Department
for Environment
Food & Rural Affairs

England Tree Strategy

Analysis of consultation responses

May 2021

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Executive summary

The executive summary provides a summary of the responses to the England Tree Strategy (ETS) consultation. Further detail is included in the main body of the report.

Expanding and connecting our trees and woodland

Financial support is widely considered essential to expanding and connecting our trees and woodland. Consultation respondents say that it is important to provide incentives to farmers and land-owners which recognise the value of ecosystem services provided by trees and woodland – and many want to ensure that an action plan for trees, woodland and forestry is well aligned with the new Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery Schemes. This is particularly highlighted in the context of using woodland creation to deliver benefits in terms of water, flood management and nature recovery: respondents say that increasing grant payments and widening the eligibility criteria for grants are the greatest priorities.

The potential role of natural regeneration and rewilding in creating new woodland is a very prominent theme among the open-ended responses and substantive stakeholder responses to the consultation. Many of these responses argue that it is potentially a low-cost way to expand tree coverage, and that it delivers greater environmental benefits than large-scale tree planting.

Respondents to the consultation also highlight that it is important to provide advice, guidance and training on woodland creation for land managers and land owners on woodland creation – arguing that more needs to be done to ensure that these critical stakeholders are well equipped to create high quality woodland and to manage this effectively. Many responses also call for greater education of non-forester audiences (such as investors, as well as the general public) about the benefits of woodland creation.

In terms of the regulatory barriers to the creation of new woodland, introducing a presumption in favour of UK Forestry Standard approved woodland creation projects which contribute to meeting net zero emissions targets and improving collaboration between different branches of government are considered a priority for many respondents. Setting local priorities, and specifically creating local-level tree strategies, are also repeatedly flagged as important steps to creating new woodland in the most effective way.

Many open-ended responses (particularly from members of the public, local authorities themselves, foresters and environmental NGOs) argue that local authorities play an important role in delivering many aspects of new woodland creation and that central government should provide more financial and technical support to local authorities to enable them to deliver key responsibilities in relation to the strategy. Many respondents believe that National Parks and Areas of Outstanding Natural Beauty can play a coordinating and leadership role in local areas, where relevant.

In addition to the perceived importance of providing financial support, responses to the consultation frequently identify the promotion of tree planting in urban areas, facilitating public involvement, promoting agroforestry and supporting tree planting outside large-scale woodlands as crucial to transforming the level of woodland creation.

Protecting and improving our trees and woodlands

Consultation respondents repeatedly say that the maintenance and aftercare of trees and woodland is essential – and argue that an action plan for trees, woodland and forestry should place a strong emphasis on this, as well as on the planting of new trees.

Ancient woodland is considered particularly important in this context – with respondents arguing that stronger legal protections should be introduced to preserve unique wildlife and habitats, as well as for safeguarding public engagement with trees and woodland. Revising the Ancient Woodland Inventory is seen as an urgent priority.

Linked to this, concerns about biodiversity are widespread in responses to the consultation. Many respondents want an action plan for trees, woodland and forestry to align with the principles of biodiversity net gain. Some respondents specifically express concerns about any potential expansion of large-scale timber forestry, arguing that this is unlikely to be very beneficial in terms of biodiversity.

Increasing grant support for a wider range of management activities and the restoration of Planted Ancient Woodland Sites (PAWS) are seen as the key actions that can help overcome financial barriers to woodland management. Additionally, greater information and support regarding the domestic timber industry, as well as requiring more domestic timber through public procurement policies, are also seen as likely to be helpful. Access to woodland management services, training for agricultural workers, greater visibility of sustainable management and education among public, investors and land-owners / managers are seen as important measures to help address non-financial barriers to woodland management.

Planning requirements are a key theme of responses to this pillar of the consultation. In addition to the protection for ancient woodland highlighted above, many want stronger protections for all trees and woodland in relation to new development. Support and collaboration with local authorities, legal protection, changes in planning legislation and monitoring compliance are all considered important. Specifically, many audiences – particularly members of the public and local authorities - want stronger penalties for illegal practices such as tree felling prior to the granting of planning approval.

Biosecurity is another major theme in the open-ended responses to the consultation. Stakeholders say that an action plan for trees, woodland and forestry should prioritise domestic resources over imports, particularly in the context of tree planting. Linked to this, many also argue for supporting domestic nurseries and domestic tree breeding programmes. There is also a widespread belief that more should be done to prevent, restrict or closely monitor imports – with many responses arguing, for example, for more

inspections at the border, longer quarantine periods or more substantial fines for breaking biosecurity rules.

There is a strong desire to reduce the use of plastics in forestry. Respondents say that the use of non-plastic guards and further research into alternative solutions are the most effective measures to deliver this. In addition, implementing stronger control on the disposal and recovery of plastics and providing support to land-owners to manage deer are also seen as important actions.

Deer management is a polarising issue through the consultation responses – with strong, often contrasting views about the merits of approaches including culling, neutering, fencing, the reintroduction of natural predators (particularly lynx) and the use of plastic tree guards. However, there is a broad consensus across all stakeholder audiences that the deer population is a major challenge to protecting and improving our trees and woodland. Most agree that long-term sustainable solutions are required to ensure that an action plan for trees, woodland and forestry is successful in its aims.

Engaging people with trees and woodland

Maintaining or improving public access to green spaces is widely considered essential. Many individuals and stakeholder organisations highlight the valuable role of green spaces during the COVID-19 pandemic, specifically in relation to the public's physical and mental health. Creating new accessible woodlands in and around towns and cities is often considered an effective way to address barriers to access to trees and woodlands. Stakeholders want to ensure that public access is well thought through in the context of new tree planting activities – ensuring that rights of way are preserved, and that public access is not diminished.

Community engagement is seen as crucial to the success of an action plan for trees, woodland and forestry, both to educate the public about the benefits of trees and woodland and to make the most of volunteer enthusiasm for planting and maintaining trees. Measures to boost community participation in both the management of and decision-making around local woodland are seen as priorities. Community forests are considered an excellent way of educating the public and engaging a diverse cross-section of local communities on key issues.

Consultation respondents believe that an action plan for trees, woodland and forestry should use national policy to increase the number and coverage of trees in and around urban areas. Specifically, some responses repeatedly say that it is beneficial to set local targets and introduce new rules which mandate tree planting in new developments. The development and implementation of local strategies is generally considered essential in this regard. Recognising trees and woodlands as key components of green infrastructure and setting local targets for tree canopy cover are the actions most widely considered likely to be effective in helping the preparation and implementation of local tree and woodland strategies.

Practical challenges, appropriate standards and guidance, and funding and skills (both for delivering new trees as well as maintenance) are all considered key barriers to securing and maintaining street trees. Close collaboration with local authorities is considered important for overcoming these barriers – as is introducing new rules for developers.

Supporting the economy

Promoting the woodland sector is seen as an essential aspect of an action plan for trees, woodland and forestry. Many think that there are urgent workforce shortages across the sector which have the potential to jeopardise the aims of an action plan. Stakeholders want the government to do more to promote woodland-related careers.

A key theme of responses to this pillar is the perceived importance of promoting agroforestry. There is consensus that providing incentives for a wider range of tree planting on farms would be the most effective step to increase tree planting on farms. Providing better advice and guidance on how woodland creation / management can contribute to farm business models is also widely supported.

However, views on the best ways of supporting tree establishment for agroforestry or energy crops are mixed, with no clear agreement among respondents to the consultation. On balance, there is a preference for adjusting policy so that energy forestry crops are not a permanent change of land use. There is widespread agreement that providing industry-led guidance on how tenants and landlords can collaborate for mutual benefit would be an effective step to increasing agroforestry on tenanted farmland.

Energy forestry polarises opinion. Proponents want clarity on the regulatory position for energy forestry, as well as better advice to those who are engaged in it and support to develop a secure supply chain. Providing financial support for the capital costs of energy forestry is most frequently considered likely to increase the uptake of energy forestry. Opponents, particularly environmental NGOs, argue that promoting energy forestry is at odds with other aims of an action plan, as well as the government's goals on climate change.

To encourage the use of timber in construction, there is widespread support for changing planning requirements, amending public procurement standards and boosting skills.

There is no clear consensus on the best ways to strengthen productivity in forestry supply chains. Developing options for private investment for ecosystem services that drive woodland management, widening grant support, training and facilitating collaborative working between woodland owners are all considered priorities.

Additional themes

There is a strong desire among consultation respondents for the government to set targets in relation to the ETS, and to ensure that the ETS aligns effectively with other key policies,

particularly the new Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery Schemes.

You said, we did

We have used the responses to the consultation alongside feedback from workshops and roundtables to inform the development of a new action plan for trees, woodland and forestry for England. The below table illustrates where your responses have directly led to new policy.

You Said…	We Did…
Expanding and connecting our trees and woodland	
There should **be increased grant payments** and **widened eligibility** for types of woodland being created and for types of applicant applying. **Natural regeneration** and **rewilding** should be included in this offer.	We will **review the base payment rates** and provide grant offers covering traditional woodland creation, natural colonisation, riparian woodland and agroforestry. We are also **extending eligibility of our grants** to public bodies and community groups.
There should **be reduced regulatory barriers** to creating new woodland and **better provision of advice, guidance and training** on woodland creation for land managers, land-owners and non-foresters.	We will **review the regulatory requirements for woodland creation** to streamline the process while retaining environmental protections and will be providing **updated guidance** for establishing and managing trees and woodlands.
Community engagement and participation is crucial in developing locally tailored solutions. This includes educating the public about the benefits of trees and woodland and making the most of volunteer enthusiasm for planting and maintaining trees.	We will set up **new Woodland Creation Partnerships** (WCP) and Community Forests to support local ambition, capacity and expertise and make **community groups eligible to apply for new grants**.
Tree planting should be promoted in urban areas and there should be support for **trees outside of woodland**.	We have extended **the Urban Tree Challenge Fund** and launched the **Local Authority Treescapes Fund** to support more trees outside of woodland. We will **publish guidance for local authorities** to

	support them in developing their own local tree and woodland strategies.
Protecting and improving our trees and woodlands	
Stronger protections are needed for ancient woodland and there is a need to **bring all woods into management** to enhance their future resilience to climate change.	We will introduce a **new category of 'Long Established Woodland'**, **update the ancient woodland inventory and review the 2005 Keepers of Time policy** on the management and protection of ancient woodland. We will also be developing a **Woodland Resilience Implementation Plan** to improve the ecological condition of all woodlands.
There should be **more support for domestic nurseries**. More should be done to reduce disease risk including to prevent, restrict or closely monitor imports.	We will **provide support for nurseries and seed suppliers** to enhance security of seed and plant supply. The launch of the Centre for Forest Protection will help enhance the protection and resilience of our trees, woodlands and forests to the threats from pests and pathogens. We will **also support the Plant Healthy Certification Scheme** and publish a new GB plant biosecurity strategy.
The **deer population is a major challenge** to protecting and improving our trees and woodland and long-term sustainable solutions are required, along with **calls to help control squirrels**.	We will develop a **national deer management strategy**. We will also help **update the Grey Squirrel Action Plan** and work with the UK Squirrel Accord to help recover red squirrel populations in England.
There should be **stronger protections for all trees and woodland in relation to new development**, including stronger penalties for illegal practices such as tree felling prior to the granting of planning approval.	We will continue **to reform the felling licence system** for improved clarity around felling controls and UKFS requirements, and stronger enforcement capability.
Engaging people with trees and woodland	
Government should **maintain and improve public access to green**	We will publish **a Woodland Access Implementation Plan** to consider how the quantity, quality and permanency of public

spaces specifically in relation to the public's physical and mental health.	access can be improved in new and existing woodlands.
Supporting the economy	
Government should do more to **promote woodland-related careers** and upskill the sector to reduce the risk of workforce shortages.	We will support the Forestry Skills Forum to create a new **Forestry Skills Action Plan for England**. We will also **develop new technical, higher and professional education routes into the forestry sector** and allied sectors such as arboriculture, agriculture and horticulture**.**
There should **be industry-led guidance on how tenants and landlords can collaborate to increase agroforestry on tenanted farmland.**	We will work with **agricultural tenancy stakeholders** to support woodland creation on tenanted land.
Government should **increase the use of timber in construction**, changing planning requirements, amending public procurement standards and boosting skills.	We will provide **support to develop innovative timber products** through the Forestry Innovation Fund, **encourage more timber use in construction** and public procurement of timber and wood products.
Government should outline options for **private investment for ecosystem services** that drive woodland management, widening grant support, training and facilitating collaborative working between woodland owners.	We will investigate **natural capital concepts, supporting payments for ecosystem services** and attracting more green finance for trees through the Impact Fund to leverage private finance into new natural capital markets.

Introduction and context

The purpose of the consultation was to help inform the development of a new action plan for trees, woodland and forestry in England which will set out forestry policy through to 2050 and beyond.

The consultation launched on 19 June 2020 and ran for 12 weeks. The consultation was supported by a consultation document and technical annex which focussed on four main themes – expanding and connecting our trees and woodlands, protecting and enhancing our trees and woodlands, engaging people with trees and woodland, and supporting the economy. The consultation invited responses to 45 questions across these four themes.

In addition to the responses that were received through the formal consultation, there were also a large number of substantive written responses from stakeholder groups and individuals, and three letter writing campaigns.

To support the consultation process, a series of targeted workshops were held to engage stakeholders on specific topics which required more detailed discussion. The themes of these workshops included:

- Funding trees and woodlands
- Encouraging community engagement
- Trees on farms
- Trees and treescapes
- Vacant and derelict land
- Woodland creation partnerships
- Helping land-owners plant

Ongoing engagement with stakeholders has taken place since the consultation closed to help inform the development on an action plan for trees, woodland and forestry. This includes stakeholder webinars, Ministerial Roundtables and one to one discussions with stakeholder groups. The England Trees Action Plan has now been published.

Respondents

The consultation received 20,740 responses in total. This included 1,625 responses to the consultation questionnaire on Citizen Space, 190 individual email responses, 149 substantive stakeholder responses and 18,776 responses from three letter writing campaigns. The following sections provide further details on the breakdown of responses and respondents.

Responses to the consultation questionnaire

Stakeholders and members of the public were invited to respond to 45 questions posed in the consultation document – these included a mixture of closed (quantitative) and open-ended (qualitative) questions.

A total of 1,625 responses to the consultation questionnaire were received, either directly via the online portal (Citizen Space) or separately via email / paper.

Channel	Responses received
Citizen Space	1,583
Email / paper	42
Total	**1,625**

Figure 1: breakdown of responses to the consultation questionnaire by channel.

In the questionnaire, respondents were asked to self-identify the category of respondent which they felt best represented them. We have used these respondent types throughout this report, including in the attribution of quotations – it is important to flag that respondents have self-identified as belonging to each of these categories, and that no verification has been conducted.

Respondent type	Number of respondents	Proportion of overall quantitative sample
Member of the public	733	45%
Land owner	145	9%
Land manager	46	3%
Farmer	34	2%
Forester	90	6%

Association	34	2%
Professional body	11	1%
Researcher or scientist	48	3%
Local authority	93	6%
Environmental non-government organisation	120	7%
Membership organisation	3	<0.5%
Other	233	14%
Not answered	35	2%

Figure 2: breakdown of responses to the questionnaire by respondent type. *Base: all responses to survey (n=1625 (Q4)). Source: ETS Consultation, June – September 2020*

Responses to the 39 quantitative questions have been analysed statistically. We have highlighted where the views of respondent categories were significantly different, and where the sample size is above 50 – in practice, this means that we have only reported on audience differences involving members of the public, land owners, foresters, local authorities and environmental NGOs. We have not reported quantitative findings for the "other" audience given its diverse nature.

Responses to the 6 open-ended questions (and "other" responses at the quantitative questions) were coded using a codeframe designed to identify the key themes across all the responses. We have reported these quantitatively where appropriate, and included specific verbatim comments from individual responses where these reflect views present across the dataset. All verbatim comments have been anonymised where appropriate.

Additional responses to the consultation

In addition, many organisations and individuals provided separate responses to the consultation via email and letter.

Response type	Number of responses
Individual	190
Stakeholder	149

Figure 3: breakdown of additional responses received, by response type.

The **individual** responses above typically took the form of short emails from members of the public. Most were free-form written submissions, typically under c.2 pages in length.

The **substantive stakeholder** responses typically took the form of longer written documents submitted on behalf of organisations. Most were free-form written submissions, typically between 3 and 30 pages in length.

Both sets of responses have been analysed using codeframes designed to identify the key themes across all responses. We have reported these themes using indicative quantitative assessments (recognising the interpretative nature of this coding, particularly across such a large and complex dataset). We have included verbatim comments from these responses where they reflect common views from the responses. We have anonymised all verbatim comments.

Letter writing campaigns

The consultation also received responses as part of three prominent letter writing campaigns from NGOs and charities who encouraged their members / supporters to respond using a template or suggested wording. Further details on each of the campaigns are provided below. Each have been analysed separately from the remainder of the consultation responses (see section 6).

1. Friends of the Earth

The consultation received 16,590 emails linked to the Friends of the Earth campaign. The campaign was promoted via this web page: https://campaigning.friendsoftheearth.uk/trees/england-tree-strategy-what-you-can-do

2. Woodland Trust

The consultation received 1,962 emails linked to the Woodland Trust campaign. This web page highlights the goals of the campaign: https://www.woodlandtrust.org.uk/protecting-trees-and-woods/campaign-with-us/england-tree-strategy/

3. Rewilding Britain

The consultation received 224 responses from the Rewilding Britain campaign. This web page provides information about the campaign: https://www.rewildingbritain.org.uk/blog/tree-strategy

1. Expanding and connecting our trees and woodland

In this section, we have outlined the responses to the first pillar of the consultation: expanding and connecting our trees and woodland.

Summary of key themes

Financial support

Financial support is considered essential to expand and connect trees and woodland. There is no standout preference for delivering this, although recognising the value of ecosystem services provided by trees and woodland is a common theme. Many key stakeholder organisations want to ensure that an action plan for trees, woodland and forestry is well aligned with the new Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery Schemes. This is particularly highlighted in the context of using woodland creation to deliver benefits in terms of water, flood management and nature recovery: respondents say that increasing grant payments and widening eligibility criteria for grants are the greatest priorities for encouraging this.

Offering tax incentives for private sector support is also seen as valuable for promoting woodland creation, among other areas.

Rewilding and natural regeneration

A major topic across the questionnaire and substantive stakeholder responses is a desire to see greater emphasis on rewilding and natural regeneration approaches to increasing the number of trees and woodlands. Proponents perceive it to be both the most environmentally responsible approach and low cost.

Providing guidance to land managers

To address the non-financial barriers to expanding tree coverage, providing advice and guidance to land managers is widely considered as a major priority.

Above all, respondents argue that there is a need to educate land-owners and land managers about the benefits of woodland creation, as well as about techniques and mechanisms to enable them to create new woodland effectively and to a high standard. They say that this can be done through the provision of easy-to-use information and resources, as well as access to expert advice.

Localism

Developing locally tailored solutions is repeatedly emphasised in consultation responses. Setting local targets, and specifically creating local-level tree strategies (with significant community input into these), is also frequently seen as an important step. A consistent theme among these responses is planting “the right tree in the right place”. This includes:

- carefully considering where should be priority areas for woodland growth
- integrating woodland expansion into local landscapes (including promoting trees outside of woodland)
- making the most of the benefits that tree planting offers (e.g. flood risk management)
- selecting species (preferably native broadleaf species) based on this analysis.

Open-ended responses and substantive stakeholder responses also highlight the important role that local authorities are likely to play in delivering many aspects of new woodland creation. Members of the public, local authorities themselves, foresters and environmental non-governmental organisations (NGOs) argue that central government should provide more financial and technical support to local authorities to enable them to deliver key responsibilities in relation to the strategy.

Many believe that National Parks and Areas of Outstanding Natural Beauty (AONBs) could play a coordinating role in their local areas.

Addressing the financial barriers to the creation of new woodland

Q6: Which actions would address the financial barriers that prevent the creation of new woodland? *Total number of responses to question: 1520*

Q7: Which actions would be most effective in addressing the financial barriers that prevent the creation of new woodland? *Total number of responses to question: 1431*

There is no clear favourite in terms of addressing the financial barriers to the creation of new woodland – respondents say that most of the actions tested would be effective. When pushed, “increasing the payment rates for incentives for woodland creation” and “widening the eligibility criteria for applicants to woodland creation grants so that more applicants can apply” are the two suggestions most likely to be selected as the highest priorities – around two in five select each of these within their top 3 choices.

Other widely endorsed means to address financial barriers include “introducing mechanisms to realise a secure long-term cash flow for ecosystem services” and “widening the eligibility criteria for the types of woodlands and tree planting that can be funded” – around a third select each of these within their top 3 most effective actions.

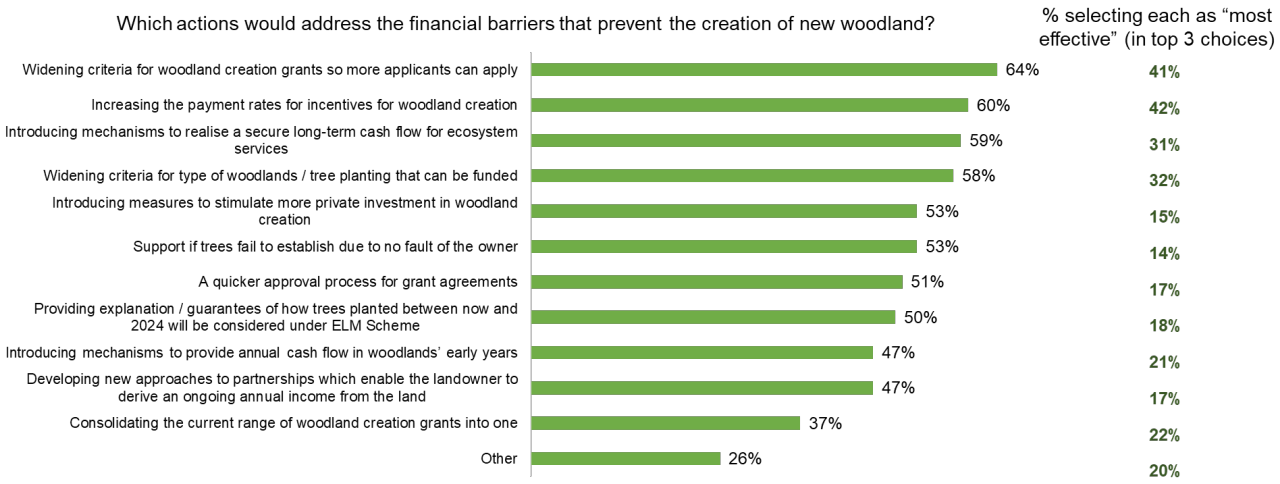

Figure 4: actions to address the financial barriers that prevent the creation of new woodland (Q6 / Q7). *Base: all responses to survey (n=1520 (Q6), n=1431 (Q7)). Source: ETS Consultation, June – September 2020*

Foresters are more likely to select "increasing the payment rate for incentives for woodland creation" and "introducing mechanisms that provide an annual cash flow in the woodlands' early years" within their top 3 most effective actions but are less likely than other respondents to think widening the eligibility criteria for applicants is important. Environmental NGOs are more likely than other respondents to endorse "introducing mechanisms to release the long term cash flow for ecosystem services" as a priority.

Around a quarter of all respondents (26%) wrote in an "other" action they believed would address the financial barriers to woodland creation. The three most prevalent themes are:

- the provision of financial support for the maintenance or aftercare (10%)
- the promotion of natural regeneration or rewilding approaches (e.g. recognise as a form of woodland creation, manage or limit grazing and moorland burning) (10%)
- facilitate public and community involvement in tree planting (e.g. promoting volunteering, contribute to funding, provide guidance, incentives, support communities to buy land for new woodland) (7%)

> *"Specific schemes to encourage small landowners to plant/naturally establish trees, including small charities and community organisations. All funding mechanisms must look long-term and include funding for maintenance and management."* **Other stakeholder**

> *"We should be encouraging natural regeneration and sympathetic site management - better biodiversity results at lower cost."* **Environmental NGO**

Around two in five substantive stakeholder responses and a quarter of individual email responses to the consultation say that financial support – whether through grants, incentives, tax relief or other mechanisms – is essential to expanding and connecting our trees and woodland. A key theme of these responses is that the incentive rates for tree planting need to be more competitive relative to other land uses.

"Research […] suggests that payment rates for tree planting need to be more competitive against other land uses if woodland creation is to be accelerated at the proposed rate." **Other stakeholder**

Encouragement of private investment in woodland creation

Q8: 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? *Total number of responses to question: 1217*

In their free-form responses to an open-ended question about how government could better encourage private investment in establishing trees and woodland creation, the primary theme mentioned by around three in ten respondents is to provide financial support, rewards or grants to promote and incentivise private investment.

Encouraging private sector investment in woodland creation is also a common theme of both substantive stakeholder responses and individual email responses. Around one in six such responses highlight this theme.

1. Provide financial support, rewards or grants

Within the theme of providing financial support to encourage private investment there is no standout priority. Instead, a range of approaches and mechanisms are suggested:

- Ensuring that there is a mixed approach with both public and private finance being used, for some this could be in the form of one to one grant matched funding to ensure public funding is matched with private investment.

"Government needs to get this process started with public funding to match private investment." **Member of the public**

- Ensuring that any funding and financial support means that the creation and maintenance of woodlands is financially viable for farmers and land owners in comparison to other types of land use, including the selling of land for development. Respondents also raise the issue that such support needs to ensure it considers the long term costs of woodland maintenance.

"For farmers to survive they need an income so woodland needs to provide an annual return. It costs money to plant trees and look after them." **Land owner**

- The introduction of Government-backed bonds or an investment tool that provides potential investors with some form of guaranteed return on capital investment.

"Create new financial mechanisms such as eco bonds where long-term investors such as pension funds can invest with a guaranteed annual return over a long investment

period. Or a sovereign fund that invests in restoration and development of the land with expectations of medium to long term returns." **Other stakeholder**

- Offer tax incentives or make investment in woodland creation and maintenance schemes tax deductible for individuals and particularly companies.

"By subsidising woodland creation by private investment and offering tax incentives for doing so." **Member of the public**

- Develop mechanisms that provide opportunities for either individual private investors or small community groups to come together to "buy a few trees" and provide funding for the creation of small scale woodlands.

"The UK has many pockets of micro woodland and there are no incentives to retain these as they fall below the size threshold for any funding, yet together make up much of the UK's wooded areas." **Member of the public**

2. Secondary mechanisms for encouraging private investment

Numerous secondary suggestions emerge from the open-ended responses for how to encourage private investment. The following themes were raised by between one in seven and one in ten respondents.

- **Educate investors, businesses and stakeholders** on the full range of benefits of woodland creation and sustainable forest management, including financial, environmental and health and well-being benefits.
- Encourage **companies to sponsor and support woodland creation**. Suggestions include a variety of mechanisms, such as: offering 'kite marks' for tree planting; allowing companies to offset tree planting or donations for tree planting against tax; requiring companies to report on their tree-planting activities within annual reports and corporate social responsibility (CSR) activities; and supporting staff volunteering opportunities.
- **Change taxation for land-owners** to make woodland creation more attractive – suggestions include both providing tax relief for those planting trees or increasing taxation if land holdings do not include woodland.
- Introduce **new rules for developers**, for instance rules for large development sites that include a requirement for tree planting and only releasing land for development on the condition developers agree to tree planting or maintenance activities.
- Promote **natural regeneration and rewilding** including through financial support, grants and incentives.
- Introduce **payment mechanisms for ecosystem services** e.g. through payments to land-owners whose woodlands provides such services or by creating a system of marketable ecosystem credits.

In the open-ended responses local authorities are particularly supportive of encouraging companies to sponsor and support woodland creation (as are environmental NGOs) and

also introducing new rules for developers. Foresters are particularly supportive of the introduction of payment mechanisms for ecosystem services.

Addressing the non-financial barriers to the creation of new woodland

Q9: Which actions would address the non-financial barriers to the creation of new woodland? *Total number of responses to question: 1481*

Q10: Which actions would be most effective in addressing the non-financial barriers to the creation of new woodland? *Total number of responses to question: 1415*

Many of the solutions proposed for addressing the non-financial barriers to the creation of new woodland are considered likely to be effective by respondents. There is no single clear favourite among the solutions tested. The provision of advice and guidance emerges as an important theme: around two thirds of respondents endorse "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)" and also "providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills."

Other widely supported actions include 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 (64%) and educating and enthusing a new generation to expand the forestry industry (62%).

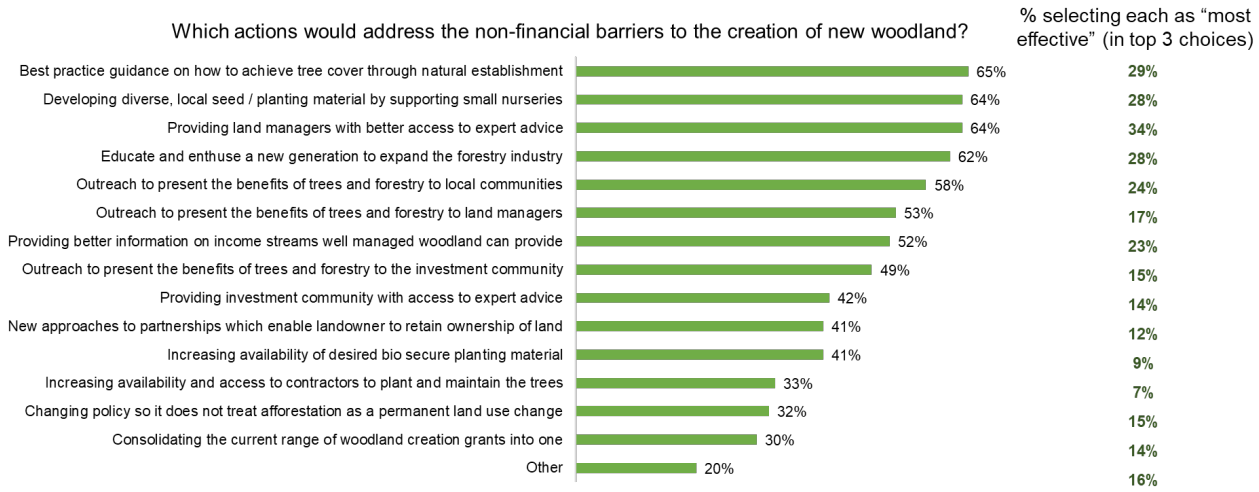

Figure 5: actions to address the non-financial barriers to the creation of new woodland (Q9 / Q10). *Base: all responses to survey (n=1481 (Q9), n=1415 (Q10)). Source: ETS Consultation, June – September 2020*

Environmental NGOs are more likely than other audiences to endorse many of suggested activities – particularly: outreach activities to present the benefits of trees and forestry to land managers (69%); and outreach to present the benefits to local communities (67%).

Local authority stakeholders are more likely than others to support increasing availability of desired bio secure planting material (66%).

Foresters are less likely than local authorities and Environmental NGOs to endorse many of the suggested actions. This is particularly the case for providing best practice guidance on natural establishment (endorsed by 31%) and developing locally sourced seed and planting materials (endorsed by 45%). Foresters are most likely to support providing land managers with better access to expert advice (59% select this) and educating and enthusing a new generation to expand the forestry industry (57%).

One in five respondents provided an additional suggestion for an action they felt would effectively address the non-financial barriers to woodland creation. The most common themes within these suggestions are highlighted below (N.B. the issues of education and rewilding are often explicitly linked by respondents):

- Educate land owners, managers and stakeholders (to drive land use change, as well as on planting, seeding methods and woodland management) (6%)
- Promote natural regeneration and rewilding and recognise this as a form of woodland creation (6%)
- Facilitate public and community involvement (e.g. register of woodland skilled volunteers, collaboration between volunteers and land owners, local community involvement in planting, awards for tree planting / woodland creation) (6%)
- Educate the public (5%)

Educating key stakeholders is also a prominent theme among substantive responses to the consultation. Around a fifth of the substantive stakeholder responses refer to this – and a similar proportion refer specifically to the perceived need to advise land owners, land managers and farmers on land management.

The substantive stakeholder responses refer to the perceived need to educate land owners and land managers about the benefits of woodland creation, as well as about techniques and mechanisms to enable them to create new woodland effectively and to a high standard. Respondents argue that this can be done through the provision of easy-to-use information and resources, as well as access to expert advice where necessary.

> *"Catchment scale plans and good quality trusted advice for those impacted will be key to help manage a smooth transition from the current stewardship schemes."*
> **Land owner**

Specifically, some substantive stakeholder responses refer to making the most of behavioural science to ensure that new approaches are easy to learn about and implement: *"the importance of understanding cultural and social constraints especially in the farming community must not be overlooked"* (government agency). Education is not just limited to land managers, however – responses emphasise educating and upskilling a wider set of stakeholders, including urban planners and investors.

Addressing the regulatory barriers to the creation of new woodland

Q11: Which actions would address the regulatory barriers that prevent the creation of new woodland? *Total number of responses to question: 1431*

Q12: Which actions would be most effective in addressing the regulatory barriers that prevent the creation of new woodland? *Total number of responses to question: 1365*

The suggested actions for addressing regulatory barriers to new woodland creation for which there is most widespread support are: local partners agreeing and setting of local priorities (69%); collaboration between branches of government on land management (65%); enabling regulatory decisions by the Forestry Commission which reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in the 25 Year Environment Plan (54%); and clarity on inclusion of tree planting under the Environmental Land Management Scheme (54%).

When asked to prioritise the most effective actions to overcome regulatory barriers, enabling regulatory decisions by the Forestry Commission which reflect the net zero emissions obligations and the 25 Year Environment Plan and enabling collaboration are the highest priorities – each selected by around three in five as in their top 3 actions.

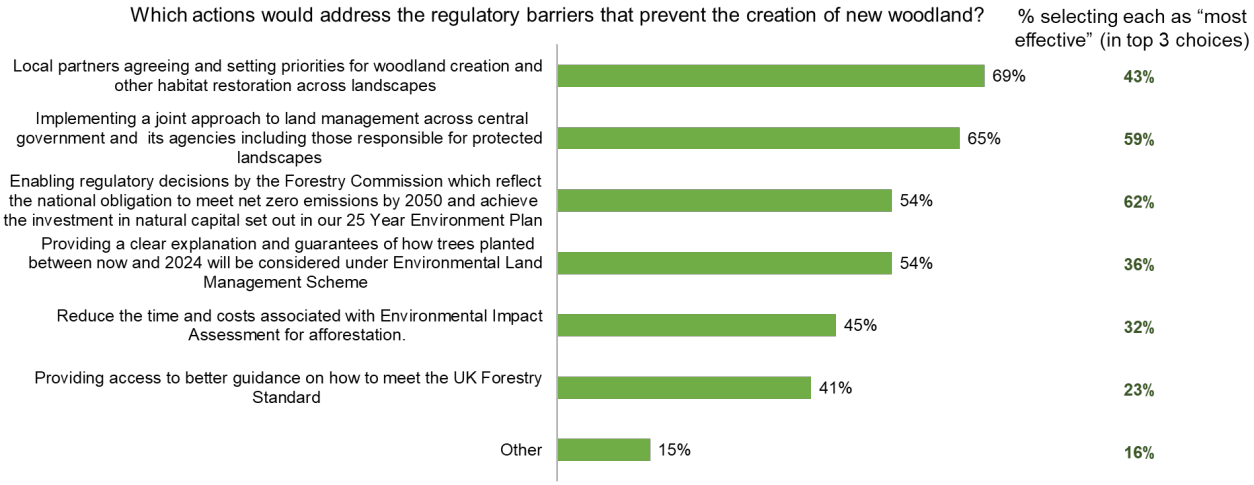

Figure 6: actions to address the regulatory barriers that prevent the creation of new woodland (Q11 / Q12). *Base: all responses to survey (n=1431 (Q11), n=1365 (Q12)). Source: ETS Consultation, June – September 2020*

Foresters are more likely than other respondents to place emphasis on local partnerships to agree and set priorities for woodland creation (65% select in top 3 priorities) and also on reducing the time and costs associated with Environmental Impact Assessment for afforestation (47% select in top 3 priorities).

Local authorities (70%) and environmental NGOs (75%) are more likely than other respondents to put priority on enabling regulatory decisions by the Forestry Commission which reflect the net zero emissions obligations and the 25 Year Environment Plan.

Around one in six respondents provided an additional suggestion for overcoming regulatory barriers. These included the following themes:

- Promotion of natural regeneration and rewilding (4%)
- Change of planning laws or processes (4%)
- Simplify grant application process (e.g. simpler forms, clearer eligibility criteria) (3%)
- Improve communications and collaboration between government agencies (2%)
- Facilitate public and community involvement (e.g. to support the public, community groups to purchase new land for woodland creation). (2%)

The perceived importance of careful thought and planning by local decision-makers is a common theme of both substantive and individual email responses to the consultation. Around two in five substantive stakeholder responses make comments which fall under this overarching theme – as do around one in seven individual email responses.

This broad theme encompasses a number of specific suggestions – including the importance of careful selection of site and species for planting ("the right tree in the right place"), consideration about how these species will respond to climate change factors, identifying priority areas for woodland growth, using spatial data to inform tree planting and embracing landscape-level planting. A common theme of the substantive stakeholder responses is the desire to integrate woodlands into existing local landscapes – i.e. not compromising existing habitats or landscapes. Around three in ten of all substantive stakeholder responses refer to this.

> *"In some landscapes there are significant opportunities for substantial areas of new woodland, in others places rare habitats, historic features or valued character and beauty may suggest more subtle planting."* **Other stakeholder**

Similarly, planting in line with the UK Forestry Standard is another topic that is frequently mentioned in the substantive stakeholder responses (by about one in seven). Managing in line with the UK Forestry Standard is referred to in a similar proportion.

Support the natural establishment of woodland in the landscape

Q13: How can we most effectively support the natural establishment of trees and woodland in the landscape? *Total number of responses to question: 1244*

In their free-form responses to an open-ended question about the most effective ways to support the establishment of woodland in the landscape, consultation respondents refer primarily to two themes – each mentioned by a third of respondents. These are promoting natural regeneration / rewilding, and providing financial support.

1. Promote natural regeneration and rewilding

Many of the comments endorse the principles of natural regeneration without providing further details other than they would like to see rewilding supported and generic comments about the provision of information, advice and financial support to promote rewilding. Some of these respondents refer directly to their support of the Rewilding Britain campaign or the need to learn lessons from the Knepp Estate. Environmental NGOs are more likely than other respondents to endorse the promotion of natural regeneration and rewilding.

Some responses make more specific comments relating to the promotion of natural regeneration and rewilding and financial support – recurring themes include:

- Provide natural capital value payments for land providing good quality habitats (e.g. scrub land which can be perceived to have little value but could have high natural capital value and is part of the succession to woodland)
- Provide clear and smart targets for the proportion of new woodland created through natural regeneration and rewilding approaches
- Ensure areas of natural regeneration are strategically located and connected to existing areas of high-quality native woodland habitat through Local Nature Recovery Strategies
- Ensure woodland-succession habitats (e.g. scrubland and woodland pasture) are recognised as key elements of the natural regeneration process and receive support through woodland creation grants
- Promote rewilding for small parcels of land where appropriate
- Help land managers to handle complaints about “scruffy” unmanaged land
- Ensure ongoing engagement between land managers and communities and user groups to address the potential practical challenges natural regeneration presents for maintaining public access
- Compulsory purchase of land and mass re-wilding.

> *“Identifying priority areas where natural regeneration can achieve the greatest benefits. Natural regeneration plans can be delivered as part of the Nature Recovery Network - creation of priority sites which are afforded a 'hands-off' protection from development in order to allow the site/s to achieve their full potential.”* **Environmental NGO**

Promoting natural regeneration or rewilding is also a very prominent theme in the substantive stakeholder and individual responses. Around half of individual email responses to the consultation and two in five substantive stakeholder responses argue that an action plan for trees, woodland and forestry should do more to promote natural regeneration and rewilding.

> *“Natural regeneration […] should be a priority and fully supported economically for essential enabling costs such as fencing, and payments through ELM for land management supporting the delivery of public goods.”* **Environmental NGO**

Many substantive comments refer to natural regeneration as a low-cost option, arguing that it is “*cheap, resilient, and can be an attractive component of the landscape.”* (Other

stakeholder) The perceived biodiversity benefits are also cited by many. Others argue that natural regeneration reduces the risk of imported disease:

> *"A longer term natural regeneration approach can […] reduce the risk of importing disease and non-natives and maximise ecological benefits in some of the more sensitive protected landscapes if planned for."* **Association**

Specifically, some respondents say the strategy should actively seek to promote expertise on natural regeneration – for example, through funding training and advice.

2. Provide financial support

A third of respondents mention the need for financial support in order to promote the natural establishment of trees and woodland in the landscape. Many of the respondents make generic comments about the need to ensure the overall level of funding is sufficient and access to grants or incentives will be important. More specific comments include:

- Ensure that the financial support available makes supporting woodland financially viable for land owners, particularly in comparison to other land uses and compensation for loss of other potential income
- Ensure that financial support considers the long term management and maintenance costs providing assurances needed for long term commitment
- Provide grants and fund deer protection methods and deer fencing
- Provide grants for ground preparation
- Provide annual payments to leave land 'fallow' – similar to other set aside schemes
- Fund people with expertise to coordinate and work with others
- Provide grants for smaller schemes or smaller parcels of land
- Fund community-based projects e.g. buy land for communities to manage or provide trees for free for communities to plant

> *"Fund those bodies with tree expertise […] to employ and engage a team to work with businesses, landowners and community groups to plan and maintain an increase in tree canopy cover - with the right trees in the right places."* **Other stakeholder**

Other secondary themes raised by respondents in this open-ended question, and mentioned by between one in seven and one in ten include:

- Support **planned tree planting** (planting to a systematic plan - e.g. careful selection of site and species for planting, consideration of climate change factors, identify priority areas for woodland growth)
- **Educate public** (about benefits)
- **Educate land owners / land managers** and stakeholders (communicating benefits, etc.)
- Facilitate **public / community involvement**
- **Prevent/penalise bad practices** (e.g. developers when not implementing woodland in large developments, moorland burning, grouse shoots, grazing, cutting down old trees, deer management)

- **Manage deer population** (where culling is not specifically mentioned). This is a particularly important theme for foresters.

Other actions to transform level of woodland creation & non-woodland trees

Q14: 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? *Total number of responses to question: 939*

When asked about other actions not already mentioned that would help land owners and managers to increase woodland creation, the primary theme mentioned is **providing long-term financial support.** This is cited by around one quarter of respondents.

For some respondents this is about ensuring that there is a commitment from the Government to provide sufficient funding over the long term where the focus is on ensuring grants, funding and schemes recognise and support the need for ongoing maintenance of trees and woodland.

> *"The cost and time of maintenance on young trees and woodlands is high. Incentives like longer term maintenance grants or grants available on machinery to manage these sites would help."* **Forester**

Other secondary activities (mentioned by between one in seven and one in ten) include:

- Promote **tree planting in urban (and peri-urban) areas** / community spaces (e.g. require councils, Highways England and schools to plant more trees)
- Facilitate **public / community involvement** (e.g. in planting and maintaining trees)
- Promote **agroforestry** (e.g. raise awareness of benefits)
- Plant in **hedgerows** (e.g. funding or incentives for planting in / restoring hedgerows, encourage expanding/widening hedgerows, hedge replacement schemes)

Other themes mentioned by fewer than one in ten respondents include:

- Provide advice / support for land owners (education on improving profitability of woodland)
- Introduce new rules for developers (reward incentives for developers and penalties, change planning laws)
- Facilitate greater stakeholder engagement and involvement (e.g. partnerships between land owners and agencies, involvement of other national and local authorities, influential organisations)
- Improve understanding of local ecology (e.g. environmental assessments to protect habitats, identify tree planting opportunities).

Promoting trees outside of woodland – specifically, in hedgerows and orchards – is a major theme of substantive stakeholder responses, with around three in ten referring to this. These responses typically refer to the benefits that trees outside of woodland offer in terms of biodiversity. Wider benefits (such as in terms of the beauty of the landscape) are also mentioned. For example, one government agency says that *"these trees are important for biodiversity, landscape and the provision of green infrastructure and the strategy itself needs to address this gap."* Another (a membership organisation) says that "*the Government to be more positive about the multiple benefits they deliver to farm businesses, society and the environment."*

Numerous substantive stakeholder responses also say that promoting trees outside of woodlands can boost tree canopy cover in a way that is consistent with existing landscapes. For example, one organisation (from the "other stakeholder category") says that specific parts of their local area "*are particularly suited to increasing tree canopy cover through restoration of shelterbelts; natural regeneration of scrub woodland; increasing linear treescapes; doubling width of hedgerows to incorporate more hedgerow trees; and managing and extending tree and scrub growth from clough (moorland valley) woodlands onto peatland edges to stabilise those areas and prevent peat erosion."*

Some substantive stakeholder responses call for targets to promote trees outside of woodland – specifically, as one researcher says, for "*the creation of hedgerows, planting of trees specifically outside woodlands (including in hedges) and appropriate hedgerow management"* – and say that there should be incentives aligned to these.

Expanding woodland creation in key locations

Q15: 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? *Total number of responses to question: 1430*

To expand woodland creation in locations which deliver water, flood risk benefits and nature recovery, increasing grant payments for tree planting in key locations (e.g. along water courses, steep sided slopes) is most widely thought to be effective (62%).

Other areas that are widely considered to be effective are widening the eligibility criteria for woodland creation grants to include more woodland sizes (47%), widening the eligibility criteria so more applicants can apply and more forms of woodland are eligible (44%) and implementing a joint approach to land management (42%).

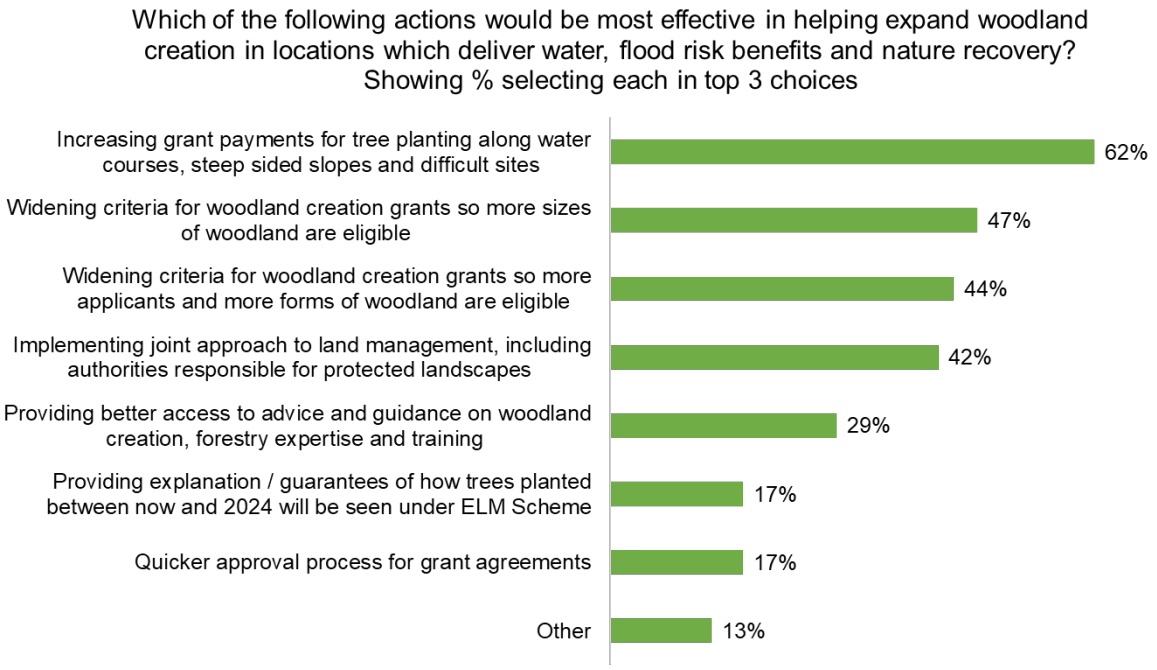

Figure 7: actions to help expand woodland creation in locations which deliver water, flood risk benefits and nature recovery (Q15). *Base: all responses to survey (n=1430 (Q15)). Source: ETS Consultation, June – September 2020*

One in seven respondents provided an additional suggestion for how to expand woodland creation in key locations. The most frequently mentioned activities are:

- Support well planned tree planting (planting to a systematic plan – e.g. large-scale tree planting projects, avoid planting in flood plains, plant along rivers and water courses, tree planting and soil restoration in upland catchment areas to tackle excess water at source, prioritise areas for planting) (8%)
- Promote natural regeneration / rewilding (e.g. recognise as a form of woodland creation, manage / limit grazing and moorland burning, require certain amount of natural regeneration) (6%)
- Support wildlife which naturally manages woodland / wetland (e.g. beavers) (4%)

Local authorities are more likely than other audiences to select widening the eligibility criteria so that more applicants can apply and more forms of woodland are eligible for creation grants (57%).

Land-owners are more likely than average to want a clear explanation and guarantees of how tree planting will be considered under the new Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery Schemes (27%). Whereas foresters are more likely than other respondents to select quicker grant approval processes as one of the top 3 priorities (32%).

A common theme of the substantive stakeholder responses is planting in flood plains or key locations for water resources management. Around one in seven substantive stakeholder responses refer to this topic. Often, and particularly for water companies,

catchment planning is referred to as a way to make the most of the benefits that tree planting offers in terms of water resources and flood risk management.

Role of National Parks and AONBs in increasing woodland cover

Q16: What role could the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover? *Total number of responses to question: 1182*

In their free-form responses to an open-ended question about the role that the National Parks and Areas of Outstanding Natural Beauty (AONBs) could play in increasing woodland cover, around a third of respondents make comments about wanting to see them **take a more active role in the creation and regeneration of woodland**.

Many of these comments, especially by members of the public, acknowledge the potentially important role that National Parks and AONBs could play in increasing woodland cover (particularly due to their geographic coverage) and make generic statements about the need for them to increase the priority given to woodland creation. More specifically respondents suggest that National Parks and AONBs should develop woodland creation targets which are reported on annually – some believe it should be a requirement to report on tree planting progress.

Foresters are more likely than other respondents to think that National Parks and AONBs should take an active role in woodland creation (around half say this, compared to around a third of all respondents) – through planting policies, target setting and reporting.

There is a perception, particularly among foresters, that a change of mindset could be required in order to move from maintaining the status quo (and prioritising the traditional landscape) towards welcoming landscape change. Alongside this is a view that National Parks and AONBs need to become more proactive and have a more positive and committed approach to increasing woodland – indeed it is believed they could become a champion, demonstrating what can be achieved to others and leading by example. For example, one forester argues that National Parks and AONBs could help by "*visibly encouraging tree planting within their areas, and providing supportive stakeholder consultation responses to projects being brought forward."* Some say that woodland expansion should be addressed in the management plans of National Parks and AONBs.

Other prominent themes, raised by around one in five respondents, are:

- **Co-ordinate tree planting in local areas** (e.g. by encouraging councils to plant more trees, encouraging enhancement of natural beauty, acting as source of advice for local stakeholders, share expertise and innovations)
- Set aside areas for **re-wilding and reforestation** (reduce grassland and heathland)

In addition, a range of other activities were mentioned:

- **Educate public** (e.g. educating children and young people, organising open days)
- **Reduce grazing pressure** in uplands (e.g. by incentivising regeneration)
- **Educate land owners / land managers** and stakeholders
- **Limit activities that can damage** new and existing trees (e.g. off road vehicle access, moorland burning, grouse hunting)
- Ensure woodland creation does **not affect natural landscape and beauty.**

2. Protecting and improving our trees and woodlands

In this section, we have outlined the responses to the second pillar of the consultation: protecting and improving our trees and woodlands.

Summary of key themes

Supporting maintenance and aftercare

Many respondents argue that measures to secure the long-term future of all trees – and to safeguard the quality of woodland, both new and old – are at least as important as measures to support woodland creation.

To overcome the financial barriers to woodland management, many want the government to increase grant support for management activities, as well as for the restoration of protected and ancient woodlands. Improved access to woodland management services, training for agricultural workers, greater visibility of sustainable management and education among public, investors and land-owners / managers are seen as important measures to help address non-financial barriers to woodland management. Greater information about, and support for, the domestic timber industry (for example, through public procurement policies) are also likely to be seen as helpful.

Biodiversity

Biodiversity is a major theme of the open-ended consultation responses. Around two in five substantive stakeholder responses refer to protecting or promoting biodiversity through the action plan, as do around one in six individual email responses.

Specifically, some organisations – particularly environmental non-governmental organisations (NGOs) – express concerns about the lower biodiversity benefits of timber forestry. Many responses argue that the Government policy on trees should align with the principle of biodiversity net gain.

Planning requirements

Many want stronger protections for all trees and woodland in relation to new development. This is true for all trees and woodland, but particularly pronounced for ancient woodland – enhanced legal protections for ancient woodland (and revision of the Ancient Woodland Inventory) are one of the major themes of the open-ended and substantive stakeholder responses. Many say that this is essential to preserve unique wildlife and very valuable ecosystems – as well as for wider public engagement with trees and woodland.

Respondents argue that the action plan should prioritise support and collaboration with local authorities on this issue. Wider changes in planning legislation and greater monitoring of compliance are also considered important. Specifically, many respondents – particularly members of the public and local authorities – want more severe penalties to be imposed for illegal practices such as tree felling prior to the granting of planning approval.

Biosecurity

Plant biosecurity is mentioned frequently in the open-ended and substantive responses to the consultation. Many respondents say that an action plan for trees, woodland and forestry should prioritise domestic resources over imports, particularly in the context of tree planting. Linked to this, many also argue for supporting domestic nurseries and domestic tree breeding programmes. Improving the availability of native, diverse and locally-appropriate seeds is seen as key, along with ensuring and promoting compliance with the Plant Health Management Standard.

Many respondents also argue that more should be done to prevent, restrict or closely monitor imports – for example, through more inspections at the border, longer quarantine periods or more substantial fines for breaking biosecurity rules.

Deer management

There is a broad consensus across all stakeholder audiences that the deer population is a major challenge to protecting and improving our trees and woodland. All agree that long-term sustainable solutions are required to ensure that an action plan for trees, woodland and forestry is successful in its aims. Opinions on what to do about deer issues are polarised. Responses include strong, often contrasting views about the merits of approaches including culling, neutering, fencing, the reintroduction of natural predators (particularly lynx, as well as wolves and – to a much lesser extent – bears) and the use of plastic tree guards.

Cross-government collaboration

Cross-government collaboration is a theme identified throughout responses to the whole consultation. For example, around one in seven substantive stakeholder responses refer to improving collaboration and communication between different branches of government, including local authorities - this is particularly prominent in terms of protecting and improving trees and woodlands. Specifically, greater support for local authorities to protect existing woodland – especially ancient woodland – is highlighted as essential.

Increasing protection from unsustainable management

Q17: Which actions would be most effective to increase protection for trees and woodland from unsustainable management? *Total number of responses to question: 1404*

Greater penalties for non-compliance, a clearer policy presumption that trees felled without a licence will be replaced, and more effective information sharing across government are widely considered the most effective ways to increase protection for trees and woodland from unsustainable management.

Around half of all consultation respondents (48%) selected “greater penalties for non-compliance with the requirements of the Forestry Act” in their top three priorities for increasing protection from unsustainable management. Members of the public are particularly supportive of this, with three in five (59%) selecting this as one of their top three priorities. Foresters are also particularly likely to be supportive – around half (52%) selected this as one of their top three priorities.

Around two in five selected each of “a clearer policy presumption that all trees felled without a licence will be replaced” (41%) and “more effective information sharing between government departments and their delivery bodies to inform decisions impacting on woodland, including to prevent woodland loss” (41%). A similar proportion (37%) selected “introducing clearer processes for licencing tree felling, with felling licences that can be suspended, withdrawn or superseded”.

Around a third (32%) selected “refining the process of making Tree Preservation Orders, and clarifying the criteria to improve consistency in application of the policy across local authorities”. Local authorities are particularly supportive of this – around half (46%) selected this as one of their top three priorities, making it the joint most selected priority among local authorities (alongside greater penalties for non-compliance).

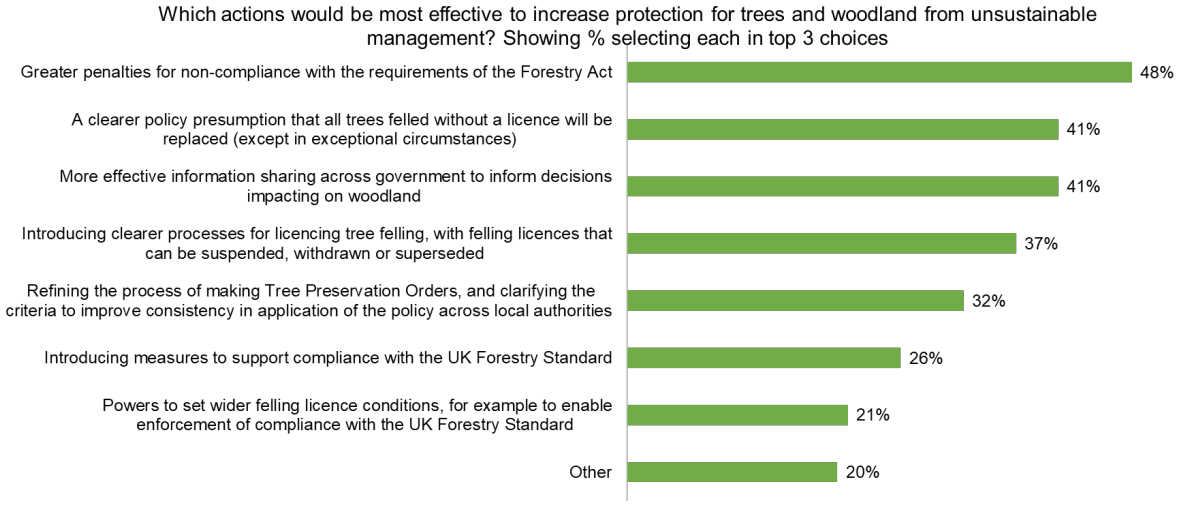

Figure 8: actions to increase protection for trees and woodland from unsustainable management (Q17). *Base: all responses to survey (n=1404 (Q17)). Source: ETS Consultation, June – September 2020*

Around one in five respondents chose “other” as one of their top three priorities at this question. In their open-text responses, preventing or penalising bad practices emerges as a strong theme – open-text responses relating to this theme account for 14% of all

respondents. Specifically, illegal tree felling is often mentioned – with many arguing that the penalties need to be more severe:

> *"Greater penalties for illegal felling and for poor or absent management."* **Member of the public**

> *"Automatic loss of planning permission on illegally cleared sites."* **Forester**

Many also highlight the role of local authorities in felling urban trees and say that this practice needs to be stopped:

> *"Introduce a nation-wide reporting system which would let ordinary members of the public report their Council / Local Authority for the indiscriminate felling of urban trees."* **Member of the public**

Other themes emerging from the open-text responses include:

- Legally protecting / preserving ancient woodland (5% of all responses fall under this theme)
- Legally protecting / preserving non-ancient woodland (5%)
- Providing financial support (5%)
- Introducing new rules for developers (3%)
- Educating land-owners / land managers and stakeholders (2%)
- Simplifying regulation (2%)
- Facilitating public / community involvement (2%)
- Giving greater responsibility to local authorities (2%)

Enabling better protection of ancient woodland in planning

Q18: Which actions would best help the planning system support better protection and enhancement of the ancient and wider woodland environment and trees? *Total number of responses to question: 1418*

Supporting the complete revision of the Ancient Woodland Inventory is, by far, seen as the most effective way to help the planning system support better protection and enhancement of the ancient and wider woodland environment and trees. Better monitoring of planning applications and increased collaboration between government agencies and local planning authorities are also perceived as important.

Around half of consultation respondents (49%) selected "providing support to fully complete revision of the Ancient Woodland Inventory" as one of their top three priorities in response to this question. This figure is consistently high among almost all of the stakeholder types. Around three in ten (28%) selected "providing better monitoring and recording of decisions on planning applications affecting ancient woodland" in their top three choices. Around one five selected each of:

- “more effective information sharing between agencies and local planning authorities to inform decision making impacting on woodland including to prevent woodland loss” (23%)
- “encouraging more woodland to be brought into management where impacted by development” (21%)
- “commissioning research into effective size and use of buffer zones around woodland for different impacts” (20%).

For foresters, “encouraging more woodland to be brought into management where impacted by development” is a particularly important priority – three in ten (31%) selected this as one of their top three priorities. A similar proportion (27%) selected “sharing best practice guidance and training to support implementation of National Planning Policy Framework policy on ancient woodland with local authority planners”.

For local authorities, the top three priorities are slightly different:

- “providing support to fully complete revision of the Ancient Woodland Inventory” is selected by 38% of local authority respondents
- “commissioning research into effective size and use of buffer zones around woodland for different impacts” (31%)
- “other” (31%) – further analysis of these responses is below.

For environmental NGOs, the top three is again different:

- “providing support to fully complete revision of the Ancient Woodland Inventory” is selected by 43% of environmental NGO respondents
- “other” (32%) – further analysis of these responses is below
- “sharing best practice guidance and training to support implementation of National Planning Policy Framework policy on ancient woodland with local authority planners” (31%).

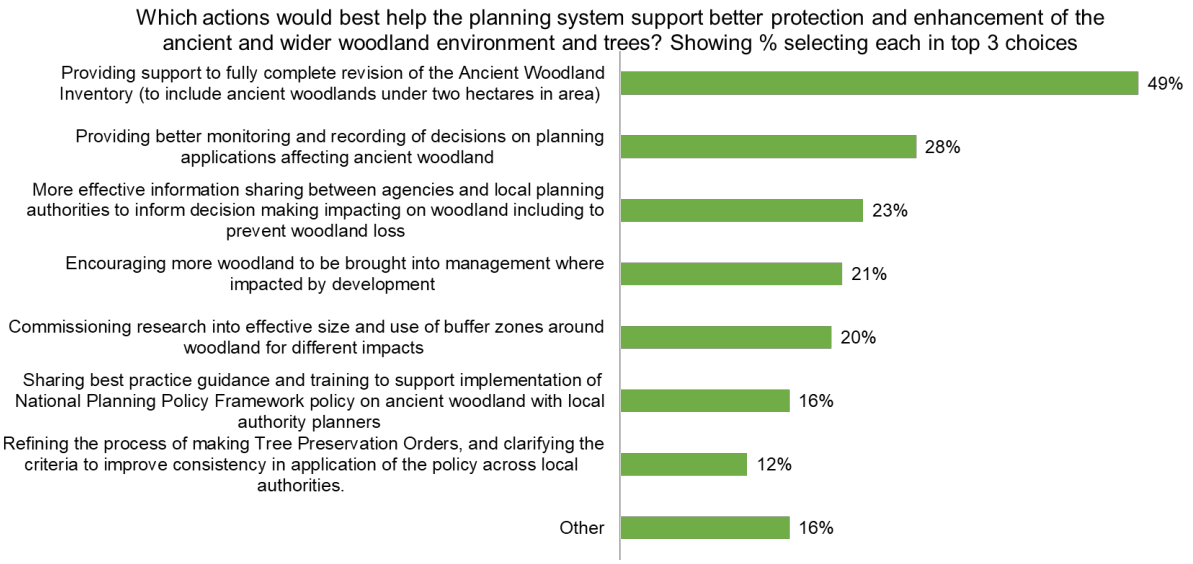

Figure 9: actions to help the planning system support better protection and enhancement of the ancient and wider woodland environment and trees (Q18). *All responses to survey (n=1418 (Q18)). Source: ETS Consultation, June – September 2020*

As highlighted above, the "other" responses are particularly high among local authority and environmental NGO respondents. Among both audiences (and to a lesser extent other audiences), the key theme of these free-text responses is the perceived need for stricter enforcement, regulation and penalties (e.g. in regard to the felling of trees before planning applications are made). Responses related to this theme account for around a third of all local authority (36%) and environmental NGO (30%) responses to this question.

Specifically, respondents frequently argue that ancient and veteran trees should be subject to higher levels of protection in relation to planning applications – with it made harder for developers to remove ancient / veteran trees except where unavoidable:

> *"New planning legislation required in addition to TPOs for more robust protection of existing trees on development sites. Introduce stricter requirement for justification for their removal."* **Local authority**

Some stakeholder organisations argue that buffer zones relating to development around ancient woodland need to be enlarged – with one local authority arguing that there needs to be "*stronger policy support for buffer zones of more than 15m width.*"

These themes are echoed in the substantive stakeholder responses to the consultation, of which around a quarter argue that legal protection of ancient woodland is very important. Legal protection for other forms of woodland is also frequently cited, by around one in eight stakeholder organisations. Legal protection is particularly important for environmental NGOs, including many of Defra's key stakeholder organisations. For example, one environmental NGO says that an action plan for trees, woodland and forestry "*must ensure the protection and good management of existing woodland and trees outside woods, including England's unique population of ancient trees – through legislation, adequate guidance and advice (including officer support), and funding."*

Above all, comments about legally protecting ancient woodland relate to the perceived importance of preserving unique habitats and wildlife, and to their role in terms of biodiversity. More broadly, the need to protect biodiversity is a major theme of free-form responses to the consultation. Around two in five substantive stakeholder responses refer to protecting or promoting biodiversity through the strategy, as do around one in seven individual email responses.

> *"Broad leaved trees also provide the best means of delivering multiple benefits, for carbon, biodiversity, flood risk and other eco services, and direct access benefits for communities around population centres."* **Government agency**

As a result of these perceived benefits, substantive stakeholder responses say that it would not be acceptable for the action plan to allow for the loss of ancient woodland even if it was "offset" by extensive tree planting elsewhere. Specifically, many organisations raise concerns about the potential role of large-scale timber forestry – arguing that this is

not as beneficial for biodiversity as protecting native broadleaf woodland and allowing for natural regeneration.

> *"We would not want changes to the planning system to result in a situation where compensatory planting is used as a means of releasing protections on ancient woodlands. The value of older woodlands is in the soil, mycelium and associated biodiversity, this is irreplaceable and it is crucial that protections for ancient woodlands are strengthened or at the very least maintained."* **Membership organisation**

The theme of biodiversity net gain emerges in many responses – with numerous substantive stakeholder responses arguing that an action plan for trees, woodland and forestry should align with wider efforts to ensure biodiversity net gain. In addition to the biodiversity benefits that they are seen to offer, numerous responses highlight the wider benefits to the public of ancient woodland and veteran trees – particularly as a means of stimulating public engagement in woodland.

To provide this protection for ancient woodland (and woodland in general), substantive stakeholder responses particularly highlight three priorities:

- Changing planning laws to protect ancient woodland (mentioned in around one in ten substantive stakeholder responses)
- Introducing new rules for developers, including for contracts and grant approvals (again mentioned in around one in twenty responses)
- Providing local authorities with resources and support to ensure that legislation is implemented within planning and development decisions.

To better protect both ancient woodland and other forms of woodland, around one in six substantive stakeholder responses argue that there needs to be better enforcement of regulation – e.g. to prevent felling where this has not been approved. Many argue that the penalties for breaching regulations – and specifically Tree Preservation Orders (TPOs) – need to be made tougher. Around one in eight stakeholder organisations say that regulations around TPOs should be amended to make them stricter. Reflecting a wider trend among the responses, one environmental NGO says that "*the fine for breaching a TPO is not sufficient to deter developers in areas where land values are high.*"

Reducing the use of plastics in forestry

Q19: What actions would be most effective in reducing the use of plastics in forestry? *Total number of responses to question: 1429*

There is no overall consensus on the most important priority for reducing the use of plastics in forestry. Around three in ten (29%) selected "promoting the use of non-plastic tree guards" as their top priority for reducing the use of plastics in forestry. A similar proportion (27%) selected "supporting further testing and trial of non-plastic alternatives such as tree guards".

Around one in six (15%) selected each of “introducing stronger control on the recovery and disposal of plastics in grant agreements and public sector contracts” and “providing support to land managers for deer control and fencing”.

For foresters, the latter option – providing support to land managers for deer control and fencing – is the most popular. Around half of foresters (46%) selected this as their preferred option for reducing the use of plastics in forestry.

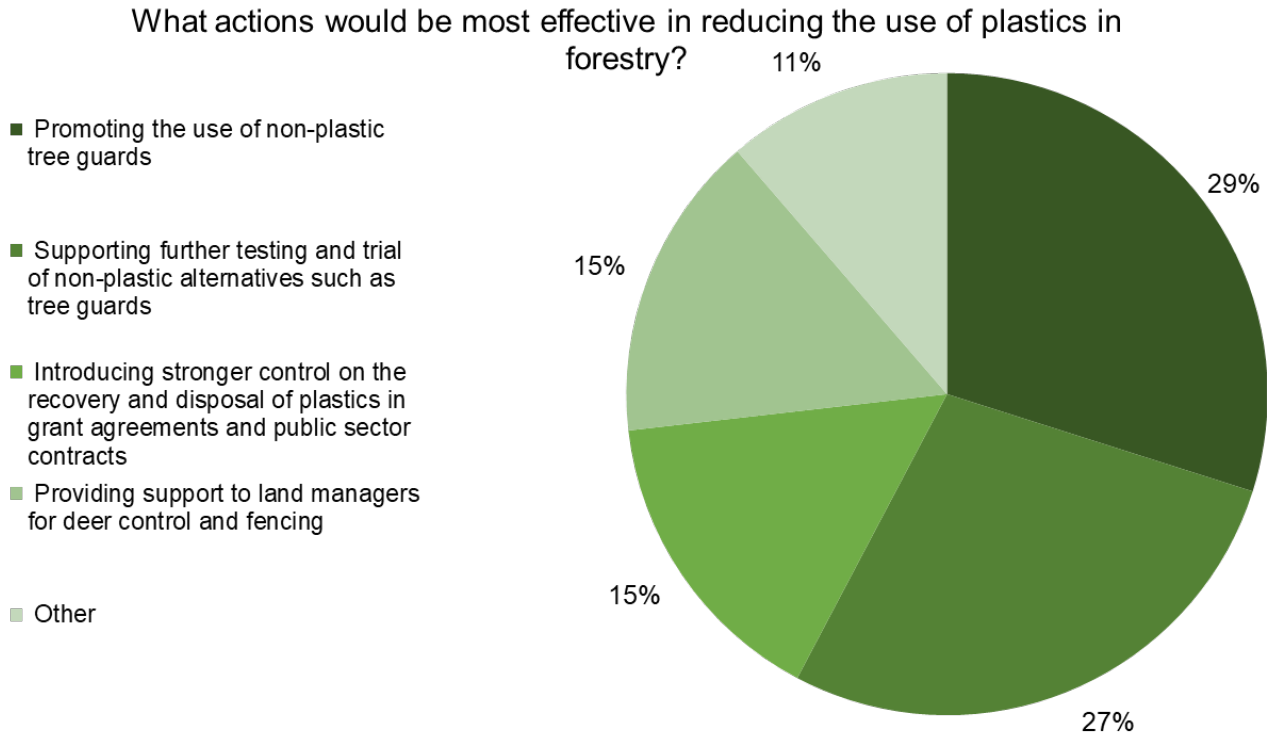

Figure 10: actions to reduce the use of plastics in forestry (Q19). *Base: all responses to survey (n=1429 (Q19)) | Responses below a certain percentage omitted for clarity. Source: ETS Consultation, June – September 2020*

Around one in ten respondents (11%) chose “other” at this question. This is largely driven by the response of environmental NGOs. Key themes of these responses include:

- Encouraging or mandating the use of biodegradable or natural equipment – 7% of all responses fall under this theme, including 19% of all responses from environmental NGOs.
- Promoting natural regeneration or rewilding instead of planting trees with plastic tree guards – 7%, including 15% of responses from environmental NGOs.

Other themes mentioned in the “other” responses include:

- Funding research / development of suitable alternatives (4%)
- Banning plastic use (4%)
- Managing the deer population (general comments – culling not explicitly mentioned) (4%)

- Incentivising the collecting / re-use / recycling of redundant plastics in the countryside (3%)
- Promoting the use of fencing (2%)
- Managing the deer population specifically through culling (2%)

Overcoming financial barriers to woodland management

Q20: Which actions would overcome financial barriers to woodland management?
Total number of responses to question: 1389

Q21: Which actions would be most effective at overcoming the financial barriers to woodland management? *Total number of responses to question: 1332*

Increasing grant support for management activities and restoration of Plantations on Ancient Woodland Sites (PAWS) are selected as the key actions that can help overcome financial barriers to woodland management. Additionally, greater information and support regarding the domestic timber industry, as well as requiring more domestic timber through public procurement policies, are also likely to be seen as helpful.

Around half of consultation respondents (53%) selected “providing grant support for a wider range of management activities” in their top three priorities. Support is particularly strong among local authorities (68% selected this in their top three), foresters (62%), land-owners (60%) and environmental NGOs (59%).

Around two in five (42%) selected “providing grant support for the restoration of Plantations on Ancient Woodlands Sites (PAWS)”. Support is particularly high among members of the public (54% selected this in their top three) and environmental NGOs (47%).

A similar proportion (39%) selected “Government requiring more domestic timber through procurement policies”. Support is again particularly strong among environmental NGOs (45%) and foresters (41%).

Around a third (35%) selected “support for land owner collaboration in woodland management”. Local authorities (40%) and members of the public (37%) are particularly likely to support this.

For foresters, providing support for woodland infrastructure such as roading is a key priority. Around half (48%) selected this as one of their top three priorities, behind “providing grant support for a wider range of management activities” (62%) and ahead of “Government requiring more domestic timber through procurement policies” (41%).

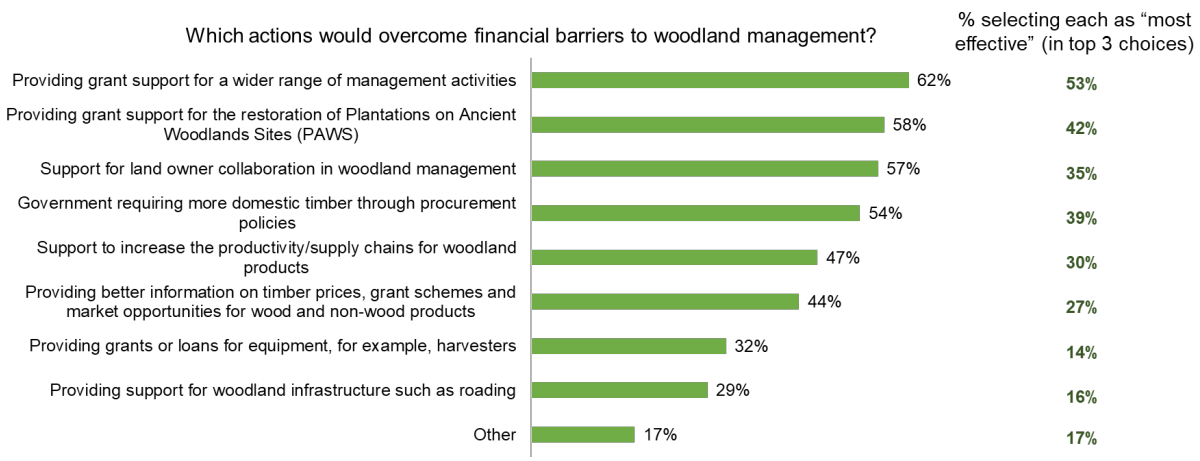

Figure 11: actions to overcome financial barriers to woodland management (Q20 / Q21). *Base: all responses to survey (n=1389 (Q20), n=1332 (Q21)). Source: ETS Consultation, June – September 2020*

Approximately one in six (17%) selected an "other" response as one of their top three priorities for overcoming financial barriers to woodland management. Among these open-text responses, providing grant support (e.g. for non-commercial woodland, for creation of wildlife habitats, for deer management) is a particularly prominent theme – 8% of all responses to this question are open-ended text which refers to this theme.

> *"Introducing grant support for management of small woodlands (<0.5ha) and networks of small woodlands."* **Environmental NGO**

> *"Provide funding via the grant scheme for ongoing professional advice for woodland management beyond the original management plan to encourage long term management."* **Forester**

Other prominent themes from the open-ended responses are:

- Supporting the timber industry, e.g. encouraging a wider use of timber in building, creating markets for timber products, removing VAT from firewood sales – 6% of all responses touch on this theme. These responses are particularly common among foresters.
- Supporting communities and non-profits (e.g. in acquiring land for woodland creation, in delivering woodland management) – 4%.
- Providing training on woodland management – 2%.

Around a third of the substantive stakeholder responses, including many of the responses from key stakeholder organisations, argue that it is important to provide ongoing financial support for maintenance and aftercare. Bringing existing woodlands into management is referred to by around a quarter of the substantive stakeholder responses.

Numerous organisations highlight their belief that the ongoing maintenance and management of woodland is of huge importance to the success of a major intervention such as an action plan for trees, woodland and forestry and say that "*there should be*

funding support that recognises the value of managing existing woodlands for their multiple public benefits." (Association). Many comments say that, while it can be very attractive to prioritise woodland creation, such long-term management is often just as important.

Many substantive stakeholder responses argue that there is a pressing need for equivalence between the financial support for woodland management and for other land uses – with responses saying that it is currently not financially sustainable for land-owners, managers and farmers to manage their woodlands. Many of these responses argue there should be greater incentives for farmers to prioritise woodland when (in the words of one environmental NGO) "*for many farmers this resource is viewed as unproductive and contributing little to farm revenues*".

Specifically, numerous substantive stakeholder responses say that farmers and land-owners should be rewarded for the public good and ecosystem services that trees and woodland provide. Around a quarter of substantive stakeholder responses refer to formally recognising the value of ecosystem services. For example, one response (from the "other stakeholder" category) argues: *"there should be funding support (whether public or private) that recognises the value of managing existing woodlands for the multiple ecosystem services that they provide."*

Addressing the non-financial barriers to woodland management

Q22: Which actions would address the non-financial barriers to woodland management? *Total number of responses to question: 1377*

Q23: Which actions would address the non-financial barriers to woodland management? *Total number of responses to question: 1339*

Access to woodland management services, training for agricultural workers, greater visibility of sustainable management and education among public, investors and land-owners/managers are seen as important measures to help address non-financial barriers to woodland management.

Around two thirds of respondents (64%) selected "providing user-friendly woodland management services aimed at 'non-forester' woodland owners" in their top three actions for addressing the non-financial barriers to woodland management.

Three in five (58%) selected "training to increase the forestry skills capacity in agricultural workers". Similar proportions selected "ensuring public recognition of woodlands that are managed sustainably" (54%) and "providing better communication of the benefits and need for woodland management with land managers and investors" (52%).

Support for each of the options is largely consistent across audience subgroups. "Providing better communication of the benefits and need for woodland management with

land managers and investors" is particularly popular among local authorities (61% selected this), foresters (60%) and environmental NGOs (57%), placing it in the top two for each of these audiences.

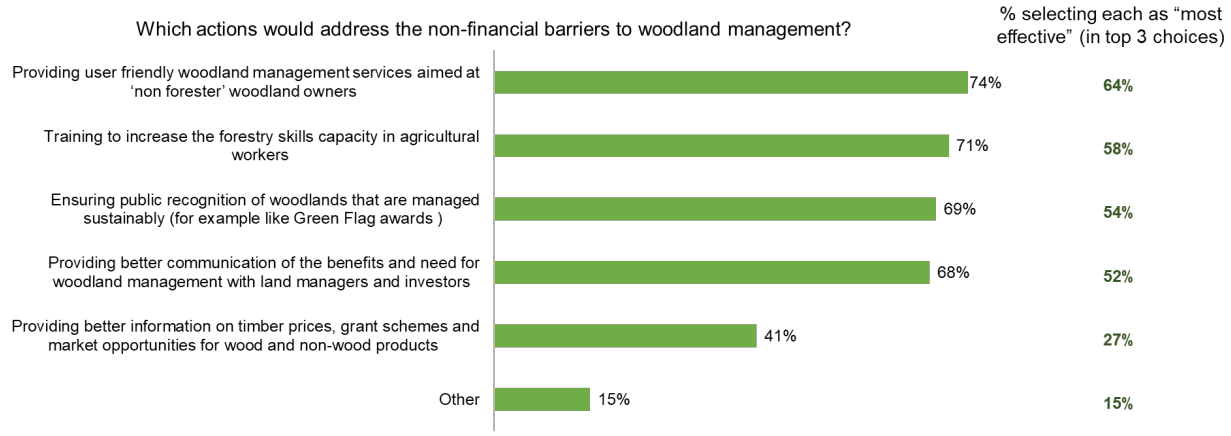

Figure 12: actions to address the non-financial barriers to woodland management (Q22 / Q23). *Base: all responses to survey (n=1377 (Q22), n=1339 (Q23)). Source: ETS Consultation, June – September 2020*

Around one in six (15%) selected an "other" response as one of their top three choices. There are relatively few consistent themes among these responses – key themes are:

- Educating the public on the benefits of creating wildlife habitats (5%)
- Facilitating public / community involvement (5%)
- Educating land owners / stakeholders on the benefits of creating wildlife habitats (4%)
- Delivering training (on forestry skills, woodland management) (4%)
- Promoting forestry as a career (2%)
- Promoting natural regeneration / rewilding (2%)

Many substantive stakeholder responses highlight the importance of addressing the non-financial barriers to woodland management. Specifically, responses typically refer to the following themes:

- Facilitating community and public involvement (mentioned in approx. a third of substantive responses to the consultation)
- Educating the public (mentioned in approx. a quarter of substantive responses)
- Promoting woodland related careers to address lack of skills/staff shortages (mentioned in approx. a quarter of substantive responses)
- Educating land-owners/managers/farmers (mentioned in approx. one in five substantive responses)
- Providing training opportunities (mentioned in approx. one in five substantive responses)
- Providing access to expert advice and resources (mentioned in approx. one in five substantive responses)

Many stakeholder organisations emphasise the role of education, training and upskilling among land managers, owners and industry professionals in overcoming these barriers.

> *"Farmers should be equipped with the correct advice and guidance but given the flexibility and confidence to determine where is best to plant on their own land."*
> **Membership organisation**

Regulatory barriers to woodland management

Q24: Which actions would overcome the regulatory barriers to woodland management? *Total number of responses to question: 1250*

Q25: Which actions would be most effective at overcoming the regulatory barriers to woodland management? *Total number of responses to question: 1168*

Respondents say that mandating woodland management for all land-owners and simplifying the delivery of existing regulations would be most effective in helping overcome regulatory barriers to woodland management.

When asked to choose the most effective way of overcoming regulatory barriers to woodland management, 45% of all respondents chose "placing a legal obligation on all land-owners to manage their woodland". This option is very popular among members of the public, with more than half (56%) selecting this. It is also well supported by environmental NGOs, with two in five (41%) choosing this. However, it is notably less popular among other audiences – it is chosen by one in five land-owners (22%) and three in ten foresters (29%).

For land-owners and foresters, the most popular option is "streamlining the delivery of current regulations". Around a quarter of all respondents (27%) chose this, and this figure rises to more than half of foresters (55%) and land-owners (53%).

Local authorities are relatively split on the best option – around two in five selected each of the two most popular options listed above (40% selected placing a legal obligation on land-owners, 37% selected streamlining the delivery of current regulations).

Support for placing responsibility for compliance on the woodland manager rather than the woodland owner is largely driven by members of the public. 14% of all respondents selected this, including one in five members of the public (19%). Support among other audiences is generally lower.

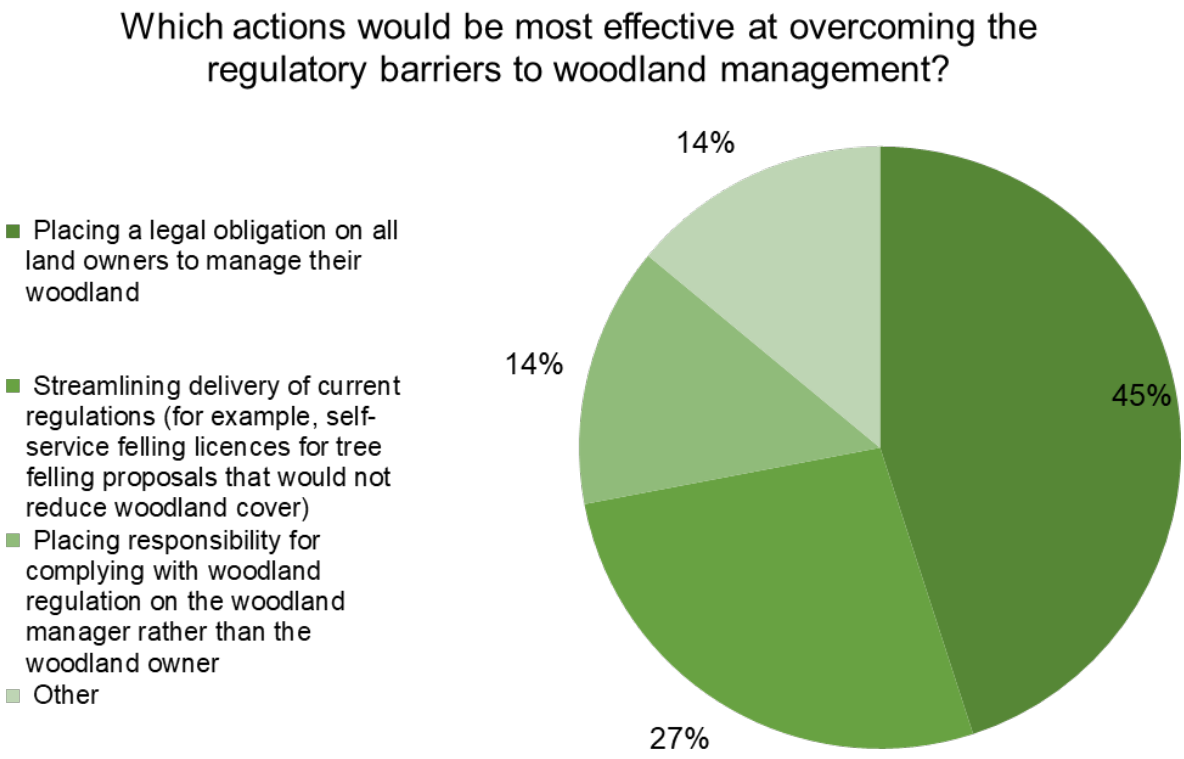

Figure 13: actions considered most effective in overcoming the regulatory barriers to woodland management (Q25). *Base: all responses to survey (n=1168 (Q25)). Source: ETS Consultation, June – September 2020*

Around one in seven (14%) selected an "other" response at this question. This includes a third of environmental NGOs (33%). Key themes of the open-ended responses to Q24 include:

- Reducing / simplifying regulation (mentioned in 6% of responses)
- Providing advice and support to land-owners (4%)
- Better enforcement of regulation (4%)
- Increase / stricter regulation (4%)
- Promoting natural regeneration / rewilding (3%).

Bringing SSSI woodland into management

Q26: 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? *Total number of responses to question: 459*

Around one in three responses to this question refer to providing financial support – many are generic comments about a need for more grant funding, although some comments refer to a perceived need for tax incentives or grants to pay for expert advice. Consistent

with responses to other areas of the consultation, a prominent theme is the perceived need to recognise financially ecosystem services provided by woodland management.

> *"Grant funding. Owners of such woodland should receive public money for delivery public goods to an agreed plan. At present actions are a cost to the owner which means most won't be proactive."* **Forester**

Around one in three responses refer to the value of providing guidance and advice – particularly access to clear information or expert advice on how to manage woodland.

> *"Provision of pragmatic advice to owners to promote effective and financially rewarding management operations."* **Forester**

Around one in six responses refer to wanting greater independence or flexibility (e.g. reducing regulation, and reducing involvement of Natural England). A common theme is wanting greater streamlining of Natural England's decision-making processes:

> *"Not having to ask Natural England for permission every time we want to do something in the woodland management plan that has already been agreed."* **Land manager**

Other less prominent themes are:

- Educating about benefits of management
- Simplifying grant application process (e.g. simpler forms, clearer eligibility criteria).

Improving England's plant biosecurity

Q27: Which of the following actions would be most effective in improving plant biosecurity across England's trees and woodlands? *Total number of responses to question: 1378*

A majority of consultation respondents say that supporting domestic nurseries is the best way to improve plant biosecurity. Ensuring supplier compliance with the Plant Health Management Standard, managing the impact of invasive, non-native species and increasing the number of 'Plant Healthy' certified nurseries are also seen as effective steps.

More than half of consultation respondents (53%) selected "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" as one of their top two priorities for improving plant biosecurity. This figure is consistently high across all audiences, and particularly high among environmental NGOs – around two thirds of environmental NGOs (64%) selected this.

Around a third (35%) selected "introducing conditions to public sector contracts and government tree planting or restocking grants that require suppliers to meet the Plant

Health Management Standard". Around three in ten (28%) selected "managing the impact of invasive non-native plants which provide a pathway for disease through targeted action, ongoing management and monitoring, and wider education". Both these figures are relatively consistent across all audience subgroups.

A quarter (25%) selected "increasing the number of nurseries that meet the Plant Health Management Standard". This is the most popular option among foresters, with more than half (55%) selecting this in their top two. It is also very popular among local authorities – 45% of local authorities selected this, comparable with the 45% who selected developing a supply of diverse and locally-appropriate seed and planting material. These are the most popular two options among this audience.

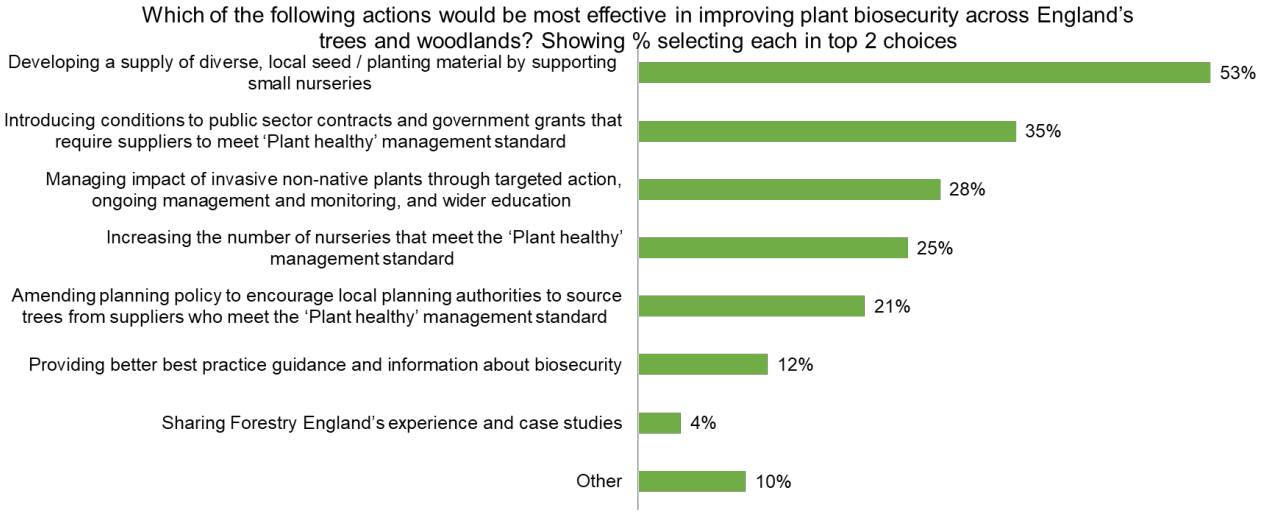

Figure 14: actions to improve plant biosecurity across England's trees and woodlands (Q27). *Base: all responses to survey (n=1378 (Q27)). Source: ETS Consultation, June – September 2020*

One in ten respondents (10%) include an "other" option in their top two choices for improving plant biosecurity across England's trees and woodlands. The main theme among these open-ended responses is around preventing, restricting or monitoring imports (through stricter legislation, more inspectors, more fines and stricter border control, including quarantine). 9% of all responses include references to this topic – and these are particularly common among local authorities (18% of their responses include references to this theme) and land-owners (13%).

Many comments refer to stricter border controls, and even an outright import ban:

> *"Increase controls on imported material, particularly for widely available locally grown species."* **Local authority**

Others specifically mention ideas including creating a register of approved species, introducing biosecurity "passports" for imported trees and focussing on perceived repeat offenders. Other themes among the open-ended "other" responses are:

- Promoting natural regeneration / rewilding (addressed by 4% of responses)

- Supporting domestic nurseries (4%)
- Educating and raising awareness, e.g. through Forestry Commission seminars (3%)
- Using only domestically produced planting stock (3%)
- Monitoring compliance (2%).

The biosecurity of England's plants and trees was also a major theme of the substantive stakeholder responses to the consultation. Around one in seven substantive stakeholder responses refer to the need to prevent, restrict or more closely monitor imports – suggesting, for example, more inspections at the border, more substantial fines or longer quarantine periods. Equally, respondents say that the emphasis should be placed on domestic resources over imports, particularly in the context of tree planting.

> *"The Strategy should focus on what is available within the UK (diversity of species, age and populations to build resilience) before bringing in non-native material, which could be hosts to pest and pathogens or be a potential invasive species and threaten native biodiversity."* **Other stakeholder**

Linked to this (and to pillar four, supporting the economy), three in ten substantive stakeholder responses refer to supporting domestic nurseries and breeding programmes.

Contributing to climate change mitigation and helping achieve net zero

Q28: 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? *Total number of responses to question: 1416*

Respondents view the planting of predominantly native woodland and the strengthening of protection of all woodland as the main priorities for mitigating climate change and helping achieve net zero.

Around two thirds of consultation respondents (66%) selected "planting predominantly native woodland to act as a long term store of carbon" as one of their top three choices. A similar proportion (62%) selected "strengthening the protection of all woodland to reduce greenhouse gas emissions from deforestation".

Around half (49%) selected "encouraging agroforestry to increase the amount of carbon stored on productive farmland". 44% selected "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".

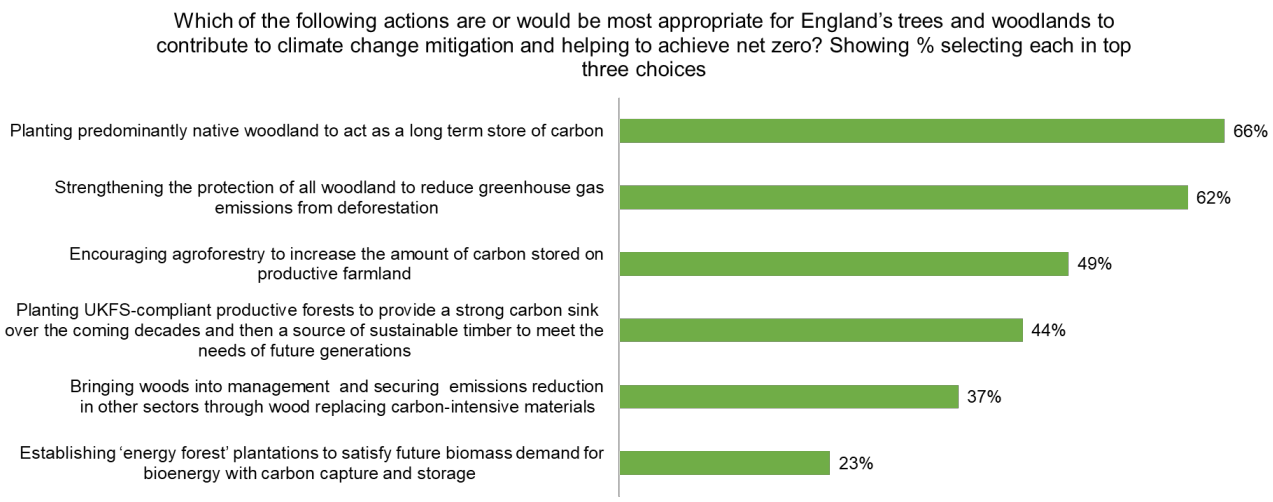

Figure 15: most appropriate actions for England's trees and woodlands to contribute to climate change mitigation and help to achieve net zero (Q28). *Base: all responses to survey (n=1416 (Q28)). Source: ETS Consultation, June – September 2020*

For foresters, the key priorities are different. Their top priorities are:

- "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" (selected by 76% in their top three)
- "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)" (66%)
- "encouraging agroforestry to increase the amount of carbon stored on productive farmland" (40%)
- "establishing 'energy forest' plantations (short rotation coppice and short rotation forestry) to satisfy future biomass demand for bioenergy with carbon capture and storage" (37%).

Bringing woods into management is also a priority for local authority respondents. More than three in five (64%) selected this option as one of their top three priorities – making it the most widely selected priority among local authorities, ahead of planting predominantly native woodland (60%) and strengthening the protection of all woodland (54%).

Among land-owners, the key priorities are planting predominantly native woodland (61%), planting UKFS-compliant productive forests (51%) and strengthening protection of all woodland (46%). For other audiences, priorities broadly reflect the overall trend.

A strong emphasis was placed in the free-form substantive responses on the need to build resilience against climate change – around one in five substantive stakeholder responses refer to this, as do around one in seven individual email responses. These responses frequently cite the role that trees and woodland can play in addressing the impacts of climate change, as well as in tackling the process of climate change itself:

"Trees, woodlands and other habitats offer a nature-based solution to climate change. The strategy has a key role to play in delivering more trees and woodland as a nature-based solution to climate change and part of a wider Nature Recovery Network of diverse habitats." **Environmental NGO**

Some also say that, when planting or replacing trees, care must be taken to ensure that species will be resilient to climate change: *"species must be chosen that not only reflect local character but that will be resilient to a future changing climate and provide maximum ecosystem services to residents."* **Membership organisation**

Reducing damage to trees and woodlands caused by deer

Q29: Which of these actions would be most effective in reducing damage to trees and woodlands caused by deer? *Total number of responses to question: 1376*

Increasing tree protection mechanisms, and developing a national policy on sustainable deer management and control, are highlighted as the most effective actions in reducing deer related damage to trees and woodlands.

Around 45% of all consultation respondents selected "supporting a range of approaches to tree protection, including fencing and other alternatives to plastic tree guards". Support for this is particularly high among members of the public (52% selected this as one of their top two priorities) and local authorities (51%).

About 44% of all consultation respondents selected "develop a national policy on sustainable deer management and control measures". There is broad consensus on this across all stakeholder types.

Around a quarter of respondents (23%) selected "incentives for the management of deer". Support is particularly strong among foresters (47% selected this as one of their top two) and land-owners (41%).

A similar proportion (22%) selected facilitating landscape scale control by land managers. This is particularly popular among foresters (38% selected this).

One in five (20%) selected "better advice and guidance on the value of and options to control damage by deer". Support is particularly strong among members of the public (26%).

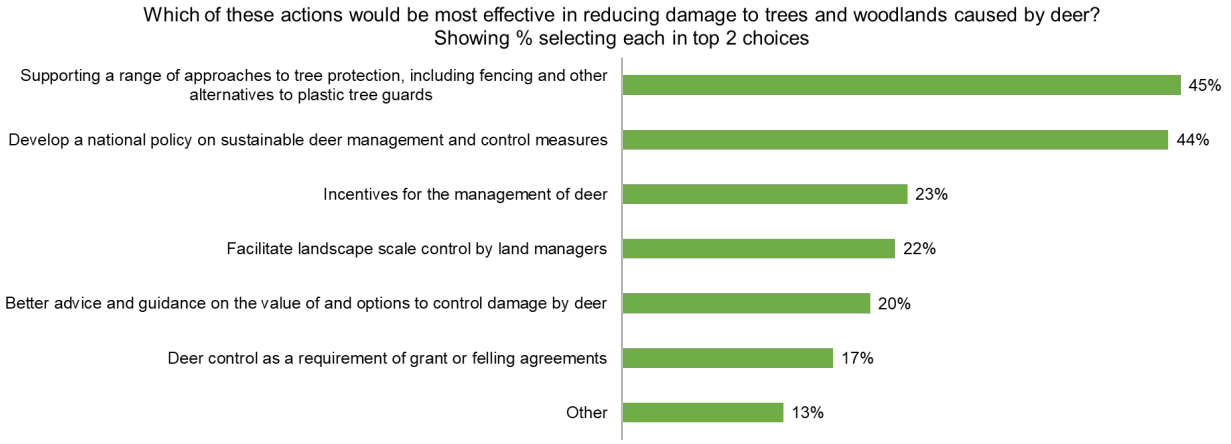

Figure 16: actions to reduce damage to trees and woodland caused by deer (Q29). *Base: all responses to survey (n=1376 (Q29)). Source: ETS Consultation, June – September 2020*

Around one in eight (13%) selected an "other" response here. Environmental NGOs are particularly likely to do this, with a quarter writing in an "other" response. A key theme of these responses is the perceived need to restore populations of deer predators (such as lynx and wolves) – around one in ten responses (9%, from across all stakeholder groups) falls under this theme.

> *"Pilot studies to explore the reintroduction of apex predators, such as lynx, to naturally control deer numbers."* **Environmental NGO**

Other prominent themes from the open-text responses include:

- Promoting the venison industry (5%)
- Managing the deer population through culling (3%)
- Managing the deer population (general comments – culling not explicitly mentioned) (2%)
- Install fencing and / or regional controls (2%).

Reducing damage to trees and woodlands caused by grey squirrels

Q30: Which of these actions would be most effective in reducing damage to trees and woodlands caused by grey squirrels? *Total number of responses to question: 1398*

The reintroduction of natural predators is widely selected as one of the most effective solutions in reducing grey squirrel driven damage to trees and woodlands. Additionally, providing management incentives and researching contraception options are also seen as helpful measures.

Around seven in ten consultation respondents (72%) chose reintroducing animals to help control squirrels as one of their top two priorities. Support is particularly strong among members of the public (85%), environmental NGOs (78%) and local authorities (67%).

Around three in ten chose providing incentives for the management of grey squirrel (32%), and a similar proportion chose researching contraception to prevent breeding (31%). Support for incentives is particularly high among land-owners (58% selected this) and foresters (56%). Support for contraception research is strong among foresters (40%).

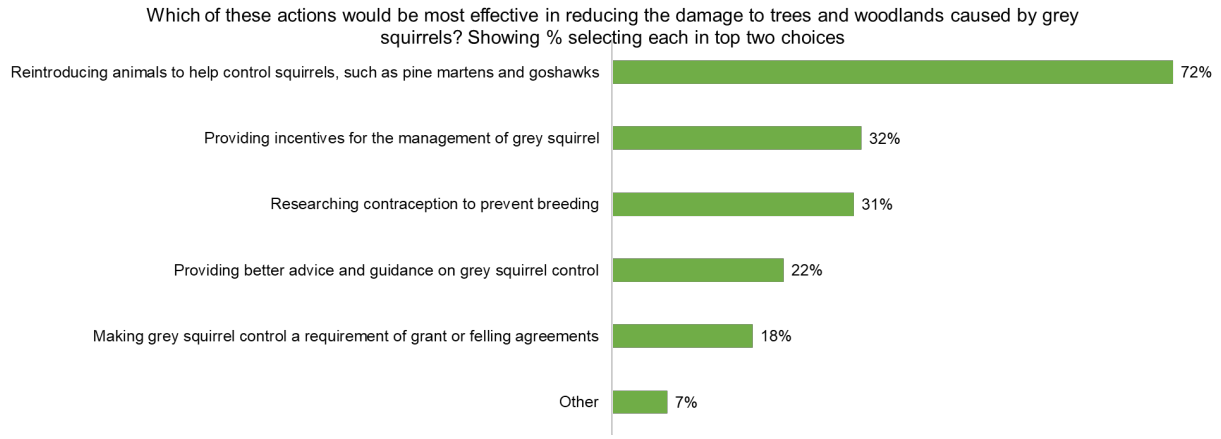

Figure 17: actions to reduce the damage to trees and woodland caused by grey squirrels (Q30). *Base: all responses to survey (n=1398 (Q30)). Source: ETS Consultation, June – September 2020*

Around one in twenty respondents (7%) chose to provide an "other" response to this question. Key themes from these open-ended responses are:

- Restoring natural predators (4%)
- Managing the grey squirrel population (general comments – culling not explicitly mentioned) (3%)
- Managing the grey squirrel population through culling (2%)
- Supporting land-owners in controlling grey squirrels (2%)
- Educating the public on the impact of grey squirrels (2%)
- Ensuring that grey squirrels are unharmed (2%).

Deer and squirrel management are relatively prominent themes among the substantive stakeholder responses to the consultation, referred to by around one in six. Many of these responses refer to a need to reduce deer or squirrel numbers, without being explicit about how to do this – as exemplified by the comment below:

> *"The strategy should provide specific details of significant measures to develop, promote and incentivise effective deer and squirrel control in order to ensure successful establishment and development of high-quality trees and woodland."*
> **Environmental NGO**

3. Engaging people with trees and woodland

In this section, we have outlined the responses to the third pillar of the consultation: engaging people with trees and woodland.

Summary of key themes

Planting trees in urban areas

Consultation respondents believe that national policy is required to increase the number and coverage of trees in and around urban areas. Requiring the development and implementation of local strategies across the country is seen as a good way to deliver this. Recognising trees and woodlands as key components of green infrastructure and setting local targets for tree canopy cover are the actions most widely considered likely to be effective in helping the preparation and implementation of local tree and woodland strategies. Many respondents also want new rules which mandate tree planting in new developments.

Practical challenges are seen as a key barrier to securing and maintaining street trees – particularly among local authority stakeholders.

Community-level engagement

Improving / maintaining public access to green spaces is considered essential. Many responses point to the role played by green spaces during the COVID-19 pandemic, specifically in the context of the public's physical and mental health. Creating new accessible woodlands in and around towns and cities is seen as an effective way to address barriers to access to trees and woodlands. Some substantive stakeholder responses say it is important that rights of way are preserved and that public access is not diminished as part of tree planting initiatives.

Measures to boost community participation in local woodland – both in managing these and decision-making around them – are widely seen as priorities. Community forests are considered an important way of delivering this public engagement: providing opportunities to reach a diverse audience and deliver an understanding of important issues relating to trees and woodland.

Barriers to securing and maintaining street trees

Q31: Are any of the following significant barriers to securing and maintaining street trees? *Total number of responses to question: 1285*

Practical challenges, appropriate standards and guidance, and funding and skills (both for delivering new trees as well as maintenance) are all widely considered key barriers to securing and maintaining street trees.

Approximately three quarters of consultation respondents (73%) selected “the funding and skills for ongoing maintenance of street trees over their lifetime” as one of the top 3 barriers. Around half selected “the skills and resources needed to deliver new street trees, including funding for planting” and “practical challenges in terms of street design, planting requirements and compatibility with other infrastructure provision” (55% and 49% respectively).

Local authority stakeholders are particularly likely to see practical challenges as a key barrier – three quarters selected this as a key barrier, compared to half of all respondents.

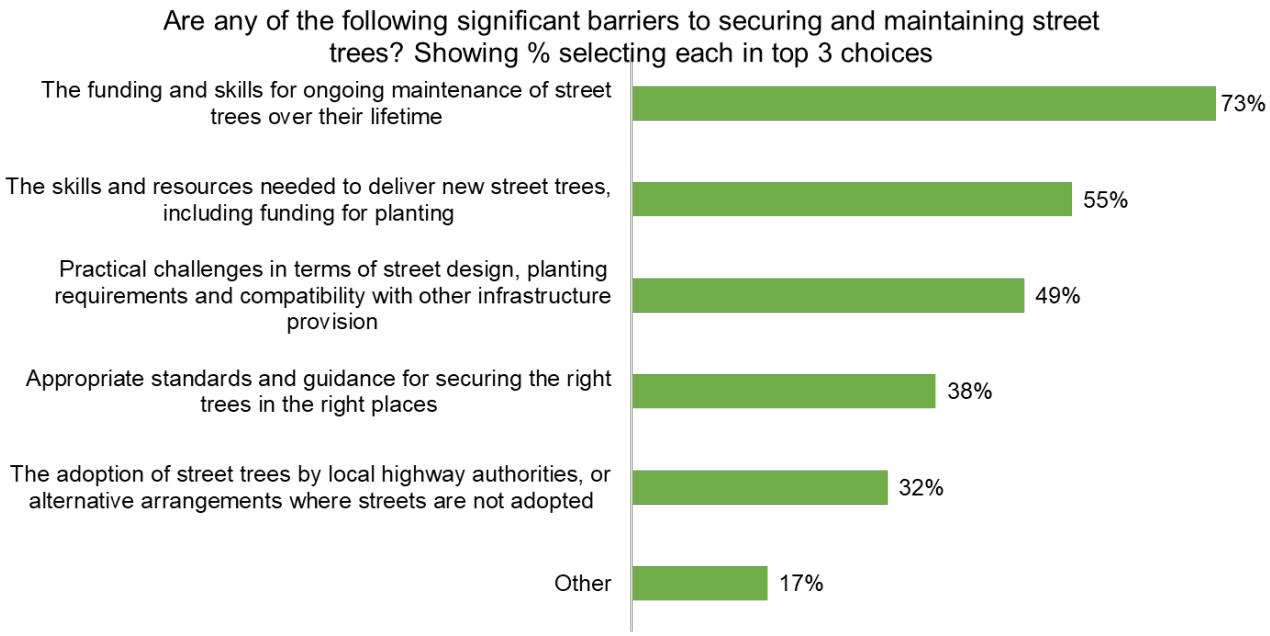

Figure 18: barriers to securing and maintaining street trees (Q31). *Base: all responses to survey (n=1285 (Q31)). Source: ETS Consultation, June – September 2020*

Around one in six respondents to the consultation (17%) wrote in an “other” response in open text. A major theme of these open-text responses is local government prioritisation of street trees – 12% of consultation respondents wrote in an open-text response which relates to this theme. A central theme of these responses is the perceived mindset of local authorities (including both staff and elected representatives), which numerous respondents say is typically opposed to trees – for example, one member of the public says that councils “*show a disregard for street trees.*”

Other key themes from the open-end responses include planning laws and planning processes – around one in 20 (7%) provided a response which related to this theme and funding for the maintenance of street trees (6%). Public awareness and education is mentioned by around 5% of respondents.

Overcoming barriers to securing and maintaining street trees

Q32: How could government overcome the barriers to securing and maintaining street trees you have identified in question 30 [sic.][1]**?** *Total number of responses to question: 883*

In their free-form responses to an open-ended question about overcoming these barriers, consultation respondents refer primarily to three key activities – these themes are each mentioned by between one in five and one in three respondents. They are - collaborate with/support local authorities; introduce new rules for developers; and funding for the maintenance of street trees.

1. Collaborate with / support local authorities

The need for national government to work closely with local authorities emerges repeatedly as a key theme under this pillar of the consultation. For some, this is closely linked to the belief that local authorities are best placed to deliver the nuts and bolts of planting and securing street trees. Specifically, many mention the budgetary pressures faced by local authorities and argue that LAs would need "*ringfenced Government finance*" (in the words of one member of the public) to be able to deliver their important role in the context of the wider action plan on trees, woodland and forestry. Comments are often similar to that of one respondent (from the "other stakeholder" category), who argues that this money is needed "*to recruit qualified staff, to write and implement tree strategies and to plant and care for street trees."*

Linked to the argument for greater funding is the need to ensure that local authority staff working in this area have the necessary skills to carry out their role in relation to street trees. Comments under this theme range from the provision of overarching, nationally consistent guidance, to funding which would allow for the upskilling of specific members of staff in how best to plant and maintain street trees:

> *"National guidance/regulation/requirement rolled out at a local level to ensure at least a minimum planting and maintenance of street trees."* **Member of the public**

2. Introduce new rules for developers

Many respondents to the consultation see a need for new rules around planning and development – and this is seen as a particularly important priority in the context of street

[1] This was an error in the consultation text. However, responses to this question indicate that there was almost no misunderstanding that this question actually referred to q31.

trees. For some, the primary focus of these rules is to protect existing trees – in other words, making it harder for street trees to be removed as part of construction work.

Respondents (particularly local authorities) argue that this can be done by "*more aggressive legislation and giving trees a much higher consideration when assessing planning applications.*" Consistent with a theme highlighted earlier in this report, fines for breaching Tree Preservation Orders are also considered not strong enough. One local authority respondent says that legislation should "*not allow developers to remove trees just because it is a cheaper option than using engineered options which would save the trees*."

For many, the emphasis is more on tree establishment – by requiring developers to plant new trees when delivering projects. Many see a requirement for developers to fund street planting (and ongoing management of street trees on their sites) as an easy way to expand tree coverage, particularly in urban areas. Some respondents argue that any legislation on this should also place an emphasis on the quality of tree planting by developers – for example, one local authority says that this can be done by providing guidance, training and "*using best practice methods such as root barriers and deflectors, irrigation and aeration systems, underground guying and root cells to provide the required growing medium and quantity."*

3. Funding for the maintenance of street trees

Closely linked to responses about the role of local authorities, many responses referred to the need for funding to be made available for the maintenance of street trees. This is driven by a concern that the aftercare for street trees is easy to neglect – and that while it may be easy to plant new street trees, the maintenance of them is essential to preserving tree coverage in urban areas and to reducing our carbon footprint. Some respondents highlighted specific concerns about effectively managing mature, larger trees in ways that mean that they do not have to be cut down – often citing examples of trees which have been cut down and seeing this as the result of poor management. One theme of such responses is the importance of training for local authorities – for example, a land-owner said relevant council staff should be trained *"to understand what aftercare and maintenance is needed after initial planting to ensure the health and longevity of trees, and to be properly funded to do this."*

Numerous secondary priorities also emerged from the responses – with the following themes raised by between one in ten and one in six respondents to the consultation in response to this question:

- **Facilitate public / community involvement** (e.g. grants to community groups, volunteering groups, charities)
- **Funding for planting of street trees**
- **Provide training** (e.g. for volunteers, local authorities, communities, re-education of planners and civil engineers)
- **Set local authority targets** (for tree coverage, woodland creation)

- **Educate public** (on benefits of street trees, increase public desire for street trees through more awareness, provide standards and advice on tree planting)
- **Prevent/penalise bad practices** (e.g. destruction or lack of planting, felling trees, utility companies harming trees)

In their open-text responses, local authorities are particularly supportive of the top three priorities given here:

- Collaborate with / support local authorities is mentioned in the responses of 38% of local authorities
- Introduce new rules for developers: 38%
- Funding for maintenance of street trees: 32%

Increasing number / coverage of trees in and around urban areas

Q33: Which of these actions would be most effective in increasing the number/coverage of trees in and around urban areas? *Total number of responses to question: 1345*

The development and implementation of local tree and woodland strategies and local planning policies, and promotion through national policy, are by far the most popular options for increasing the number / coverage of trees in and around urban areas. Around seven in ten respondents (69%) selected “development and implementation of local tree and woodland strategies and local planning policies” as one of their top three priorities. Three in five (58%) selected promotion through national policy; two in five (42%) selected creating new community forests in areas of greatest need.

Local authorities are particularly supportive of promotion through national policy (selected by 75% of local authority respondents) and promotion through national guidance (58%).

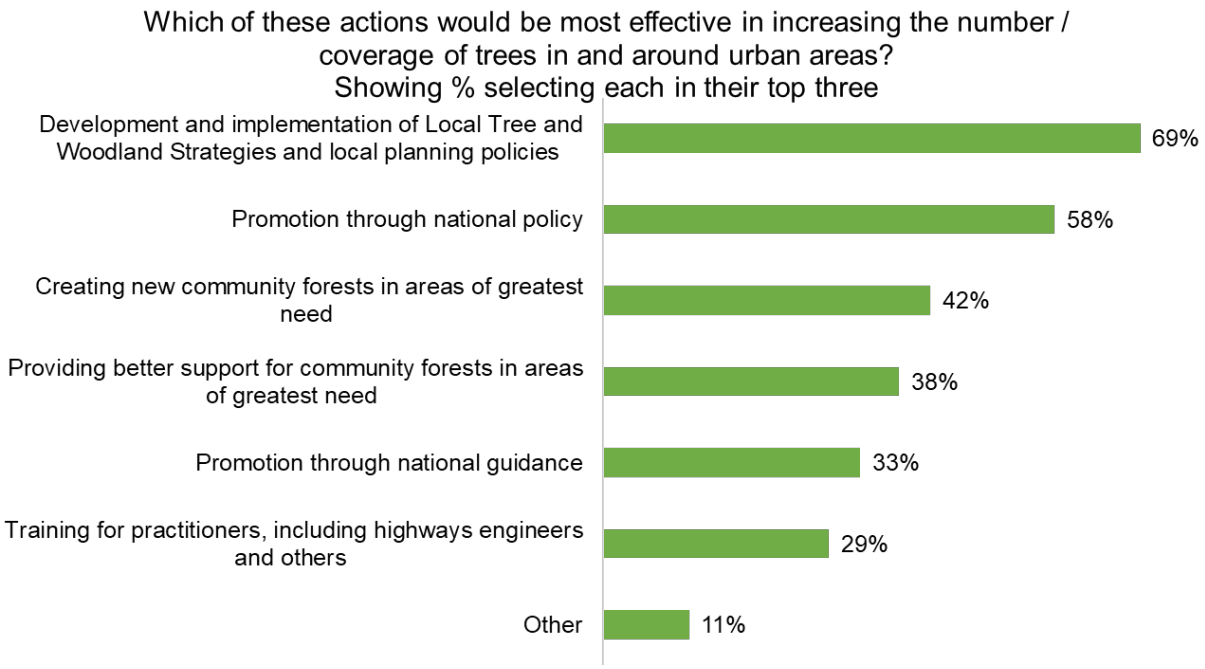

Figure 19: actions to increase the number / coverage of trees in and around urban areas (Q33). *Base: all responses to survey (n=1345 (Q33)). Source: ETS Consultation, June – September 2020*

Around one in nine of all respondents (11%) selected an "other" option in their top three. There were two predominant themes of these open-text responses – facilitating public / community involvement (8% of respondents wrote in a response which fell under this theme) and incentivising the preservation of mature trees and planting of new trees (7%).

> *"Engage local people in the ownership of urban trees and woodlands."* **Forester**

> *"Clear enforceable targets are required, the challenge of tree canopy is for all councils and landowners to commit."* **Environmental NGO**

Around three in ten of all substantive stakeholder responses refer to the importance of promoting tree planting in urban and peri-urban areas. Comments under this theme tend to refer to the value of doing this – particularly for the public's physical and mental health.

Other comments in the substantive stakeholder responses suggest that there are multiple ways of achieving this tree planting – including partnerships between the private sector and charities. Consistent with other responses to the consultation, many highlight the crucial role that local authorities are likely to play in any efforts to promote tree planting in urban and peri-urban areas – and argue that they will need increased funding and resources to be able to deliver against this goal. Some also challenge the viability of ensuring that every new street is tree-lined and suggest that further work is needed on understanding how to achieve this:

> *"Guidance must be supplied on what constitutes a tree lined street. These trees must be planted following the ethos of 'right tree in the right place' and ensure accessibility on pavements is maintained."* **Membership organisation**

Preparation and implementation of local tree and woodland strategies

Q34: Which actions would most help the preparation and implementation of local tree and woodland strategies? *Total number of responses to question: 1315*

Recognising trees and woodlands as key components of green infrastructure and setting local targets for tree canopy cover are the most popular actions to help the preparation and implementation of local tree and woodland strategies.

Around three in five respondents (62%) selected “recognising trees and woodlands as key components of green infrastructure, with equal status to green and built infrastructure” as one of their top three priorities. Around half (49%) selected “setting local targets for tree canopy cover.” Around two in five selected “adopting local tree and woodland strategies as supplementary planning documents” (43%) and “strengthening technical expertise in tree and woodland management in local authorities” (39%).

Local authorities are particularly supportive of preparing national guidance on developing local tree and woodland strategies (48% selected this, compared to 36% of all respondents).

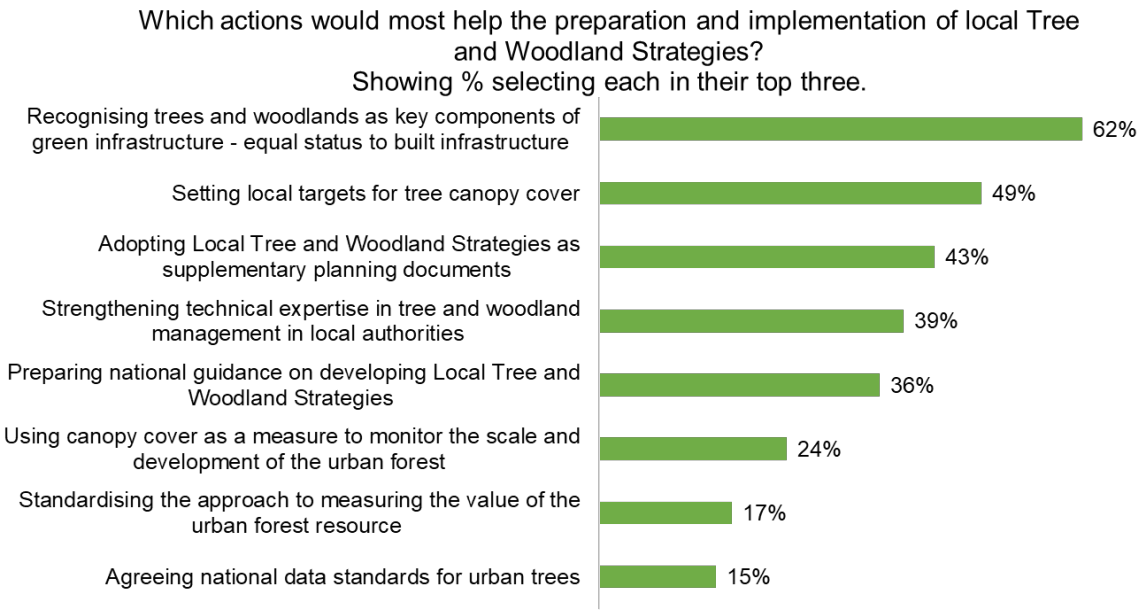

Figure 20: actions to help the preparation and implementation of local tree and woodland strategies (Q34). *Base: all responses to survey (n=1315 (Q34)). Source: ETS Consultation, June – September 2020*

Around a quarter of substantive stakeholder responses argue that there is a need to create local-level tree strategies. Around one in five say that there should be compulsory Local Nature Recovery Strategies. Substantive stakeholder responses under this theme argue that it is important to formally recognise the value of trees within local plans (under the National Planning Policy Framework) – for example, one environmental NGO argues

that "*this will really help to ensure that the true value of trees is recognised, that they are managed sustainably and new opportunities are identified for planting street trees and woodlands in the places that they are needed the most.*"

The theme of thoroughly planning where new trees are planted – and thinking carefully about a variety of considerations – emerges repeatedly among substantive stakeholder responses in connection with comments about local-level strategies. This is considered essential "*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*" (in the words of one environmental NGO).

Consistent with responses to other areas of the consultation, some argue that targets are an important element of local strategies – for example, one stakeholder (from the "other stakeholder" category) argues that "*Government should revise the NPPF to state that each Local Authority should develop a Tree and Woodland Strategy with an associated implementation plan and that the Local Plan should adopt a tree canopy target.*"

Linked to this, substantive stakeholder responses frequently make the case for providing local authorities with greater funding and resources, arguing that they will play a key role in many of the aspects of delivering this action plan.

Engaging people in the management and creation of local woodlands

Q35: Which actions would most effectively engage people in the management and creation of their local woodlands? *Total number of responses to question: 1324*

Measures to facilitate community group participation in local woodland – both in the management and decision-making – are widely seen as likely to be effective. Around half of respondents selected "enabling community groups to participate in the management of their local woodland" (50%) and "enabling community groups to influence decision-making about the management of their local woodland" (49%).

Two in five selected "providing legal support to community groups for the acquisition or lease of woodland" and "creating new community forests in areas of greatest need" (both 39%). Around a third selected "providing more training opportunities to support woodland management and creation" (33%) and "providing better support for community forests in areas of greatest need" (32%).

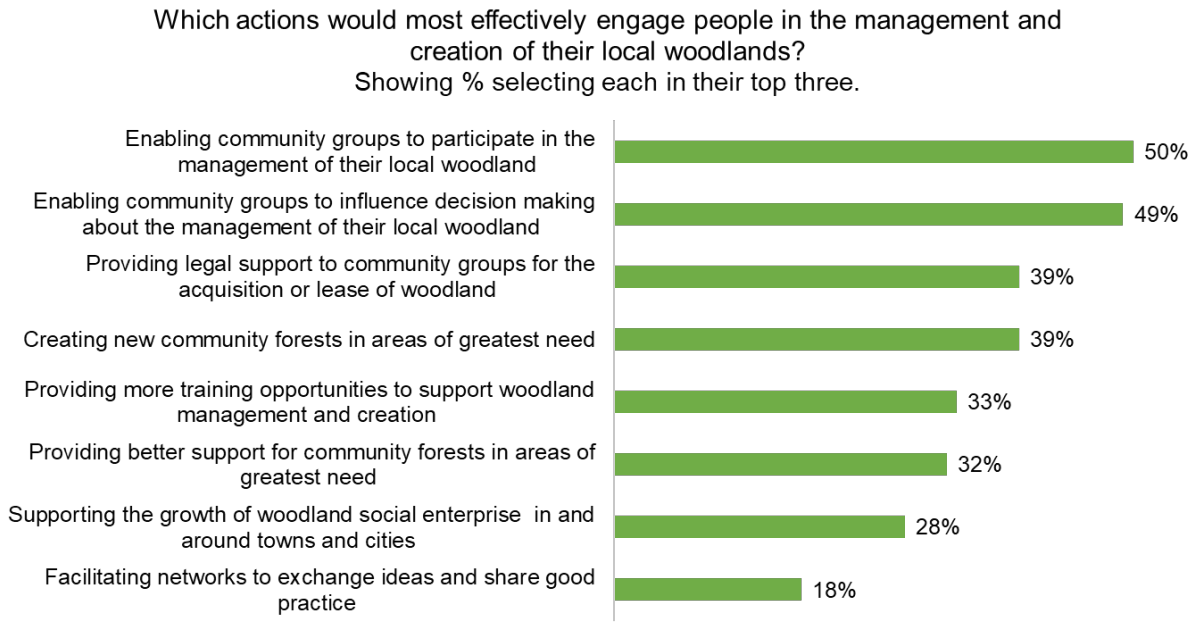

Figure 21: actions to engage people in the management and creation of their local woodlands (Q35). *Base: all responses to survey (n=1324 (Q35)). Source: ETS Consultation, June – September 2020*

Members of the public are particularly supportive of enabling community groups to influence decision-making about the management of their local woodland (selected by 60% of members of the public), enabling community groups to participate in the management of their local woodland (55%) and providing legal support to community groups (47%).

Foresters are particularly supportive of creating new community forests in areas of greatest need (55%) and providing better support for community forests in areas of greatest need (50%).

Environmental NGOs are particularly supportive of enabling community groups to influence decision-making about the management of local woodland (57%) and enabling community groups to participate in the management of local woodland (56%).

Facilitating public / community involvement in trees and woodland was one of the most recurrent themes of the substantive stakeholder responses – around a third mentioned this. It was also a common theme of the individual email responses – around one in six emails from individuals referred to the need to facilitate public or community involvement.

Substantive stakeholder responses tend to refer to this topic in the context of encouraging volunteers and community groups to "*care for their local trees long-term*" (in the words of one environmental NGO). One local authority says that there is "*an opportunity to connect with willing and active community groups to support them with initiatives to increase local tree planting.*"

Educating the public about the benefits of trees and woodland and the management of it was also widely considered important in the substantive stakeholder responses – around a quarter of these responses referred to this as a priority.

One in six substantive stakeholder responses referred to expanding or promoting community forests. Linked to the points highlighted above, community forests are seen as an excellent way of delivering public education and also engaging local communities on key issues. Specifically, community forests are often flagged as ways to reach a diverse audience and provide them with an understanding of important issues relating to trees and woodland:

> *"Creating new woodlands and Community Forests close to these communities through local Nature Recovery Networks will ensure that woods are connected with people who need them most, providing these communities with opportunities to exercise, learn, and engage with nature on their doorstep."* **Environmental NGO**

Addressing barriers to public access to trees and woodland

Q36: Which actions by government would be most effective in addressing barriers to peoples' access to trees and woodlands? *Total number of responses to question: 1335*

Creating new accessible woodlands in and around towns and cities is the most popular proposed action by government to address barriers to access to trees and woodlands. Three quarters of respondents (77%) selected this option in their top three priorities.

Around half of respondents (53%) selected offering more generous woodland management incentives for those woodlands with public access. Two in five (40%) selected supporting woodland access through existing incentives and rights of way as one of their top three priorities.

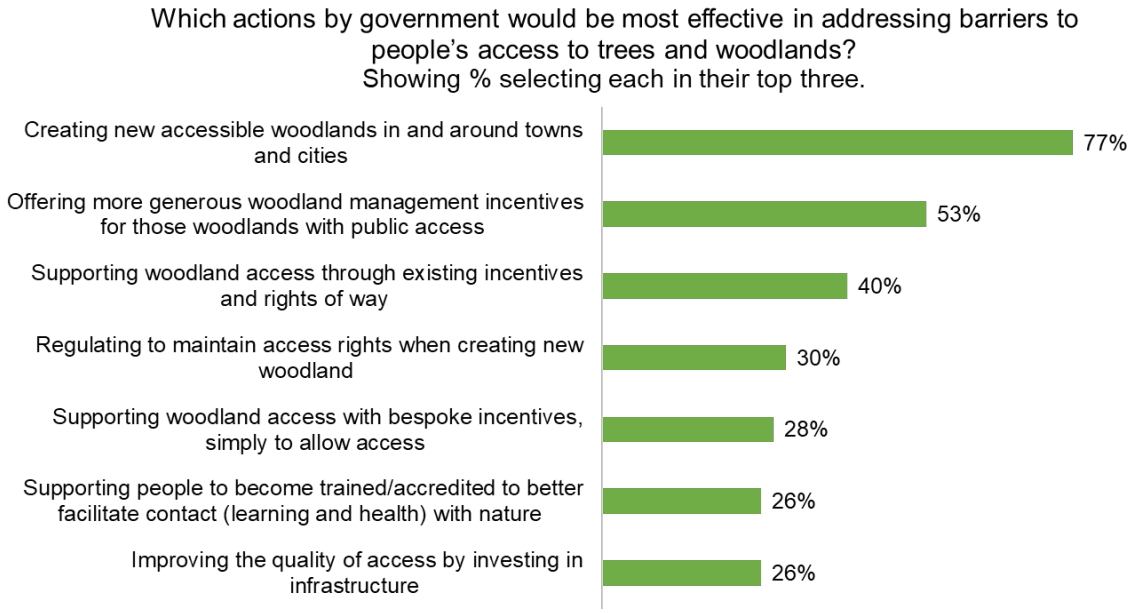

Figure 22: actions to address barriers to people's access to trees and woodlands (Q36).
Base: all responses to survey (n=1335 (Q36)). Source: ETS Consultation, June – September 2020

For foresters, offering more generous woodland management incentives for those woodlands with public access is a key priority. Seven in ten selected this as one of their top priorities, which is similar to the proportion who selected creating new accessible woodlands in and around towns and cities.

Environmental NGOs, members of the public and local authorities are particularly supportive of regulating to maintain access rights when creating new woodland (selected by 37%, 36% and 32% respectively).

Improving / maintaining public access to green spaces was mentioned in around three in ten substantive stakeholder responses. Numerous organisations highlight the valuable role of such green spaces during recent lockdowns, specifically in the context of the public's physical and mental health:

> *"The huge value of forests and woodlands to our physical and mental health was visibly demonstrated during the pandemic"* **Other stakeholder**.

In the substantive stakeholder responses, some organisations highlight the importance of considering public access issues in relation to new tree planting – and outline requirements for ensuring that rights of way are preserved, as in the comment below:

> *"New woodland should be dedicated as access land under section 16 of the Countryside and Rights of Way Act 2000, giving the public the right to walk there and, where appropriate to ride and cycle."* **Environmental NGO**

Consistent with other areas of the consultation, some environmental NGOs say that targets should be set for public access to trees and woodland as part of an action plan for trees, woodland and forestry.

Most valued aspects of trees and woodland

Q37: Which of the following do you most value about trees and woodland? *Total number of responses to question: 1453*

Trees and woodland are most valued as places for nature. Around two thirds of respondents (64%) selected this as one of the top two aspects of trees and woodlands that they most value. Around a third (36%) selected "places to exercise and relax and engage with nature". Three in ten (28%) selected "a resource that stores carbon".

For foresters, the most valuable aspects of trees and woodland are different. Seven in ten (71%) selected "a source of sustainable products and employment". "Places for nature" is the second most widely selected value – chosen by 45% of foresters.

For land-owners, the top two most valued aspects are “places for nature” (selected by 60%) and “a resource that stores carbon” (39%). For local authorities, the top two are “places for nature” (43%) and “as part of urban green space” (27%).

Figure 23: most valued aspect of trees and woodland (Q37). *Base: all responses to survey (n=1453 (Q37)). Source: ETS Consultation, June – September 2020*

Around one in six of all respondents (14%) wrote in an “other” response as what they most value about trees woodland. Key themes among these open-text responses are:

- Environmental benefits (12% of all respondents wrote an open-text response which fell under this theme)
- Mental health / wellbeing benefits (7%)
- Natural beauty (3%)

Addressing the funding challenge for planting and maintenance of trees in urban areas

Q38: Which of these actions would best address the funding challenge for the planting and on-going maintenance of trees in urban areas? *Total number of responses to question: 1335*

Using planning levers to require developers to plant trees relating to new development on streets and urban spaces is the most popular action for addressing the funding challenge of planting and maintaining trees in urban areas. Three quarters of consultation respondents (76%) selected this in their top two actions. This figure is particularly high among foresters – more than four in five foresters (83%) selected this.

Two in five consultation respondents (42%) selected “using planning levers to raise funds for on-going maintenance” in their top two. This figure is particularly high among local authorities, foresters and land-owners (53%, 53% and 51% respectively).

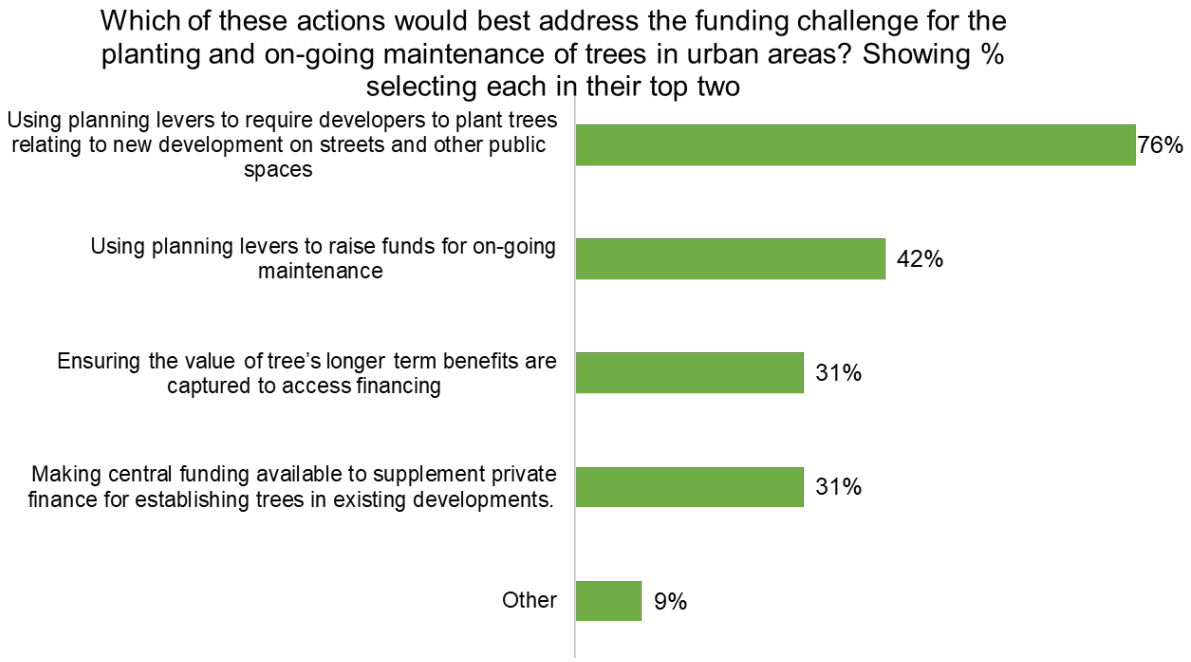

Figure 24: actions to address the funding challenge for the planting and ongoing maintenance of trees in urban areas (Q38). *Base: all responses to survey (n=1335 (Q38)). Source: ETS Consultation, June – September 2020*

Around one in ten (9%) wrote in an “other” response at this question. The key themes of these are providing funding or support to local authorities (5% of all responses included comments on this theme) and introducing new rules for developers (5%):

> *“Resources to Local Authorities for publicly owned trees commensurate with and appropriate to the quality, value and quantity of the tree resource.”* **Environmental NGO**

> *“Require developers to fund tree planting on new developments.”* **Other stakeholder**

4. Supporting the economy

In this section, we have outlined the responses to the fourth pillar of the consultation: supporting the economy.

Key themes

Promoting the woodland sector

Many think that there are urgent workforce shortages across the sector. Around a quarter of substantive stakeholder responses refer to a need to promote woodland-related careers. There is widespread support for changing planning requirements and amending public procurement standards to encourage the use of timber in construction.

Promoting agroforestry

Respondents agree that providing incentives for a wider range of tree planting on farms would be the most effective step to increase tree planting on farms. Providing better advice and guidance on how woodland creation / management can contribute to farm business models is also widely supported.

Promoting agroforestry is generally considered an important priority. However, there are differing views on the best means of supporting tree establishment for agroforestry. On balance, there is a preference for adjusting policy so that agroforestry and energy forestry crops are not a permanent land use change. There is widespread consensus that providing industry-led guidance on how tenants and landlords can collaborate for mutual benefit would be an effective step to increasing agroforestry on tenanted farmland.

Providing clarity on energy forestry

Energy forestry polarises opinion. Those in favour want the regulatory position for energy forestry to be clarified, alongside better advice for those engaged in it and more support to develop a secure supply chain. Providing financial support for the capital costs of energy forestry is most frequently considered likely to increase the uptake of energy forestry. Opponents, particularly environmental NGOs, argue that promotion of energy forestry is counter to the government's goals on climate change, as well the other aims of an action plan on trees, woodland and forestry.

Encouraging the use of timber in construction

Q39: What could the England Tree Strategy do to encourage the use of timber in construction? *Total number of responses to question: 1327*

Encouraging planning requirements to incorporate sustainable materials is most widely considered an effective step to encourage the use of timber in construction – amending public procurement standards and promoting necessary skills are also considered valuable steps to take.

Around half of consultation respondents (52%) selected “encouraging planning requirements to incorporate sustainable materials” in their top two priorities to encourage the use of timber in construction. This is particularly popular among local authorities (60% of local authority respondents selected this) and members of the public (57%).

Around a third of respondents selected “amending public procurement standards to support Grown in Britain certified forest products, incorporate sustainable materials and signal long-term demand” (37%) and “improving, encouraging or incentivising the growth of necessary skills such as those in green construction, design or forestry” (34%).

There is no standout priority among foresters – instead they are relatively evenly split across three priorities:

- Amending public procurement standards to support Grown in Britain certified forest products, incorporate sustainable materials and signal long-term demand (41% selected this in their top two)
- Encouraging planning requirements to incorporate sustainable materials (40%)
- Supporting new innovations in developing timber building materials such as cross laminated timber (38%)

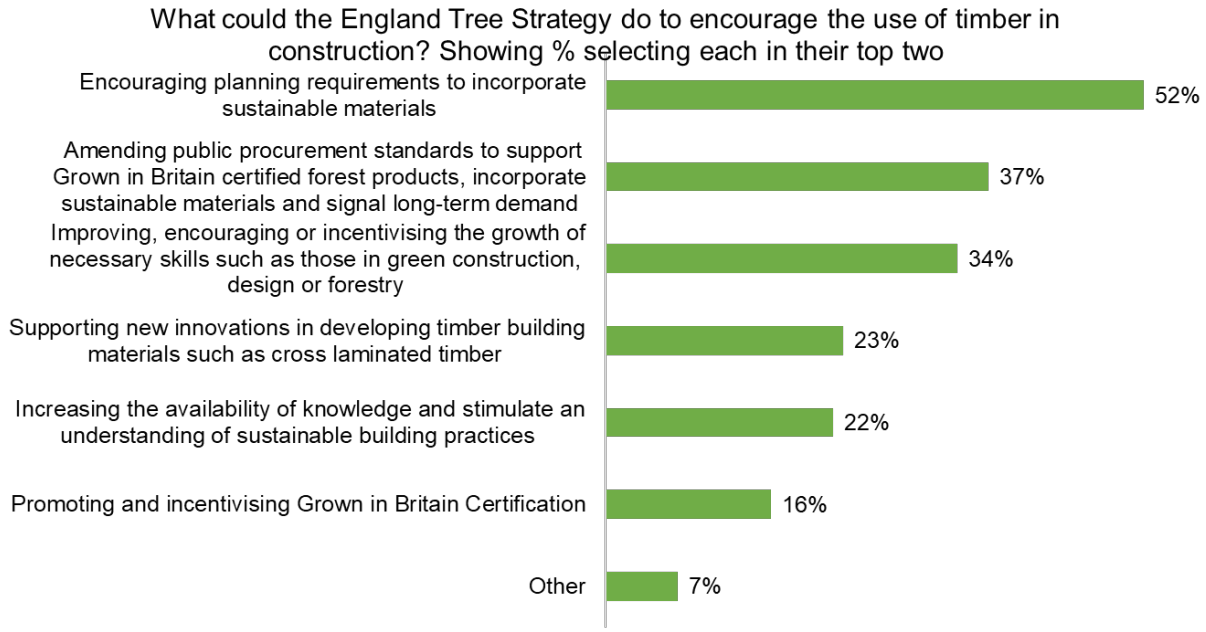

Figure 25: encouraging the use of timber in construction (Q39). *Base: all responses to survey (n=1327 (Q39)). Source: ETS Consultation, June – September 2020*

Approximately one in twenty respondents to the consultation (7%) chose “other” as one of their top two priorities. In their open-text responses, key themes include:

- Changing planning laws / process – 3% wrote responses which fell under this theme.
- Promoting industry standards – e.g. FSC kitemarks (2%). Some responses on this topic argued that Grown in Britain should not be a desirable trademark – instead, respondents argued that the strategy should promote responsible forest management through FSC / PEFC certification.
- Promoting and ensuring safe construction materials – e.g. fire safe cladding and timber, working with insurance companies (2%)
- Identifying and promoting species / timber types that thrive in England (2%)
- Educating stakeholders, investors and planners about sustainable timber (2%)

"Legislate for planning requirements to incorporate sustainable materials." **Environmental NGO**

"Promoting FSC certification of responsible forest management, rather than focusing on the provenance claims of Grown in Britain, and supporting the reinstatement of CPET." **Other stakeholder**

Around a fifth of all substantive stakeholder responses refer to the need to support the timber industry as a priority. These comments partly relate to the potential for the UK timber industry to aid economic growth, and some specifically highlight the potential for the industry to support a "Green Recovery" from the COVID-19 crisis.

Specifically, many respondents want the government to provide certainty for the domestic timber market – with adjustment of its own procurement standards often cited as a first step to boosting the industry:

> *"Government should over the long term, promote & encourage use of domestic wood in construction, manufacturing and public procurement. Send clear and sustained signals to grow market confidence."* **Land-owner**

Views on the role of timber in carbon sequestration are mixed. Some say that long-term use in construction is beneficial, while others (particularly environmental NGOs) say that timber grown for this purpose is of limited benefit. Some suggest that supporting the UK timber industry is preferable to importing wood from other countries, where there may be greater environmental and ethical concerns:

> *"The UK must produce more domestic timber to reduce pressure on an over-stretched global supply chain, resulting in illegal logging and exploitation of intact forest habitats."* **Other stakeholder**

Supporting tree establishment for agroforestry or energy crops

Q40: How could policy about the permanency of woodlands better support tree establishment for agroforestry or energy crops? *Total number of responses to question: 1625*

Views on supporting agroforestry or energy crops are mixed, with no clear consensus among respondents to the consultation. On balance, there is a preference for adjusting policy so that energy forestry crops are not a permanent land use change – but the proportion of respondents who prefer this is matched by the proportion who are “not sure”.

Around a quarter of respondents (23%) selected “adjusting policy so energy forestry crops are not permanent land use change” – the same proportion selected “not sure” in response to this question. Around one in five (18%) selected “changing policy so it does not treat afforestation as a permanent land use change”. Around one in six (15%) selected “retaining the current position whereby afforestation is generally a permanent land use change”.

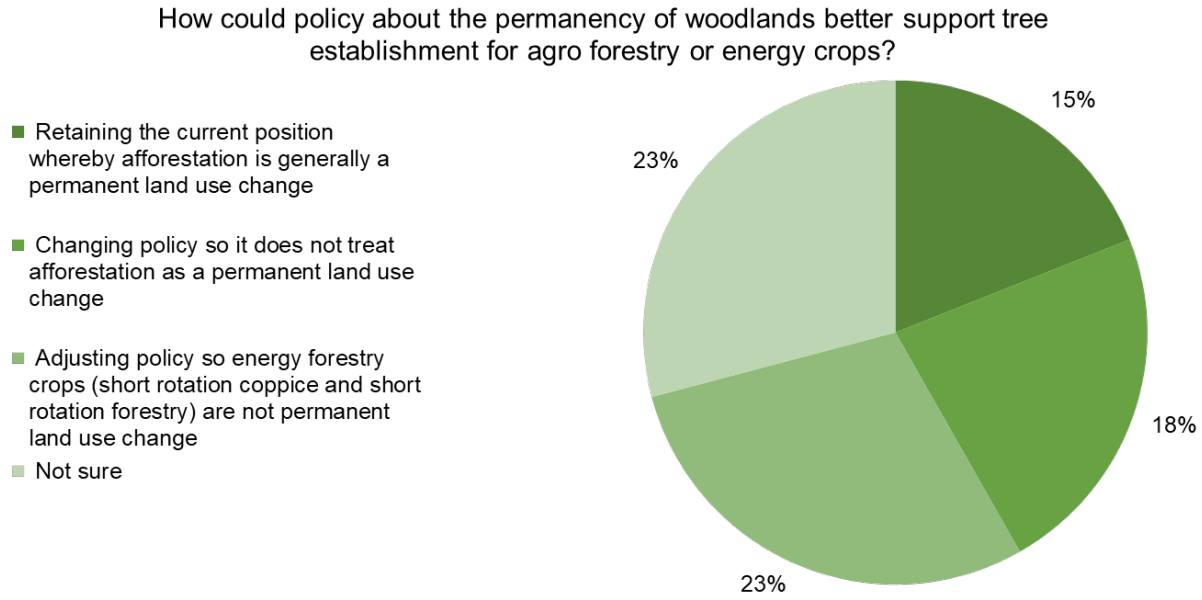

Figure 26: supporting tree establishment for agroforestry or energy crops through policy about the permanency of woodlands (Q40). *Base: all responses to survey (n=1625 (Q40)). Source: ETS Consultation, June – September 2020*

Foresters are more likely than many of the other audiences to prioritise adjusting policy so that energy forestry crops are not a permanent land use change – 36% of foresters selected this option, compared to 23% of all respondents.

However, foresters are also more likely to have an opinion on this topic than all other audiences – with the full breakdown of responses for foresters given below:

- Adjusting so energy forestry crops not permanent land use change: 36%
- Changing so afforestation not a permanent land use change: 26%
- Retaining current position: 21%
- Not sure: 8%

Among other categories of respondent, responses are largely in line with the overall trend outlined above. Members of the public are particularly likely to say that they are “not sure” (28% selected this).

Promoting agroforestry is widely considered important in the substantive stakeholder responses – three in ten of these responses refer to this as a priority. Many respondents argue that agroforestry offers a valuable way to increase tree coverage, "*combining support for economic benefits with the delivery of multiple environmental outputs"* in the words of one environmental NGO. In addition, some organisations highlight the opportunities that agroforestry would present for the public's connection with nature.

To boost agroforestry, substantive stakeholder responses highlight the need for greater flexibility on permanent land use change. Some argue that allowing the option for land owners and farmers to try agroforestry without a permanent land use change "*could facilitate tree planting by tenants on let land if the landowner knew the land could be farmed again in future if need be*" (these are the comments of an association). These respondents say that agroforestry and new woodland below a certain area threshold could be exempt from 'permanence' requirements.

In addition to issues around land use change, other stakeholder organisations flagged the importance of education and training on agroforestry for land-owners and farmers.

Increasing the uptake of energy forestry

Q41: Which actions would best increase the uptake of energy forestry? *Total number of responses to question: 1175*

Providing financial support for the capital costs of energy forestry is most frequently considered likely to increase the uptake of energy forestry. Clarifying the regulatory position for energy forestry, providing better advice on energy forestry and providing support to develop a secure supply chain are also fairly widely supported.

Around a third of respondents (34%) selected "providing financial support for the capital costs of energy forestry". Around three in ten selected "clarifying the regulatory position for energy forestry" (30%), "providing better advice and guidance on energy forestry" (28%) and "providing support to develop a secure supply chain" (27%).

Foresters are particularly likely to see clarifying the regulatory position for energy forestry as a priority and 40% of foresters selected this as one of their top priorities, compared to 30% of all respondents.

Local authorities are particularly likely to consider providing financial support for the capital costs of energy forestry and providing support to develop a secure supply chain as a priority – around half selected each of these in their top two priorities (51% and 48% respectively).

For land-owners, the top three priorities are clarifying the regulatory position for energy forestry (selected by 37%), clarifying the taxation of energy forestry (32%) and providing financial support for the capital costs of energy forestry (32%).

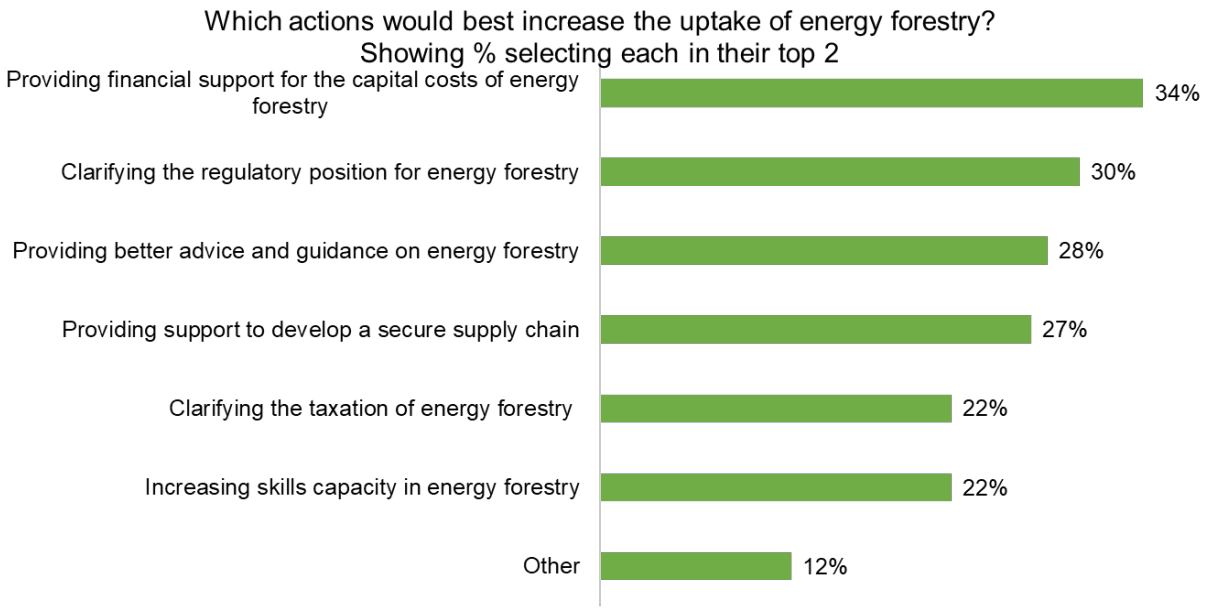

Figure 27: actions to increase the uptake of energy forestry (Q41). *Base: all responses to survey (n=1175 (Q41)). Source: ETS Consultation, June – September 2020*

Approximately one in ten respondents to the consultation (12%) chose "other" as one of their top two priorities. A central theme of these open-text responses is opposition to energy forestry, particularly among environmental NGOs. Three in ten environmental NGOs (29%) wrote responses which fell under this theme, a similar proportion to the most widely selected option among environmental NGOs – providing support to develop a secure supply chain, selected by 31% of environmental NGOs.

Among the substantive stakeholder responses, a small minority (fewer than 1 in 20) said that they do not support energy forestry. These were primarily environmental NGOs – who repeatedly raised concerns about the impact of energy forestry on biodiversity and argued that energy forestry is "*not compatible with limiting global warming and must be ruled out.*"

Increasing the planting of trees on farms

Q42: Which actions would best increase the planting of more trees on farms? *Total number of responses to question: 1362*

There is consensus that providing incentives for a wider range of tree planting on farms would be the most effective step. Providing better advice and guidance on how woodland creation / management can contribute to farm business models is also supported.

Around two thirds of consultation respondents (64%) selected "providing incentives for a wider range of tree planting on farms" as one of their top two priorities. This is a particularly popular option among local authorities (74% selected this) and members of the public (69%).

Two in five (38%) selected “providing better advice and guidance on how woodland creation / management can contribute to farm business models”. A quarter (25%) selected “funding for the advice and the design of schemes for trees on farms and agroforestry”. One in five (20%) selected “providing better advice and guidance on woodland creation and management.”

Among most stakeholder types, the most popular options reflect the overall trend. Among land-owners, however, “clarifying the implications for the land holding’s tax status of planting more trees” is particularly important. A quarter (24%) selected this, making it the third most widely selected option for this audience behind providing incentives for a wider range of tree planting on farms (59%) and providing better advice and guidance on how woodland creation and management can contribute to farm business models (28%).

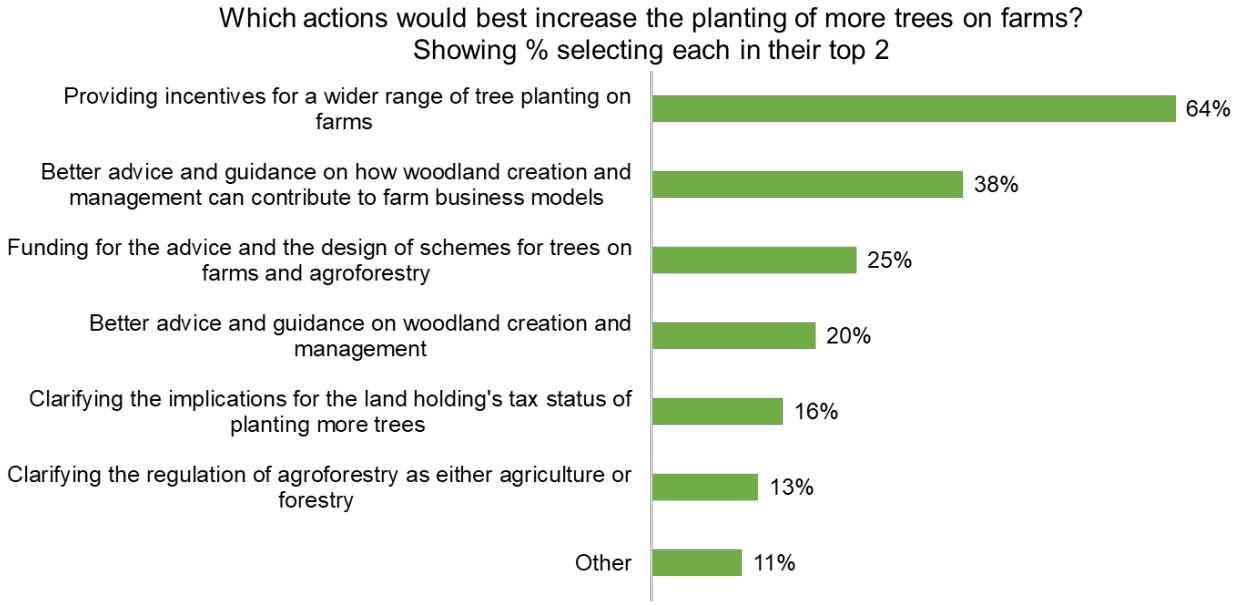

Figure 28: actions to increase the planting of trees on farms (Q42). *Base: all responses to survey (n=1362 (Q42)). Source: ETS Consultation, June – September 2020*

Approximately one in ten respondents to the consultation (11%) chose “other” as one of their top two priorities for increasing tree planting on farms. A strong theme of these open-text responses is providing financial incentives to farms / small land-owners to plant trees – e.g. for small-scale woodland on farms – 7% of respondents wrote in responses which fell under this theme.

> *“As part of any grant scheme given to farmers there must be a requirement to have permanent set aside woodland. With smaller farms this should be compensated for.”* **Land-owner**

Other, more minor themes of the open-text responses are:

- Promoting agroforestry (3% wrote responses which fell under this theme)
- Promoting natural regeneration / rewilding (2%)
- Educating farmers / land managers (2%)

- Introducing laws / requirements for farmers to plant trees and hedgerows (2%)
- Providing advice / support for land-owners (2%)

Agroforestry, woodland creation and management on tenanted farmland

Q43: Which actions would best increase agroforestry, woodland creation and management on tenanted farmland? *Total number of responses to question: 1152*

There is agreement that providing industry-led guidance on collaboration for mutual benefit would be an effective step to increase agroforestry, woodland creation and management on tenanted farmland. Reviewing how tenancy agreements approach the responsibility for and rights to trees is also widely supported.

Around three in five consultation respondents (63%) selected “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” in their top two priorities.

Around half (46%) selected “reviewing how tenancy agreements approach the responsibility for and rights to trees”.

Around a third selected “confirming the property rights to long-term carbon benefits” (33%) and “providing eligibility criteria for tree establishment grant agreements to discourage the proactive resumption of tenanted farmland” (30%).

The overall trend is broadly reflected among each of the various stakeholder categories. Local authorities, environmental NGOs and foresters are particularly likely to see providing industry-led guidance on collaboration for mutual benefit as a priority. Around seven in ten of each audience (72%, 71% and 70% respectively) selected this as one of their top priorities, compared to three in five of all respondents.

For foresters, providing eligibility criteria for tree establishment grant agreements to discourage the proactive resumption of tenanted farmland displaces confirming the property rights to long-term carbon benefits as the third most popular option (31% vs 17%). Among members of the public, similar proportions selected each option (36%).

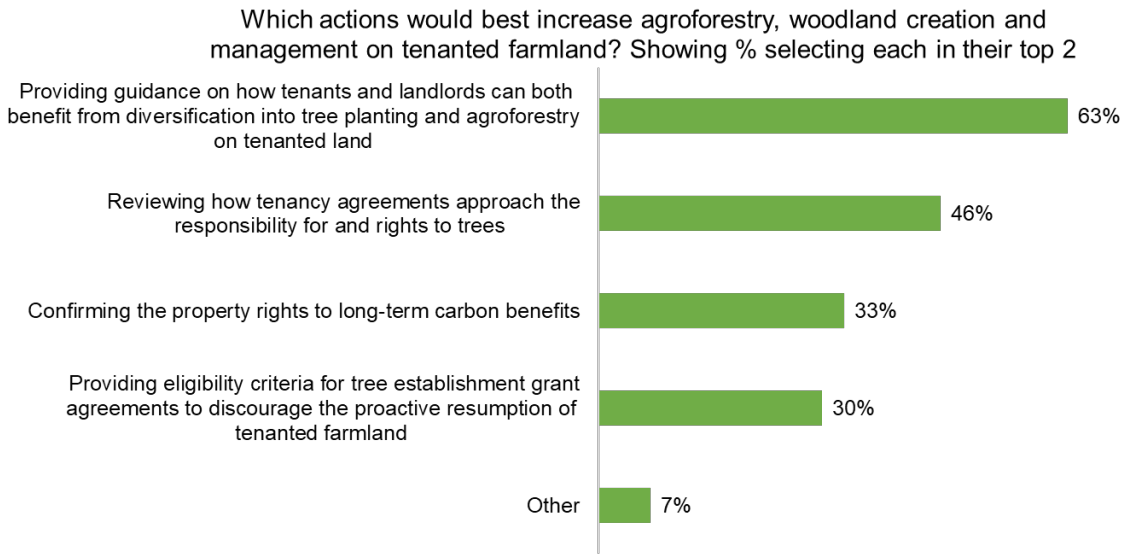

Figure 29: actions to increase agroforestry, woodland creation and management on tenanted farmland (Q43). *Base: all responses to survey (n=1152 (Q43)). Source: ETS Consultation, June – September 2020*

Around one in twenty consultation respondents chose to write an "other" response in their top two priorities. There are few consistent themes among these open-text responses – the only consistent themes are:

- Incentivising planting / maintaining trees and woodland management (through tax incentives or grants) – 3% of all responses fall under this theme
- Reviewing tenancy law – 2%.

Shortages in workforce capacity for woodland

Q44: What are the most urgent shortages in the workforce capacity needed to increase woodland creation, maintenance and management? *Total number of responses to question: 1132*

Consultation respondents tend to say that the workforce capacity for woodland creation, maintenance and management has urgent shortages in all of the fields given.

Around half of consultation respondents (47%) selected "all of the above" in response to this question. Local authorities (55%) and members of the public (51%) are particularly likely to selected "all of the above", compared to 42% of land-owners and 37% of foresters.

The next most frequently selected options are professional forester (17%), forestry educators (16%), tree planter (15%) and land agents, surveyors and specialist architects with specialist forest knowledge (14%). Land-owners, farmers and foresters are particularly likely to see professional foresters and tree planters as the most urgent shortages. Around one in five selected each as the most urgent shortages.

Local authorities are particularly likely to selected land agents, surveyors and specialist architects with specialist forest knowledge as the most urgent shortages. Around one in five (20%) selected this.

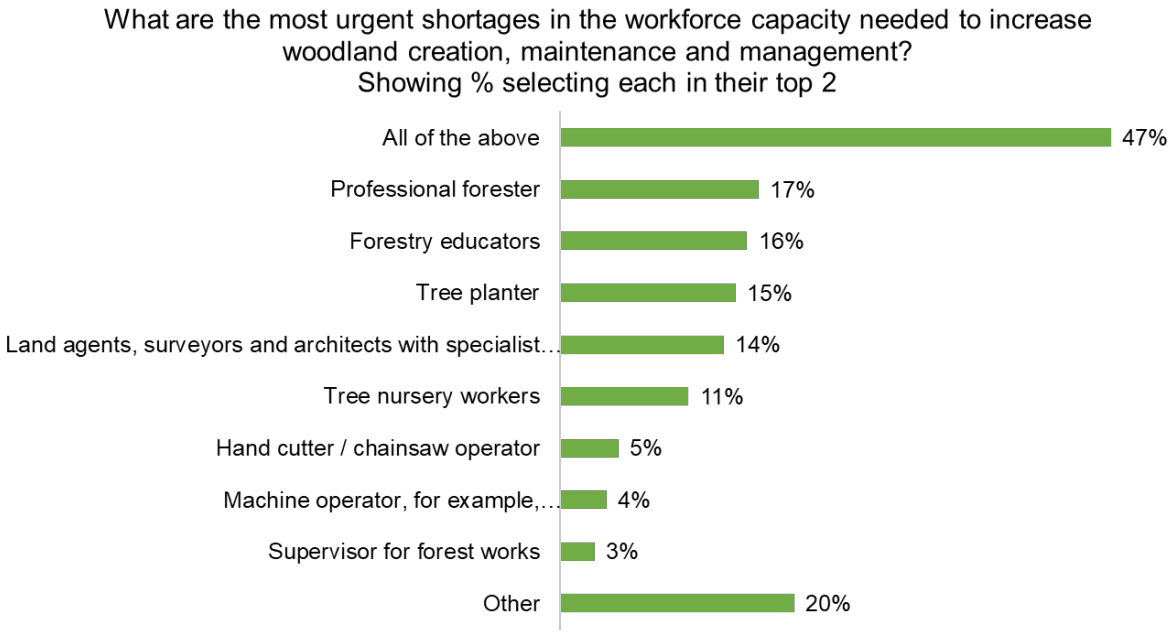

Figure 30: the most urgent shortages in the workforce capacity needed to increase woodland creation, maintenance and management (Q44). *Base: all responses to survey (n=1132 (Q44)). Source: ETS Consultation, June – September 2020*

Around one in five respondents wrote in the open-ended "other" responses as one of their top two most urgent shortages. The most prominent theme among these responses is the need for ecologists and conservationists – around 6% of responses relate to this topic.

> *"Ecologists to properly map existing habitats and input into decisions about increasing tree coverage, ensuring the right tree in the right place and biodiversity enhancements."* **Environmental NGO**

Other themes from among the open-ended responses are:

- Generalist woodland workers (3% of responses relate to this)
- Experts in woodland management (3%)
- Government tree officers (2%)

Promoting woodland-related careers also emerged as a key theme in the substantive stakeholder responses – with a quarter of these responses referring to this as a priority. In part, this is because promotion of these careers is considered essential to delivery of an action plan for trees, woodland and forestry. Respondents argue that, without investment in the workforce, the goals of the action plan will remain unfulfilled: for example, one land-owner says that "*the scale of the task involved in meeting government tree planting targets and bringing our woodlands back into management is so great that there is a need to expand skills in every part of the sector and supply chain."*

Many substantive stakeholder responses also highlight the benefits of such an action plan in terms of generating jobs and supporting economic growth, particularly in the context of the economic recovery from COVID-19. Some say that the initial costs of investing in the sector will be outweighed by the long-term savings – for example, one environmental NGO argues that "*the multiple benefits of natural forests and woodlands in terms of carbon drawdown and storage, flood mitigation, improved soil and water quality and habitat for wild species, far outweigh the upfront costs.*"

Specifically, foresters, land-owners and environmental NGOs emphasise a perceived need to focus on long-term promotion of forestry careers through the education system. One environmental NGO, for example, argues that the government should *"make land-based careers more visible and attractive […] widening the offer for both technical and academic qualifications, to grow the next generation of professional tree people."*

Strengthening productivity in forestry supply chains

Q45: Which actions would best strengthen productivity in forestry supply chains?
Total number of responses to question: 1108

There is no clear view on the best ways to strengthen productivity in forestry supply chains. Developing options for private investment for ecosystem services that drive woodland management, widening grant support, facilitating collaborative working between woodland owners and training are all widely considered priorities.

About 46% of respondents selected developing options for private investment for ecosystem services that drive woodland management in their top three priorities.

Around two in five selected each of the following in their top three priorities:

- Providing grant support for a wider range of management options (40%)
- Facilitating collaborative working between woodland owners (40%)
- Training to increase the skills capacity in agricultural workers (39%)
- Providing support for productivity / supply chains for woodland products (39%)

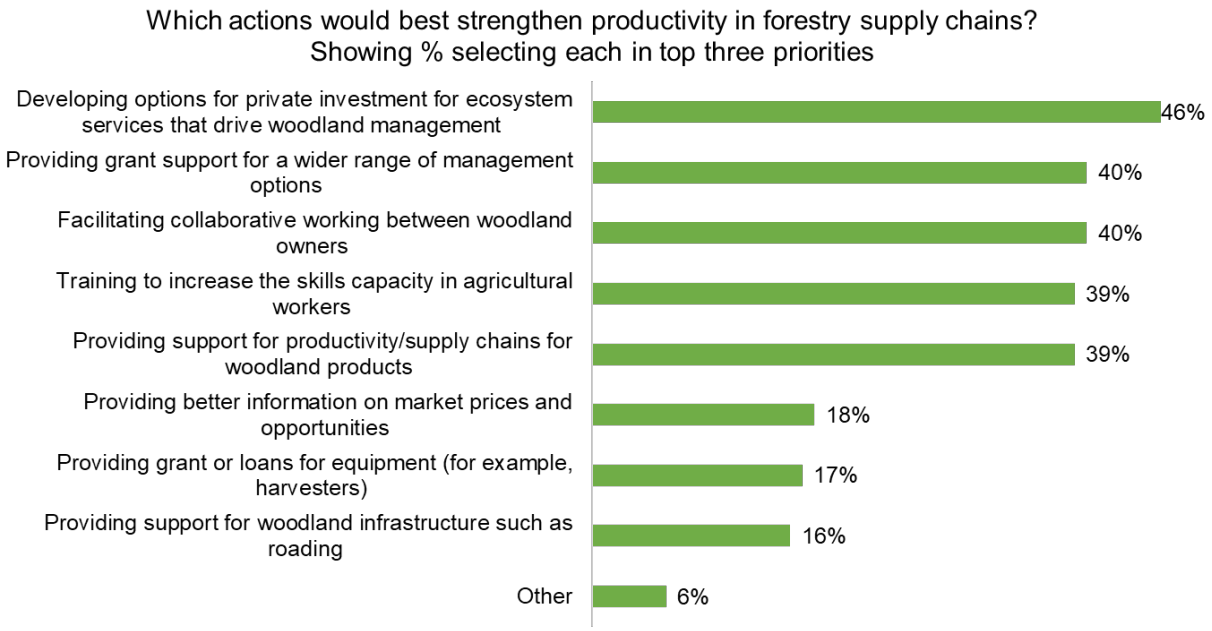

Figure 31: actions to strengthen productivity in forestry supply chains (Q45). *Base: all responses to survey (n=1108 (Q45)). Source: ETS Consultation, June – September 2020*

There is significant variation between stakeholder types in responses to this question. Foresters are particularly likely to see providing support for woodland infrastructure such as roading as a priority. Foresters' key priorities are:

- Providing grant support for a wider range of management options (selected by 51% in top three)
- Providing support for woodland infrastructure such as roading (47%)
- Developing options for private investment for ecosystem services that drive woodland management (44%)

For land-owners, the top three priorities are:

- Providing grant support for a wider range of management options (selected by 51% in top three)
- Facilitating collaborative working between woodland owners (39%)
- Developing options for private investment for ecosystem services that drive woodland management (35%)

For environmental NGOs, the top three priorities are:

- Facilitating collaborative working between woodland owners (selected by 56% in top three)
- Providing grant support for a wider range of management options (48%)
- Developing options for private investment for ecosystem services that drive woodland management (45%)

And for members of the public, the top three priorities are:

- Training to increase the skills capacity in agricultural workers (selected by 48% in top three)
- Developing options for private investment for ecosystem services that drive woodland management (44%)
- Facilitating collaborative working between woodland owners (44%)

Additional theme from the substantive responses

Promoting agro-tourism

Around one in ten substantive stakeholder responses highlighted promoting agro-tourism or eco-tourism as a priority. These responses argue that promoting tourism in this way makes woodland and forests more economically viable – and brings associated benefits such as job creation alongside the broader environmental benefits of the action plan.

5. Additional themes from substantive and individual responses

A small number of additional themes were prominent among the free-form substantive and individual email responses to the consultation, but do not fit neatly into any of the four pillars of the consultation. These are included here.

Setting targets

There is a broadly positive response to the England Tree Strategy (ETS) consultation among the substantive responses, with around two in five explicitly supporting the development of an action plan for trees, woodland and forestry and only a very small proportion expressing significant reservations or lack of support. However, around one in five would like to see an action plan for trees, woodland and forestry being more ambitious. This sentiment is echoed among individual email responses to the consultation – around a third of these individual email responses highlight a perceived need for more ambition.

Specifically (and consistent with the letter writing campaigns related to the consultation), a common theme of the free-form responses to the consultation is the role of targets. Around two in five individual email responses and a third of substantive stakeholder responses refer to the importance of this.

For some (particularly environmental NGOs), the primary aim here is to ensure that progress is trackable – arguing that an action plan for trees, woodland and forestry should include "*an evaluation framework demonstrating how progress will be measured and communicated, and how any problems identified will be addressed in future iterations of the strategy*" (this comment from an association reflects a common theme of responses).

Others argue that targets will create ambition and purpose on the part of those responsible for delivering an action plan for trees, woodland and forestry, as well as clarity on the goals of the action plan. One environmental NGO says that they *"do not believe that a strategy can really be effective without targets*." Typically, respondents argue that targets should not focus on the number of trees planted. The quality of woodland habitats created, as well as the scale, is frequently mentioned in this context. Potential areas for targets to be set that are mentioned include (but are not limited to):

- Woodland cover
- Status of ancient woodland
- Agroforestry uptake
- Ecological condition of native and ancient woodland, including:
  - Proportion of trees reaching maturity
  - Proportion of trees lost to disease

Alignment with other policies and strategies

Around two in five substantive stakeholder responses highlight the perceived need to link an action plan for trees, woodland and forestry with other key policies and strategies such as the new Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery Schemes and the 25 Year Environment Plan.

Some comments argue that this is good practice – ensuring policies are aligned and work in tandem is seen as essential to ensuring that an action plan for trees, woodland and forestry delivers to its full potential. Specifically, the need to coordinate effectively with the new Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery Schemes is frequently commented upon. The forthcoming action plan for peat is also repeatedly mentioned. Around one in ten substantive stakeholder responses to the consultation refer to supporting peatland restoration. The Flood and Coastal Erosion Risk Management strategy is also highlighted in the context of riparian planting.

> *"The strategy should align closely with the Nature for Climate Fund, the new Environmental Land Management Scheme, and the Nature Recovery Network to ensure all existing and new woodland and trees deliver the maximum benefit for carbon, nature and people."* **Environmental NGO**

Other comments, however, refer to perceived contradictions in Government policy and highlight the potential for counterproductive activity. Specifically, numerous stakeholder organisations refer to a perceived tension between an action plan for trees, woodland and forestry and the Government's recent announcements on planning policy. The comment from one stakeholder (from the "other stakeholder" category) that *"the Planning White Paper could seriously undermine proposals for increasing woodland creation as well as enabling loss of existing woodland cover"* reflects a common theme across the responses.

6. Letter writing campaigns

During the England Tree Strategy (ETS) consultation period, Defra received responses linked closely to three prominent letter writing campaigns from environmental non-governmental organisations (NGOs), who encouraged their members and supporters to submit responses to the ETS consultation mailbox using a template or suggested wording.

To aid analysis, we have separated the responses linked to these campaigns from the rest of the responses received. This section summarises the responses associated with these letter writing campaigns.

Friends of the Earth

Defra received 16,590 emails linked to the Friends of the Earth campaign. These were structured to follow a template format, either exactly or very closely. Responses linked to the campaign typically made three key demands in relation to an action plan for trees, woodland and forestry.

1. Target setting

In line with many of the environmental NGOs' responses to the consultation, responses argued for the need to set a target – in this case, specifically in relation to doubling tree cover. The main reason given for doing this is to aid absorption of the UK's greenhouse gas emissions:

> *"Doubling woodland cover across the UK could help absorb 10% of the UK's current greenhouse gas emissions annually – some 47MtCO2e. Friends of the Earth's spatial modelling shows there is more than enough suitable land to double tree cover in England, without impacting on peat, other precious habitats or valuable farmland."* **Template response / numerous responses**

Letters argued that there is already strong public support for this – with more than 165,000 signatories of Friends of the Earth's petition to double tree cover. They also highlighted that numerous organisations have pledged to double tree cover:

> *"There's strong public support for doing so – over 165,000 people have signed Friends of the Earth's petition to double tree cover. Furthermore, there are already other organisations stepping up to the mark to show the way: 9 councils in England have now pledged to double tree cover, whilst the National Trust has committed to increasing woodland cover on its own huge estates from 10% currently to 17% by 2030 – far faster than planned government woodland creation rates."* **Template response / numerous responses**

2. Financial support

Responses linked to this campaign argued that the Government needs to raise the level of financial support to help meet the target given above. Specifically, the Friends of the Earth campaign said that funding of £500m per year is necessary.

> *"UK governments are currently spending less than £1 per person per year on trees – a pitifully low amount. To double tree cover, the Government needs to raise that level to around £10 per person, or a total of £500m per year. This cost-effective investment will help restart the economy by creating new jobs in forestry, tourism and ecosystem restoration."* **Template response / / numerous responses**

3. Supporting a diverse range of activities

The Friends of the Earth campaign responses argued that numerous solutions are needed to deliver a doubling of tree coverage in England. Specifically, the campaign argued for more native broadleaved woodland, sustainable commercial forestry, agroforestry and natural regeneration.

> *"There is no single 'silver bullet' approach. For example, England needs much more native broadleaved woodland – and it also needs more sustainable, sensitively-sited commercial forestry to replace some of the vast amounts of wood we import (some of which is driving deforestation in other countries).*
>
> *The government must do much more to financially support natural regeneration (the self-seeding of trees – current grants are geared towards just supporting tree-planting) as well as agroforestry (where trees are integrated into farmed landscapes, from restored orchards to shelter belts and wider hedgerows)."* **Template response / numerous responses**

Woodland Trust

Defra received 1,962 emails linked to a campaign run by the Woodland Trust. Responses were structured around the four pillars of the consultation. Responses included a series of key messages, although the exact formulation of these varied and emails included free-form text from individual respondents.

Under section one ("expanding and connecting our trees and woodland"), responses focussed on three core demands:

- Respondents argued that the strategy should include a target of 18,000 ha of new native tree cover as part of a total increase in tree coverage of 30,000 ha by 2025.
- They also stated that most new tree coverage should be from native varieties.
- They argued that the strategy should support natural regeneration and targets for trees and hedges in urban areas.

Under section two ("protecting and improving our trees and woodlands"), the Woodland Trust campaigners made two demands:

- Setting a target of at least 75% of native woods being in either good or improving condition by 2030 (compared to a current level of 10%).
- Setting a new "ambitious" target for restoring ancient woodland destroyed by plantation forestry.

Under section three ("engaging people with trees and woodland"), the campaign argued for a mandatory requirement on all local authorities to have their own local tree strategy.

Under section four ("supporting the economy"), the campaign argued for ensuring that all publicly funded trees are grown and sourced from the UK and Ireland.

Rewilding Britain

The consultation also received 224 responses from the Rewilding Britain campaign. The emails typically either followed a set template or referred to "supporting the Rewilding Britain campaign". Some included additional free-form content – however, almost all responses referred to a series of core messages. The campaign made three demands of an action plan for trees, woodland and forestry:

- Double woodland cover to at least 26% by 2030 for the benefit of people, nature and climate.
- Support natural regeneration as the default approach
- Raise and integrate investment in woodland regeneration from public and private financing

Woodland cover

The main argument made in favour of doubling woodland coverage in the UK was the potential to aid greenhouse gas absorption. Consistent with the Friends of the Earth campaign, the Rewilding Britain campaign argued that woodland coverage could be doubled without adversely affecting peat, other precious habitats or valuable farmland.

> *"Doubling UK woodland cover from the current 13% to 26% could help absorb 10% of the UK's current greenhouse gas emissions. […] We know we have more than enough suitable land to double tree cover in England, without impacting peat, other precious habitats or valuable farmland."* **Numerous responses**

Responses linked to the Rewilding Britain campaign argued that there is strong public support for supporting natural regeneration and wanted an action plan for trees, woodland and forestry to provide financial and technical support to achieve a doubling of tree coverage by 2030.

> *"There's also strong public support for the role of rewilding and nature's restoration – particularly within the current context of a green recovery. We are therefore calling*

for the England Tree Strategy to reflect this by providing financial and technical support for a doubling of woodland cover by 2030, including the area of land where young woodlands are regenerating and growing into the forests and wildwoods of the future." **Numerous responses**

Natural regeneration

The campaign responses argued that natural and assisted regeneration, together with the planting of native tree species, will be a more effective approach to reforestation than manual tree planting. Responses gave a series of reasons why this was preferable – including lower cost, higher absorption rates of carbon dioxide, reduced risk of diseases and reduced use of plastic.

> *"Allowing trees and shrubs to naturally regrow over much of their former landscapes could massively increase the scale of woodland creation at a fraction of the cost. It would create woodlands better able than plantations to soak up carbon dioxide, support wildlife, and adapt to a changing climate. Management costs, imported tree diseases, and plastic tree guards would all be reduced."* **Numerous responses**

Campaign responses suggested that a three-stage process would be the most effective way to deliver this. Firstly, responses argued, an action plan for trees, woodland and forestry should prioritise natural regeneration as a default approach and provide financial and technical support to achieve this. Secondly, the campaigners suggested that the regeneration process should be kick-started with assisted regeneration where natural regeneration would not be possible or would take too long. Thirdly, the campaigners argued for planting locally sourced tree saplings only where still considered necessary – and especially where this provides opportunities for public engagement.

Greater investment

The campaign argued for a blend of public and private investment, raised from the current level of £50m to at least £500m. The Rewilding Britain responses argued that this would provide economic benefits which far outweigh the initial outlay – incl. the economic benefits of more jobs as well as the long-term environmental benefits offered by trees.

The campaign stated that a mix of public and private investment in land management would deliver this – supporting a diverse approach which supports natural regeneration as well as low impact timber industry. The campaign said that an action plan for trees, woodland and forestry should give land-owners and communities the flexibility to pursue a varied approach.

> *"Financial support and access to investment capital should be provided for landowners and communities, for high up-front costs and long-term paybacks for investing. This should not impose arbitrary land use aims – for example, between farming and forestry systems. Regenerating and rewilding areas will often include a mosaic of different types of habitats on all scales, with woodland alongside wetland,*

grassland, scrub, and non-woodland trees. This diversity is vital to many species' life cycles and ecosystem functions." **Numerous responses**