

Response to consultation on an England Tree Strategy August 2020

Introduction

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. Our response has been endorsed by all nine National Park Societies in England.
2. We are pleased to be able to help inform the new England Tree Strategy but we hope that this will not be the last opportunity for stakeholders to contribute to its development. Given the importance of this policy area for nature, climate and public health we believe that it is essential that stakeholders are given an opportunity to comment on a more complete draft of the Strategy before it is finalised. It is also essential that the objectives of the Tree Strategy are integrated with other relevant Government initiatives such as the forthcoming Peatland Strategy and the new Environmental Land Management Scheme (ELMs) as part of a wider analysis of how land use needs to change in order to address the climate and ecological emergencies. Objectives in other areas such as public access must also be fully integrated with these other initiatives.
3. Our response focuses primarily on Q16 and on highlighting issues which are particularly significant for National Parks but we have also included a number of other more general points which did not fit easily into responses to individual questions.

Response to Q16. What role could the nation’s National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover?

4. National Parks are our finest landscapes with the highest level of protection. Their statutory purposes as set out in the Environment Act 1995 are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. Woodland and trees are a key part of a multi-functional landscape and have multiple benefits in terms of improving connectivity for wildlife, reducing flood risk, sequestering carbon and providing recreational opportunities and as such they make a vital contribution to achieving National Park purposes. We therefore welcome the Government’s ambitions to expand woodland coverage and believe that there are significant opportunities for more trees and woodland in the National Parks. However, this must be delivered in a way which takes full consideration of the need for ‘the right tree in the right place’ and the fact that there are certain locations in National Parks where trees are not appropriate and would undermine their special qualities.

5. There are already well-established mechanisms for agreeing priorities for land management in National Parks, including the encouragement of active woodland management and creation on private land. National Park Authorities (NPA) are experienced at developing and leading partnerships of land-owners and managers in their area to agree and implement Management Plans which set out shared objectives, including ones on woodland creation and management. For example, the [Yorkshire Dales National Park Management Plan 2019-2024](#) contains objectives to “work with farmers and landowners to ensure that at least 70% of all woodland is in active management by 2023, including positive management of conifer plantations to increase suitable habitat for red squirrels and black grouse” (D1) and “support landowners to create at least a further 450 hectares of native broadleaved and mixed woodland that enhances the National Park’s landscape by 2024, with priority given to projects that strengthen habitat networks, increase carbon storage and help to reduce flooding” (D2).
6. In our 2018 report, [Raising the bar: improving nature in our National Parks](#), we recommended that NPAs should adopt a spatial approach to the development of their Management Plan as this would make it easier to understand how different parts of the Park might need to change. Such an approach would be helpful for identifying where tree-planting and other activities should take place and would help ensure that the most appropriate type of habitat is being supported in any particular location. A similar approach should also be adopted across the country and should be informed by accurate and up-to-date mapping of existing habitats including details of the original habitats where inappropriate planting has taken place in the past to ensure that these areas can be appropriately restored in future. This information should then be used to inform Local Nature Recovery Strategies and other related activities. Such an approach will also ensure that woodland expansion can be targeted to areas where it will deliver multiple benefits.
7. The strategy must allow local circumstances to be taken into account, and this is particularly important in the context of National Parks where a range of other factors must be considered when determining the priorities for land management, such as landscape change and impacts on public access. The scope for woodland creation is more limited in some National Parks, such as the Broads, but in such cases there are often areas outside the boundaries where increased woodland cover would be desirable in landscape terms as well as delivering benefits for the climate and nature. The Strategy should recognise the opportunities for planting outside National Parks in order to help avoid undue pressure for planting on important habitats and landscapes within them. NPAs should be supported and enabled to work with other local partners to help achieve this. Such planting could also potentially be used to help enhance the links between National Parks and urban areas nearby by creating green corridors to support both ecological connectivity and access by local people.
8. Any plans for increasing woodland cover in or close to designated landscapes must take full account of the landscape character and cultural heritage of these areas. There should be a requirement to undertake landscape and visual impact assessments and archaeological assessments as part of such

plans. The strategy must also ensure that other important habitats such as peatland and open grassland are protected and enhanced as tree planting in inappropriate locations could actually have a negative impact on biodiversity and carbon sequestration if it replaces such habitats, particularly where they are currently in good condition. For new woodland to deliver maximum benefits it must be designed and managed correctly as well as located correctly. The majority of woodland creation should consist of locally appropriate native¹ species and should be designed to include open glades and rides in order to support increased biodiversity. Grant funding should be designed to encourage this.

9. Grant requirements and funding should also cover the removal of any temporary fencing erected on commons and other Open Access Land (OAL) in order to protect young trees from grazing animals. This is a particular concern in the Lake District but also affects some other National Parks, including the Peak District and Dartmoor. As well as reducing public access and the opportunities for communal grazing, the cumulative effect of this fencing is to erode the sense of openness and it thus has a detrimental impact on landscape character and the National Park's special qualities. Grant agreements should require that all temporary fencing on OAL is mapped with details of the expiry date for the fencing approval and the body responsible for removal. This will ensure that there is a mechanism for following up arrangements for removal in future and avoid temporary fencing becoming permanent fixtures or deteriorating to such an extent that it becomes a trip hazard for walkers.

General comments

10. There should be more emphasis in the strategy on the role of natural regeneration and the appropriate management of existing woodland. Trees outside woodlands also provide an important role including by providing shelter and shade, something which will be increasingly important as the climate changes. The strategy should therefore provide more support for hedgerows, wood pasture, agroforestry and other opportunities for delivering trees outside woodlands. Any commercial forestry should be designed with a good range of species to limit pest and disease impacts and the emphasis should be on growing timber that can be used in construction and other long-term uses in order to maximise the carbon sequestration benefits of forestry. There should be appropriate funding support (both public and private) for all of these activities.
11. The strategy should include an appropriate set of national targets which cover both the quantity and quality of woodland and trees to be delivered and do not focus purely on number of hectares planted. So, for example, these should address issues such as natural regeneration, appropriate management, and the number of native trees outside woodlands. These targets will need to be integrated with targets for other types of habitat, for example, those set in the peatland strategy to ensure that the most appropriate habitat is being supported in a particular location. Targets should also be set for the wider

¹ Including species now considered native such as beech and sycamore where appropriate.

social and environmental objectives of the tree strategy such as improved access and health and well-being.

12. It is also essential to ensure that the right skills are available to ensure that these targets can be met. This means for example, that there should be an emphasis on supporting training and employment in areas such as conservation and woodland management and not just in commercial forestry skills.
13. Any new grants for tree planting and scrub habitat creation should include requirements for a long-term commitment to managing the woodland, including the removal and collection of tree protection tubes once they are no longer needed, to avoid these becoming litter. There also need to be requirements for maintaining and enhancing access. Ensuring good public access will be essential to securing support from local communities for any future woodland plans. All such commitments must be monitored and enforced effectively.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk)