

## England Tree Strategy consultation

CPRE The countryside charity

September 2020

By email to: [Tree.Strategy.Consultation@defra.gov.uk](mailto:Tree.Strategy.Consultation@defra.gov.uk)

Dear Defra Tree Strategy team,

Thank you for the opportunity to comment on the England Tree Strategy (ETS) consultation. We set out the key issues for CPRE below and support the response submitted by Wildlife & Countryside Link. CPRE also wishes to draw Defra's attention to areas that we believe have been omitted from the consultation, in particular the importance of hedgerows and a landscape character approach.

CPRE is the countryside charity that campaigns to promote, enhance and protect the countryside for everyone's benefit, wherever they live. With a local CPRE in every county, we work with communities, businesses and government, nationally and locally, to find positive and lasting ways to help the countryside thrive.

### Key issues for CPRE:

#### 1. Trees and planning

CPRE believes that the planning system is integral to protecting and enhancing existing trees and woodland. We welcome the ambition set out in the consultation to expand the public forest estate and restore degraded land. However, we believe that wherever suitable, previously developed and/or degraded land should be prioritised for built development, such as housing, as this helps to avoid destruction of valuable habitat elsewhere (although some brownfield sites have wildlife value too). Even with stronger protections in the National Planning Policy Framework (NPPF), over 1,000 ancient woodlands and trees were under threat from development<sup>1</sup>, despite CPRE research that identified space for 1 million homes on previously used and degraded brownfield land<sup>2</sup>. We urge Defra to consider the detail of this policy as stated in the consultation, so that the final ETS does not inadvertently encourage the diversion of development from appropriate brownfield/degraded land to greenfield in order to meet tree planting targets.

We welcomed the updates to the NPPF to protect ancient woodland and trees, yet continued pressures on this habitat suggests greater collaboration is needed between government departments to ensure that other planning policies do not outweigh those designed to protect and enhance nature. The final ETS should encourage more national recognition for ancient woodland and trees. Local authority planning departments need more guidance and training to implement updates to the NPPF and we understand other NGOs have already issued best practice guidance<sup>3</sup>.

There is also concern that permitted development rights (PDRs) are occasionally cited by woodland owners as a

<sup>1</sup> Woodland Trust press release, January 2020: <https://www.woodlandtrust.org.uk/press-centre/2020/01/thousand-threatened-ancient-woods/>

<sup>2</sup> State of Brownfield 2019. CPRE, March 2019: [https://www.cpre.org.uk/wp-content/uploads/2019/11/State\\_of\\_Brownfield\\_2019.pdf](https://www.cpre.org.uk/wp-content/uploads/2019/11/State_of_Brownfield_2019.pdf)

<sup>3</sup> <https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>

way to develop ancient woodland over time. We understand that many woodland sales have restrictive covenants attached to the land to ensure that the integrity of the ancient woodland is maintained - although this can often rely on enforcement by councils. We believe that the ETS should recognise that the protection of ancient woodland could be undermined if there is ambiguity about PDRs<sup>4</sup>.

CPRE agrees that Tree Preservation Orders (TPOs) are a valuable tool to preserve trees or woodland and that work is needed to bring the system up-to-date and ensure they are applied and enforced with consistency. Any update to the TPO system should consider the wider benefits provided by trees and woodland<sup>5</sup>, including but not limited to those mentioned in this consultation (e.g. p3, p21, p27-28, p33). Clarifying criteria to recognise these benefits could help to protect more habitat, but only if it *broadens* the criteria to make it easier for a TPO to be issued. For example, accepted evidence of carbon sequestration by a tree must be generic (e.g. for that species), given communities are unlikely to have specialised equipment required to measure this locally.

While we welcome the ambition of biodiversity net gain as referred to in the consultation, to be an effective way of channelling private investment into tree and woodland conservation it must be additional to existing requirements and not supersede the mitigation hierarchy. CPRE endorses key principles<sup>6</sup> produced by Wildlife and Countryside Link for net gain to be effective and urges Defra to ensure they are met in the final Tree Strategy.

## 2. Trees and climate change

CPRE agrees that existing trees and woodlands, significant new planting and natural regeneration, will have a vital role in tackling the climate emergency. The Nature for Climate Fund, along with ELMS, will be important funding streams to enable these aspirations to be delivered on the ground.

CPRE believes that any nature-based solution to climate change must take account of the local distinctiveness of the landscape and we elaborate on this point below. For example, tree planting should not be done en masse in monocultures, but rather by planting the species and quantities that best suit the character of the individual landscape.

We agree with the consultation narrative that allowing more natural regeneration will help ensure trees and woodlands continue to 'grow vigorously in our future climate and contribute to the mitigation of climate change'. Natural regeneration is a great way to create new woodland that benefits wildlife, enhances landscape character and benefits the local environment. Trees established by regeneration are more likely to be better adapted to local conditions so making them more resilient in the future.

Natural England studies on the potential impacts of climate change on five areas<sup>7</sup> found in relation to trees that the most common effect reported is an increase in storm damage affecting veteran and mature trees, designed landscapes and even aged plantations. There are many initiatives underway to help trees and woodland become more resilient to climate change, such as the National Association of AONBs' 'Colchester Declaration' which highlights the significant contribution AONBs can make to climate change and nature recovery. It includes a pledge that by 2030 'at least 36,000 ha of new woodland will have been planted or allowed to regenerate in AONBs following the principle of the right tree in the right place'.<sup>8</sup>

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<sup>4</sup> <https://www.woods4sale.co.uk/information-pages/woodland-planning-permission.htm>

<sup>5</sup> e.g. *Benefits of Urban Trees*, Food and Agriculture Organisation (April 2016): <http://www.fao.org/3/a-c0024e.pdf>

<sup>6</sup> *Key principles for Biodiversity Net Gain to be effective*. Wildlife and Countryside Link:

<https://www.wcl.org.uk/docs/Wildlife%20and%20Countryside%20Link%20key%20principles%20for%20a%20successful%20biodiversity%20net%20gain%20policy%20FINAL%20May%202016.pdf>

<sup>7</sup> <http://publications.naturalengland.org.uk/category/5978088475197440> (2013)

<sup>8</sup> [https://landscapesforlife.org.uk/application/files/7815/6326/2583/The\\_Colchester\\_Declaration.pdf](https://landscapesforlife.org.uk/application/files/7815/6326/2583/The_Colchester_Declaration.pdf) (2019)

### 3. Urban and street trees

CPRE welcomes the ambition to create green and healthy places to live. We agree that the urban forest – all the trees in urban areas, in public and private spaces – is a key part of our green infrastructure and of growing importance for climate change adaptation such as for urban cooling. CPRE supports the consultation proposal to develop ambitious local tree canopy cover targets and the promotion of urban trees, as this is a good starting point to improve the aesthetics of new and existing settlements (Q33). However, using these in isolation will fail to create green infrastructure that delivers for people and nature. Guidance must be provided so that local authorities consider spatial and ecological aspects within localised strategies, for example to ensure native species are prioritised, planting occurs in suitable locations, improving access to nature and that there is a long-term maintenance plan for newly planted trees. Strategies should be informed by landscape evidence e.g. local Landscape Character Assessments and policies such as the emerging local nature recovery strategies. They should also ensure local communities are involved to encourage ownership of the urban forest. A good example of this collaborative process is the ‘Sheffield Street Tree Partnership Working Strategy’<sup>9</sup>, produced following high profile public interest in the management of this resource.<sup>10</sup>

Existing street trees are also important and do not have enough profile in the ETS consultation, despite recognition that ‘Street trees are a key component of the urban forest’. The context of local authority budget cuts is not acknowledged in the ETS, which for example has led to arboricultural teams being reduced and trees lost to disease and old age not being replaced due to the cost. One way of tackling the problem of councils affording trees is via a council-community partnership like Plant your Postcode<sup>11</sup> in Brighton, Sussex, where streets can fundraise for their trees. This also means that people are more engaged in their maintenance and value the assets.

We must re-iterate that tree planting in new developments should be in addition to other policy mechanisms for habitat creation, such as biodiversity net gain, and not implemented at the expense of other green infrastructure, for example where other approaches are more appropriate, such as green walls in confined settings or hedgerows in areas where trees might block light.

### 4. Engaging people with nature

There is much awareness of the value of trees and woodlands to people, which has become even more important as people seek a connection to nature during the Covid-19 pandemic. CPRE agrees with the aspiration to increase the outreach of Community Forests with schools, building on and expanding the success of Forest Schools. Connecting children and young people to nature and an appreciation of trees and woodlands is integral to the future of both.

We strongly support the creation of new Community Forests in areas of greatest need and benefit to people, and for better support to be given to existing ones. CPRE believes that community engagement is vital to the future success of local woodlands, for example by working with community groups to influence decision making about the management of their local woodland and offering opportunities to participate in its management.

Community orchards<sup>12</sup> are increasingly popular, along with the opportunities for local food production. We believe they should be referred to in the final ETS, in the same section as community forests (‘Engaging people with trees and woodland’).

As the consultation mentions, it is important to address the barriers people face to accessing trees and woodlands, especially in places near to where people live. Initiatives such as colour coded circular walks often

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<sup>9</sup> *Sheffield Street Trees Partnership Working Strategy*. Multiple organisations (July 2020) : <https://www.wildsheffield.com/wp-content/uploads/2020/03/FINAL-Sheffield-Street-Tree-Partnership-Working-Strategy-July-2020.pdf>

<sup>10</sup> *Sheffield Trees and Woodlands Strategy 2018-2033*. Sheffield City Council (December 2018): <https://www.sheffield.gov.uk/content/dam/sheffield/docs/parks-sports-and-recreation/trees-woodlands/Sheffield%20Trees%20and%20Woodlands%20Strategy%202018-2033.pdf>

<sup>11</sup> <https://plantyourpostcode.org/>

<sup>12</sup> <https://www.theorchardproject.org.uk/>

found in Forestry England woods and Miles Without Stiles routes in several National Parks, should be expanded to more woodlands. Communicating the restorative benefits of time in nature to a wide an audience as possible, such as through recruiting community champions, will be critical in breaking down any barriers people may have to visiting nearby woodlands.

## 5. ELMS and agroforestry

The ETS must be integrated with the design of ELMS, which represents a huge opportunity to deliver more tree planting and woodland, as well as to encourage natural regeneration where suitable.

We agree with the ETS consultation paper that there is a need for clearer policy and incentives to support the uptake of agroforestry across England. This should be integrated with other Defra initiatives such as the Nature for Climate Fund, ELMS and the England Peat Strategy.

New policy will need to overcome the current separation within the Common Agricultural Policy of forestry and agriculture and consider barriers to uptake such as short-term tenancies and contract farming. Measures needed include better guidance and information on benefits, costs and solutions; grants towards capital costs of planting and maintenance; support for skills training in agroforestry; cross-governmental support for developing processing capacity for new products and exploration of potential innovative market-based mechanisms such as equity release schemes for timber and forward supply contracts. The final ETS should also refer to traditional orchards as an important form of agroforestry, to help reverse the decline since the 1950s.<sup>13</sup>

CPRE has submitted a detailed response to the recent Defra consultation on the ELM scheme and has called for tier 1 to include support for the planting, protection and maintenance of trees and for agroforestry. Trees combined with annual crops or livestock can be integrated into arable and livestock farming across much of the country, with benefits to overall productivity and efficiency of systems with multiple environmental benefits. Although tree planting is targeted under tier 2 there was no mention of agroforestry in the ELMS Policy Discussion Document, despite the government's 25-year Environment Plan (p48-49) referring to it as an aspect of ELMS. We believe agroforestry fits better under tier 1 for its potential to deliver multiple benefits to productivity, for example:

- a. Protecting and stabilising vulnerable soils from wind and water erosion
- b. Providing wind protection for crops and shelter for livestock
- c. Adding organic matter to soils and nutrient recapture and cycling back to crops
- d. Extending solar capture beyond annual crops' growing season
- e. Providing habitat for pollinators and pest predators
- f. Providing fodder diversity and resilience during drought/winter and medicinal browse for livestock
- g. Diversifying farm food and other outputs (orchard and soft fruits, nuts, timber, juices) and increasing financial resilience.

Agroforestry can also support wider environmental system benefits such as producing biomass or carbon storage, improving water quality and flood management, especially via riparian strips, and enhancing the landscape.

The government has ambitious plans for tree planting but needs to rapidly increase planting for England from current rates of around 2,000 hectares per year to 10,000 hectares per year by 2025. Agroforestry should contribute trees and area to those targets. It should be explicitly supported by ELMS as one way to increase planting rates by overcoming landowner and manager resistance to loss of productive land to permanent tree cover. This would also help ensure tree planting delivers multiple benefits including increasing the carbon stored by the farming/land management system.

CPRE notes that an important ambition of the ETS is to maintain high tree planting rates to 2050 to support decarbonisation pathways to net zero. If this is not to be undermined, effective and ambitious action is also

<sup>13</sup> <https://ptes.org/campaigns/traditional-orchard-project/traditional-orchard-decline/>

needed on peat. In our response to the England Peat Strategy consultation, we shared our analysis that it is vital that the government sets a high ambition for rewetting, sustainable management and restoration of peatlands. Otherwise, offsetting UK peatland emissions through tree planting would use up the total net negative CO<sub>2</sub> emissions from all UK forests both current and projected. Based on current government tree planting ambitions (30,000 hectares per year by 2025), an estimated 18.5 million tonnes of carbon dioxide equivalent emissions would be captured through new and existing forests annually, but not before 2050 to 2055. That is why action to stop emissions from degraded peatland must go hand in hand with other natural solutions like tree planting – and why the ETS must be integrated with the England Peat Strategy.

## Omissions in the consultation

CPRE contends that there are two key omissions in the ETS consultation and encourages Defra to consider their inclusion in the final Tree Strategy.

### **Hedgerows**

The importance of hedgerows is ignored in the consultation. While there are references to the value of hedgerow trees, there is no mention of the significant contribution hedgerows make to wildlife, landscape, cultural heritage and their role in helping to tackle the climate emergency. CPRE recently published *Greener, Better, Faster*<sup>14</sup>, which set out countryside solutions to the climate emergency and for a green recovery. One of our recommendations is to 'invest in the restoration and planting of England's hedgerows, to achieve at least a 40% increase in their length by 2050' - as recommended by the Climate Change Committee (in the same section as the call to increase woodland planting).<sup>15</sup> There is a huge opportunity for the ETS to include plans for increased hedgerow planting and restoration.

CPRE urges Defra to consider the inclusion of hedgerows in a future Tree Strategy and we would be happy to work alongside Defra colleagues to help achieve this. The design of the proposed Nature for Climate Fund and Nature Recovery Network Fund, along with the Environmental Land Management Scheme, should include measures to deliver more hedgerows across the nation.

### **Landscape character**

We welcome references in the Tree Strategy to the importance of planting the right trees in the right places, along with recognition of the importance of trees in the landscape. We agree that there needs to be a landscape scale approach to the creation of new woodlands and the management of existing woodlands. CPRE believes that landscape character - what makes an area unique - should be an integral part of a Tree Strategy yet this is currently omitted in the consultation. Tree planting and management should enhance a landscape's character and we suggest that landscape information such as Natural England's National Character Area Profiles<sup>16</sup> and Landscape Character Assessments<sup>17</sup> below those (where they are available for an area) should be used in the suite of information to help identify the right place for the right tree. Landscape and Visual Impact Assessments could also be undertaken at the local level to ensure that any tree planting enhances the landscape and compliments amenity values such as viewpoints.

CPRE hopes that Defra will find our comments on the ETS consultation helpful. We look forward to working with you to develop the final Tree Strategy.

Yours sincerely,



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<sup>14</sup> <https://www.cpre.org.uk/resources/greener-better-faster/> (July, 2020)

<sup>15</sup> <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> pg 242, (May, 2019)

<sup>16</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

<sup>17</sup> An example of Landscape Character Assessment in South Hams: <https://www.southhams.gov.uk/article/4940/Landscape-Character-Assessment> (2018)