grant support for the restoration of Plantations on Ancient Woodlands Sites (PAWS)
- d) Providing support for woodland infrastructure such as roading
- e) Providing grants or loans for equipment, for example, harvesters
- f) Support to increase the productivity/supply chains for woodland products

- g) Support for land owner collaboration in woodland management
- h) Government requiring more domestic timber through procurement policies
- i) Other - please specify in no more than 25 words Providing adequate grant support and mechanisms for collaboration for the management of ancient and other veteran trees and wood pasture and parkland, hedges with trees and orchards.

21. Which actions would be most effective at overcoming the financial barriers to woodland management? (select up to three options)

- a) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products
- b) Providing grant support for a wider range of management activities
- c) Providing grants support for the restoration of Plantations on Ancient Woodlands Sites (PAWS)
- d) Providing support for woodland infrastructure such as roading
- e) Providing grants or loans for equipment, for example, harvesters
- f) Support to increase the productivity/supply chains for woodland products
- g) Support for land owner collaboration in woodland management
- h) Government requiring more domestic timber through procurement policies
- i) Other - please specify in no more than 25 words Providing adequate grant support and mechanisms for collaboration for the management of ancient and other veteran trees and wood pasture and parkland, hedges with trees and orchards.

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 awards¹⁴)
- 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 Improving public recognition of the value of ancient and other veteran trees, wood pasture and parkland, hedges with trees and orchards to inspire landscape diversity.

23. Which actions would be most effective at overcoming the non- financial 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) Suitably trained skilled workers such as conservation arboriculturalists and specialists in wood pasture and parkland and restoration of woods on 'difficult' sites

24. 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 landowners to manage their woodland
- d) Other - please specify in no more than 25 words. **We do not wish to see any of the above but instead good regulation which is fit for purpose and knowledgeable regulators adequately resourced to be able to negotiate effectively with clients in a timely way.**

25. 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 landowners to manage their woodland
- d) Other (if added, your own entry to question 23) **We do not wish to see any of the above but instead good regulation which is fit for purpose and knowledgeable regulators adequately resourced to be able to negotiate effectively with clients in a timely way.**

26. 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) **If Forest of Selwood owned an SSSI, would want suitable advisory service to help with development of management plans and that the land would receive appropriate ecosystem services credits. We would want to see a clear link between public goods and payments to act with appropriate controls (carrot and stick).**

27. 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 **The 'Plant Healthy' standard should be mandatory for all. Nurseries have been a major source of the current problems but do not pay for the impacts which is usually picked up by the tax payer.**

28. 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 longterm 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**

Comment: The above choices are to help mitigation with least damage and contribute in the long term. It should include lone trees, hedgerows with trees, orchards and wood pastures and parkland which will provide much longer term mitigation than forestry options. In the case of Agro-forestry we are primarily interested in silvo-pastoral systems. Item (f) indicates that Felling Licence regulation at present is inadequate and if so would welcome further regulation.

29. 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 **Support for the restoration and creation of deer parks (wood pasture and parkland) with traditional or historic deer leaps as 'sinks' that allow deer to enter but not leave.**

30. 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 Restoration and protection of natural predators within the landscape would increase wildlife interest and engagement in the landscape.

Pillar 3: Engaging people with trees and woodland: questions

31. 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

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

There should be active promotion of the benefits of street trees and collaboration with community groups such as Tree Warden schemes to ensure there is involvement in establishment, aftercare and long-term retention of street trees and local parks. It is not just about streets but providing open spaces with trees for relaxation and recreation especially where they can provide corridors or connectivity with the wider countryside.

33. 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)

- 1. 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
- 3. 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
- 2. 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
- d) Training for practitioners, including highways engineers and others
- e) Providing better support for community forests in areas of greatest need
- f) Creating new community forests in areas of greatest need
- g) Other - please specify in no more than 25 words The attraction of historic parks and gardens shows people want a mix of open spaces to more dense tree cover for different purposes but especially natural/ beauty.

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

- 2 a) Preparing national guidance on developing Local Tree and Woodland Strategies
- b) Setting local targets for tree canopy cover
- c) Using canopy cover as a measure to monitor the scale and development of the urban forest
- d) Agreeing national data standards for urban trees
- e) Standardising the approach to measuring the value of the urban forest resource
- 3. f) Adopting Local Tree and Woodland Strategies as supplementary planning documents
- 1. g) Strengthening technical expertise in tree and woodland management in local authorities
- 4. h) Recognising trees and woodlands as key components of green infrastructure, with equal status to green and built infrastructure

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

- a) Providing more training opportunities to support woodland management and creation
- 3 b) Providing legal support to community groups for the acquisition or lease of woodland
- 1 c) Enabling community groups to influence decision making about the management of their local woodland
- d) Enabling community groups to participate in the management of their local woodland
- 2 e) Facilitating networks to exchange ideas and share good practice
- f) Providing better support for community forests in areas of greatest need
- g) Creating new community forests in areas of greatest need
- h) Supporting the growth of woodland social enterprise in and around towns and cities

36. 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)

- a) Supporting woodland access through existing incentives and rights of way
- 2. b) Offering more generous woodland management incentives for those woodlands with public access
- 3. c) Creating new accessible woodlands in and around towns and cities
- d) Supporting woodland access with bespoke incentives, simply to allow access
- e) Improving the quality of access by investing in infrastructure (car parks, trails, path surfacing, signage, seating)
- 1. 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

37. Which of the following do you most value about trees and woodland?

(select up to two options)

- a) Places to exercise and relax and engage with nature
- b) Places for nature
- c) A source of sustainable products and employment
- d) A resource that provides water management
- e) A resource that cleans the air
- f) A resource that stores carbon
- g) As a feature within towns and cities
- h) As part of urban green space

i) Other - please specify in no more than 25 words. **Trees add beauty, have historic and cultural values and add seasonal diversity. They create a long term sense of place or belonging for local people.**

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.

Pillar 4: Supporting the economy: questions

39. 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

40. 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

41. 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

42. 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. **We support the establishment of silvo-pastoral systems on farms rather than intensive agro-forestry systems.**

43. 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

44. What are the most urgent shortages in the workforce capacity needed to increase woodland creation, maintenance and management? (select up to two options)

- a) Professional forester
- b) Supervisor for forest works
- c) Machine operator, for example, tractor / harvester / forwarder drivers
- d) Hand cutter / chainsaw operator
- e) Tree planter
- f) Tree nursery workers
- g) Forestry educators
- h) Land agents, surveyors and architects with specialist forest knowledge
- i) All of the above
- j) Other - please specify in no more than 25 words. **These questions overlook other professions such as arboriculturalists and ecologists that have a very important role to play in looking after trees - especially ancient and veteran trees and in advising land-managers on their plans and choice of options which are not mainstream forestry.**

45. Which actions would best strengthen productivity in forestry supply chains? (select up to three options)

- a) Providing grant support for wider range of management options
- b) Providing support for woodland infrastructure such as roading
- c) Providing grant or loans for equipment (for example, harvesters)
- d) Providing support for productivity/supply chains for woodland products
- e) Providing better information on market prices and opportunities

- f) Training to increase the skills capacity in agricultural workers
- g) Facilitating collaborative working between woodland owners
- h) Developing options for private investment for ecosystem services that drive woodland management
- i) Other - please specify in no more than 25 words. **Please assure us that public money will be for public good and not just to support increased productivity which the marketplace alone should be supporting.**