

# Branching Out

A manifesto for our  
trees, woodlands,  
and forests



**CONSERVATIVE  
ENVIRONMENT  
NETWORK**

# CONSERVATIVE ENVIRONMENT NETWORK

**The Conservative Environment Network (CEN)** is the independent forum for conservatives in the UK and around the world who support net zero, nature restoration, and resource security.

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# Contents

**1** Introduction

**5** CHAPTER I  
Boosting woodland creation  
and timber security

**13** CHAPTER II  
Integrating trees into our  
farmed landscape

**18** CHAPTER III  
Reassessing our use of wood  
products for bioenergy

**24** CHAPTER IV  
Leading by example in  
the public sector

**28** CHAPTER V  
Protecting the trees we have



# *Introduction*

Trees are a golden thread running through British history and our cultural identity, from MacBeth and Robin Hood to Winnie the Pooh and Harry Potter. Whether its leaves and acorns, or the entire tree, the oak appears in symbols throughout our land, from the wreath adorning the mysterious Green Man to the Conservative Party's own logo. Trees are firmly rooted in our national and natural heritage, and, in turn, they root us in our green and pleasant land.

Conservatives understand the philosophical importance of trees. We plant a sapling knowing that we will never sit under its shade. That is a joy reserved for our children and grandchildren. The planting of a tree is a fundamentally selfless act of intergenerational exchange, a core tenet of conservatism. We take pride in acting now to ensure future generations will have a natural world to enjoy.

Majestic to behold, trees are also an integral part of daily life. They provide shelter to wildlife, absorb carbon from the atmosphere, purify our air, boost our mental wellbeing, serve as natural flood defences, cool our urban centres with their shade, strengthen the soil that surrounds them, provide sustenance to humans and animals alike, and increase pride in the local communities that host them.

In 2023, there was a national outcry as we awoke to the news that the beloved Sycamore Gap tree in Northumberland had been felled in an act of wanton vandalism. Steeped in history and cultural significance, the loss of this tree stirred something in our collective psyche. But if we were to look more closely, we would realise that the loss of a solitary sycamore tree is nowhere near as troubling as the

realisation that this upland landscape and many others like it were once covered in trees but are no longer.

Despite trees being a feature of every English community, their presence can too easily and too often be taken for granted until it is too late. The UK is one of the most nature-depleted countries in the world, with trees and woodlands some of the most high-profile victims of this decline in biodiversity. Trees are not just nice to have; they deliver many benefits to us and the environment.

The destruction of forests and woodlands has knock-on effects for our changing climate. Preserving and planting more trees in the ground is vital for sequestering carbon. Another way in which trees can prove extremely useful for tackling climate change is through the carbon-rich timber they produce. This material can be used in a multitude of carbon-intensive industries, like construction, that need to decarbonise but will require a steady supply of alternative materials in order to do so. Bolstering our own timber security therefore helps us in our collective national mission to reach net zero emissions by 2050 and supports industries and new jobs along the supply chain, like tree planting and timber processing. A thriving UK commercial forestry sector should be synonymous with greater rates of tree planting.

For timber that is harvested, the more things that can be done to it, the more jobs and industries will be created. A failure to produce and use timber domestically is a failure to create these economic opportunities. The same is true when industry jumps straight to burning wood, which inevitably releases stored up carbon into the atmosphere and removes the possibility of further economic and environmental uses of the product.

At a global level too, trees are integral actors in the fight against climate change and biodiversity loss, with forests acting as our

planet's lungs. Domestically, we are playing our part to tackle the dual climate and biodiversity crises, with our efforts encapsulated in targets to decarbonise and to halt biodiversity loss by 2030. Trees and tree planting will play an important and arguably outsized role in reaching both, which is why the government has also set an incredibly ambitious aim to increase England's tree cover to 16.5% by 2050 and to plant 30,000 hectares of woodland in the UK annually by March 2025.

The case for tree planting is clear but, collectively, we are not doing enough of it. There is no denying that woodland cover across the UK has increased, from 9% in 1980 to 13.3% in 2022.<sup>1</sup> However, England still falls far behind its European neighbours<sup>2</sup> with woodland covering a mere 10% of land (7% in 1980).<sup>3</sup> The fact it is currently at this level and not even lower is in no small part thanks to the efforts made by different Conservative governments throughout the 20th century to right some of the mass woodland clearing wrongs of the past. In the wake of the Sycamore Gap tree felling last year, the current government honoured its commitment to trees when it announced a raft of measures to support tree planting, including the creation of a new national forest.

Even with these new announcements, we are still falling well short of reaching our national tree planting targets and unlocking more of the many benefits that trees can provide. This may seem perplexing in light of the many valiant efforts we all will have seen in our local communities to plant more, led by volunteers, charities, and councils. But the scale of the tree planting challenge we have set ourselves will require the private sector to act too. For the private sector, the question of planting trees at the moment is not so much a question of "why not?", but rather "why bother?". As it stands, both the risk and reward of doing so mean the incentives often simply do not add up to an attractive proposition.

It is with the need to play our part to tackle climate change and biodiversity loss in mind, and in recognition of the economic, social, and environmental opportunities that trees can create, that we have produced this manifesto. At the last general election, there was a great temptation for political parties to engage in a bidding war on the number of trees they would plant in government. With the next general election now firmly on the horizon, it is time for a more realistic and practical approach based not only on the number of trees we plant, but what we want to achieve from planting them and how we will deliver them.

We do not profess to solve all of the problems facing trees and tree planting. Instead we offer a set of recommendations that help ensure that the incentives offered to plant trees are sufficiently appealing and fair, whilst mitigating the risks to trees that past generations have had a hand in creating. In order that future generations may have plentiful opportunities to behold a mighty oak tree's majesty for themselves or to wander through the enchanting world of a seemingly unending woodland, it is our duty as conservatives to act now.



CHAPTER I

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# Boosting woodland creation and timber security



## POLICY RECOMMENDATIONS



Establish Forestry Creation Zones in target locations around England.



Commit to a new phase of the Nature for Climate Fund.



Phase Woodland Carbon Code units into the UK Emission Trading Scheme.



Regularly review the payment rates for tree planting in the uplands.

**O**ur path towards net zero emissions by 2050 is lined with trees. Recognition of the sheer amount of timber products we will require is recognised in the UK's carbon budgets and the government has set out a plan to adopt it in its Timber in Construction Roadmap which was published in 2023 and warmly welcomed by the forestry sector.<sup>4</sup> The more things that can be done to a single piece of timber, the more jobs and business opportunities can be created up and down the supply chain. But meeting our demand for timber must be done carefully.

As the global demand for timber continues to increase, so too does the risk posed to the planet's most famous and ecologically important forests. Currently heavily reliant on imported timber to resource our decarbonisation needs across the economy, it would be unrealistic and undesirable to expect the UK to meet its entire domestic demand for

timber through domestic supply. But it is prudent to meet a larger proportion of demand through domestic forestry than we currently do, a view echoed by both the Climate Change Committee (CCC) and the House of Commons Environmental Audit Committee.

Against the backdrop of a global race to decarbonise, ensuring the sustainability of what we continue to import is only part of the battle: we must also create a more appealing offer to businesses wishing to plant in England. There are some easy steps to take in the short term that can, at the very least, send positive signals about tree planting, such as streamlining environmental impact assessments in designated low-sensitivity regions and simplifying the government grant making process. This will reduce the risk posed by long waiting times and unnecessary hurdles for land managers wanting to do the right thing.

Land that is unsuitable for growing food, because of its poor soil quality or harsh weather, can be well-suited to growing trees. Our uplands are one such environment. Many of our uplands were once carpeted in thick forests, but their tree cover is now minimal.

The challenging geography of our uplands makes arable farming impractical, so upland farms are overwhelmingly livestock-orientated. Admiration for upland farmers' rugged adversity to their terrain, and the dry stone walls which have become a familiar feature on the landscape, have worked to embed them into the culture of the communities that surround them. But upland farming is increasingly unprofitable. England is transitioning away from a system of area-based farm support payments and towards one which rewards the provision of public goods. This provides a great opportunity for upland farming to diversify and adopt new practices, sustaining its place in the British landscape for generations to come. Without action, the sector will face increasing financial pressure, and voices which question the long-term viability of its existing business model will grow louder. The

integration of trees into the farmed landscape is one of the many ways that rural communities can harness nature to diversify and strengthen their income both now and in the future.

Political concern for the UK's food security is particularly heightened following Russia's illegal invasion of Ukraine. The independent review into the food system in 2021 found that the least productive 20% of land produced just three percent of the nation's calorific intake.<sup>5</sup> As the 2030 deadline to reverse the decline in biodiversity looms into view, it is right that we ramp up our efforts to increase tree planting, and that we ensure this is not to the detriment of our food security. The uplands are some of the areas best placed to do this.

Any change which does come, however, needs to be done with consent. Welsh farmers' protests against the devolved government's rigid tree planting targets show the importance of working with - not against - farmers. The Environmental Land Management schemes (ELMs) and their 'public money for public goods' model in England provide a good template for encouraging a gradual shift towards more sustainable farming practices and improving tree cover across our precious landscapes. If we can create the right financial incentives, across all available public and private schemes, to improve tree cover, we can secure the future of upland farming, build more profitable businesses, and enhance our natural inheritance.

While recent efforts by the government to designate new national forests are certainly welcome, the entrepreneurial action we require for tree planting objectives will require a less prescriptive approach. Taking a leaf out of its own book, the government should copy the model it has created with Investment Zones to establish a joined up approach to tree planting in areas of the UK most suited to it, catalysing private sector action and investment in the process.

Tree planters, commercial and otherwise, wishing to work in these designated Forestry Creation Zones would benefit from a streamlining of the much maligned application process for woodland creation and be fast tracked toward the relevant funding pots across the forestry supply chain. The Forestry Commission has already gone some way in enabling this through its data-enabled woodland creation sensitivity map which it uses to fast-track woodland creation applications.<sup>6</sup> The England Woodland Creation Offer now affords an additional £1,100 per hectare for tree planting on low-sensitivity land, but we can go further.<sup>7</sup>

In the first instance, the government should replenish the £650 million Nature for Climate Fund, which includes the Woodland Creation Offer but is due to expire in 2025. This will provide certainty for all tree planting efforts, whether public or private, while the woodland creation components of ELMs are fully developed.

In addition, rather than just using sensitivity mapping in reaction to applications for woodland creation funds, we need proactive identification of the most suitable areas and outreach to land managers located within them to promote the available grants and financial opportunities. Designating such Forestry Creation Zones would likely skew towards parts of the north of England where the land is most suited to mass afforestation and less suited to agriculture.

This comes, of course, with an important caveat that this would not be a free-for-all, but rather that half the battle would already be won with these zones marked out as ripe for reforestation. The government's long-awaited Land Use Framework should provide a basis upon which to determine the most suitable regions of England to incentivise to undergo this transition to forestry, and to ensure that ecologically-sensitive areas are protected.

Farmers in upland areas must be bought into this land use change and have a clear path to access the financial rewards of getting on board. The government can do this by ensuring tree planting standards offered through the new system of Sustainable Farming Incentive (SFI) payments are competitive and appealing to upland farmers specifically, and that the pricing is reviewed regularly in the context of delivering on our targets, whilst also ensuring that food security is not compromised. As the government's farm subsidy transition has demonstrated, an essential part of woodland creation financing is that it must benefit the tenant as well as the landowner.

This need for joined-up action across the public, private, and voluntary sectors is especially important when considering the overzealous incentivisation of tree planting in the past, most notably in the 1980s, that led to the wrong trees in the wrong places with little care or thought for the biodiversity of the forests being created.

The Woodland Carbon Code (WCC) is a government-backed standard for woodland creation projects in the UK in order for them to be quantified, verified, and subsequently traded as carbon credits. First established in 2011, this private market for nature is a reliable and well-respected source of compensation for the large UK companies that are mandated to report their greenhouse gas emissions. When operating effectively, this carbon market can reduce the reliance on public spending for tree planting of all descriptions, rewarding especially the fast-growing, carbon-rich conifer species.

The code has, quite rightly, become increasingly reflective of the effect that monoculture forests, as with all monoculture crops, can have on the ability to sustain biodiversity. The need to mitigate this is reflected in the UK Forestry Standard (UKFS) which allows for up to 85% of a project to be planted with conifer species, and is also factored into the environmental impact assessments required to gain project

approval. This also reflects the general need to have mixed, uneven-aged woods with no clear felling, which can support nature and commercial forestry.

The WCC's efforts are noble but, after over ten years of operation, it has not delivered the desired tree planting outcome we need at the scale our national target now requires. The per unit price is simply too low to provide a big enough incentive for the market to get involved. This is unsurprising given its voluntary nature and has resulted in less than 60% of suitable land in the UK being considered economically viable for woodland creation, according to a policy paper published by King's College London.<sup>8</sup>

But it does not need to be this way. In fact, the economics of tree planting could be improved significantly through its inclusion in the UK Emissions Trading Scheme (ETS). Doing so could raise the price of an individual credit by up to 67%, becoming the financial incentive many land managers are looking for to start planting trees.<sup>9</sup> This, in turn, would have the potential to remove and store up to 19 million tonnes of carbon emissions from our atmosphere, helping us in our efforts to reach net zero emissions by 2050.

It is vital that all WCC units delivered under the ETS reflect genuine emissions abatement. Strong standards are needed to make sure both that payments under the scheme reflect new abatement that would not have happened without the payment, and that those issuing credits are required to replace units that have been destroyed or damaged by weather events or pests. A gradual phase-in will help to prevent any downward pressure put on the ETS price, which could risk blunting incentives to decarbonise in other industries.

For the sake of our natural environment and efforts to fight climate change, and the national targets that underpin them both, the

UK should phase the WCC into the ETS as part of our admission of more negative emissions technologies, like direct air capture. Doing so will help to deliver the habitat restoration we need, at the scale we require it, strengthening rural economies.



## CHAPTER II

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# Integrating trees into our farmed landscape



## POLICY RECOMMENDATIONS



Convene more Woodlands for Water projects, targeting farmland most at risk from flooding and catchments with the lowest amount of riparian planting.



Conduct in-depth mapping of current rates of riparian planting along English watercourses.



Deliver the new, well-funded option for agroforestry in the Sustainable Farming Incentive.

**W**here mass afforestation is possible and environmentally appropriate, it should be incentivised. But sometimes trees are best integrated into the existing landscape, here and there, rather than everywhere.

Many areas in England, for example, quickly run into issues when trying to access tree planting grants pertaining to ground nesting bird sites. These precious and rare birds, such as curlews and lapwings, and their habitats, are protected by rules and regulations. The nature of their nesting means they steer clear of wooded areas, where predators can lurk in the shadows.

This is certainly not conducive to the mass afforestation of land that is required for timber production demands or to meet our emissions reduction targets, nor is it helpful for farmers and other land managers that wish to access the government's Woodland Creation Offer. Faced

with obstructions, landowners and managers of all types and sizes may ditch their planting ambitions. This has led to great frustration in the productive forestry and agricultural sectors in areas with populations of ground nesting birds. This has been alleviated somewhat with the publication of government guidance on the matter, but there is still work to be done to communicate this effectively on the ground and ensure that the vital task of protecting nesting sites does not inhibit wider tree planting efforts.<sup>10</sup>

Undeniably, however, some areas of unproductive farmland can and should be converted into woodland, as the Woodland Creation Offer encourages, but this is not the case for all farmland. In some instances, trees can be integrated into productive farmland in interesting and innovative ways.

Hedgerows are an iconic feature of our countryside but are not always regarded as the trees that they are despite their vital role in sequestering carbon and providing a haven for wildlife. The government deserves great credit for the steps it has taken to legally protect hedgerows and the creation of dedicated standards for hedgerow creation within ELMs.

Alongside the restoration of these traditional features, farmers can integrate new and innovative approaches to tree planting on their land. So-called “agroforestry” can take many forms such as alley cropping and windbreakers, as well as working on arable and livestock farmland. In doing so, agroforestry not only boosts biodiversity on fields but, according to the Game and Wildlife Conservation Trust, can improve water quality, soil conservation, and carbon sequestration, while creating economic opportunities for farmers and their local communities.<sup>11</sup>

The government has committed to rolling out a new SFI payment that specifically targets agroforestry, complementing its target outcome for “increased uptake of agroforestry so that it becomes an increasingly normal part of farm businesses for 2050”.<sup>12</sup> It should continue to move ahead with the rollout of this new standard.

The natural field margins that are the banks of our rivers and their many tributaries are another area of farmland ripe for tree planting. Planting along water courses creates a buffer zone between the activity on the field and the neighbouring aquatic ecosystem, protecting both.

The roots of the trees can help to protect farmland and improve water quality by reducing soil erosion and slowing down flood waters. Riparian vegetation filters sediments as well as nutrients and chemicals that run off of farmed fields, helping also to reduce the risk of algal blooms and chemical water pollution posed by agriculture.

Yet another benefit of riparian planting is that it provides much-needed corridors through which wildlife can travel without the danger posed by human activity, not to mention the food, shelter, and nesting sites trees can offer along the way, boosting the biodiversity of the watercourse.

Recognising the important role that riparian tree planting plays in protecting both the farmed and aquatic environment, as well as the unintrusive addition to the farmed landscape that these trees can be, more investment into riparian tree planting should be given. Funded by the Nature for Climate fund, the government’s first Woodlands for Water project did exactly this by convening leading environmental organisations to utilise the England Woodland Creation Offer, but unfortunately has been limited to only six catchments.

The Woodland for Water programme should be reignited using the Water Restoration Fund with a new set of catchments across England.

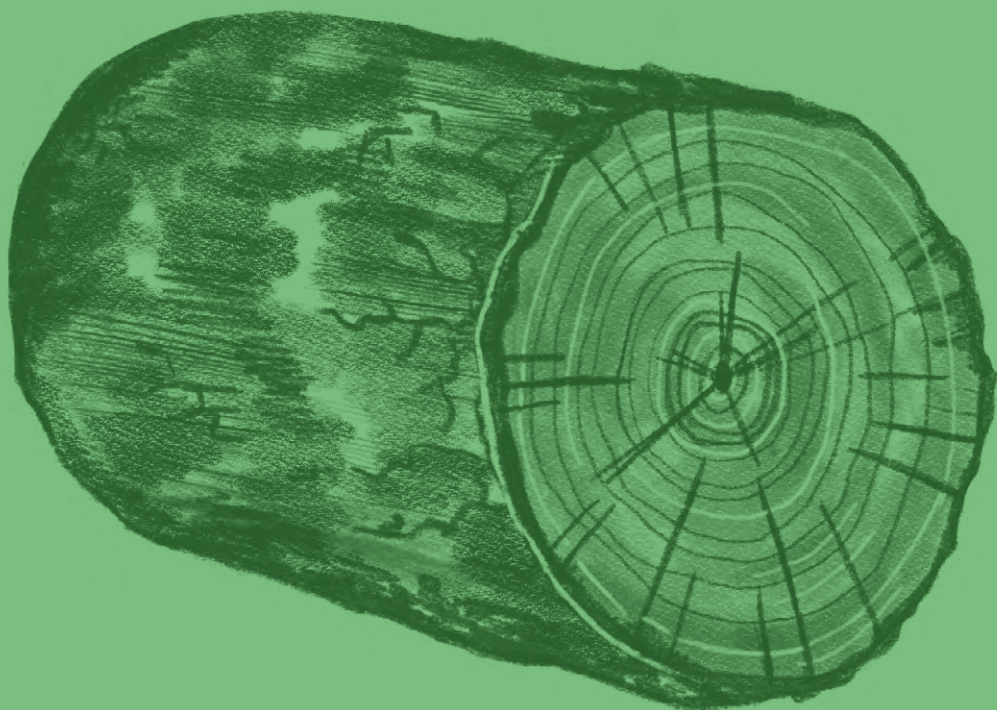
Doing so can line huge swathes of natural watercourses with trees, with the surrounding environment and farmland reaping the benefits of doing so. Priority should be given to the highest flood risk areas and those that currently lack trees along watercourses. The government does not currently possess the latter data set and should therefore conduct an in-depth assessment of the current prevalence of trees along watercourses to help determine these target areas.<sup>13</sup>

Whether on the sidelines or stealing the show, trees do have a place on farmland. While some areas may be better suited to larger scale afforestation efforts, this is not always the case. Having options available for all types of on-farm tree planting will ensure that farmers can play the part they often want to play in reaching our national tree planting targets and can reap their own benefits of doing so, in the form of reduced soil erosion and improvements to water quality and biodiversity.

## CHAPTER III

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# Reassessing our use of wood products for bioenergy



## POLICY RECOMMENDATIONS



Rigorously enforce and strengthen the sustainability of our biomass energy imports.



Require producers of biomass energy to demonstrate full financial transparency in order to receive subsidies after 2027.



Commission and publish an independent review into the impact of BECCS on household energy bills, lifecycle carbon emissions, biodiversity, and land use.



Ask the Climate Change Committee to model pathways for reaching net zero by 2050 with, with less, and without BECCS.

**A**t the core of conservatism are the twin values of fiscal responsibility and environmental stewardship. Fundamentally, they are values of fairness: ensuring that future generations are not burdened with our financial and environmental debts and that taxpayers' hard-earned money is spent wisely for the public's benefit. A growing number of environmentalists, energy experts, and policymakers are concerned these principles have been disregarded with the government's policy on bioenergy.

Bioenergy - energy generated through the burning of wood products - has allowed the UK to reduce its reliance on coal. However, key questions remain unanswered about the environmental impact of bioenergy generators and their financial sustainability, not least given

that their continued operation would be impossible without taxpayer or billpayer subsidies. Repeated concerns have been raised about the sourcing of the wood used by biomass plants. An investigation by BBC Panorama in 2022, for example, found that primary forests in North America had been cut down to supply pellets for incineration in the UK, contributing to global deforestation.<sup>14</sup>

Creating a more timber-secure economy that mitigates the risk of global deforestation is no easy feat. The drivers of global deforestation are multifaceted and the international dimension makes it harder for a single country to regulate. The government has taken successful strides with other products by enacting due diligence legislation for a set of forest-risk commodities as well as more stringent financial requirements.

As the sustainability of biomass energy imports continues to make headlines, the government should now develop and enforce more stringent sustainability standards to ensure our remaining imports are not having adverse consequences overseas. A prudent place to start is with the lifecycle carbon emissions, ensuring that emissions that are generated from the harvesting, processing, and transportation of the biomass feedstock are correctly accounted for and subject to stricter limits.

The means of calculating the carbon emissions from biomass plants potentially hides their negative impact too. At present, emissions from the burning of wood are allocated to the carbon budget of the country in which the source tree was grown, rather than the country in which it was burned. This matters given the potential scale of its emissions. A study by the thinktank Ember found that Drax's wood burning power plant was the UK's largest single source of carbon dioxide emissions, despite being technically considered carbon neutral.<sup>15</sup> These emissions should be reflected in UK policy on emissions reduction.



Both government and industry aim to deploy carbon capture and storage technology (CCS). Proponents argue that bioenergy with carbon capture and storage (BECCS) could provide a carbon negative means of meeting our future energy demand. Indeed, the government's independent adviser on tackling climate change, the CCC, includes BECCS in its 'Balanced Pathway' for meeting the legally-binding commitment to net zero greenhouse gas emissions by 2050.<sup>16</sup> CCS has huge potential to aid decarbonisation in the UK, but BECCS is a different beast.

As UK households and industry reduce their use of fossil fuels, our demand for electricity is expected to at least double by 2050.<sup>17</sup> To meet this demand and to offset residual emissions from hard to decarbonise sectors, the CCC's estimates that the UK will need 53 megatonnes per year of BECCS by 2050 and recommends increasing the proportion of biomass feedstock that is sourced from the UK.<sup>18</sup> Currently, 66% of biomass used for energy generation is sourced domestically. But our supply of land is limited.<sup>19</sup>

There are multiple competing demands for our land domestically, from food production to housebuilding. We simply cannot continue to grow the number of trees required to meet our rising demand for biomass without reducing the land available to grow food, supply existing wood-based industries, or to meet our tree planting targets. Global demand for biomass to generate energy is also projected to increase, meaning the available supply will be squeezed, further pushing up the cost. This is particularly concerning given the significant public subsidies granted to the sector. In light of this huge financial commitment, in order to receive subsidies after the current regime ends in 2027, the government should at the very least require producers to demonstrate full financial transparency to ensure that public money is being spent wisely.

The ability of BECCS to deliver negative emissions is also dependent on the carbon neutrality of burning biomass, which is by no means guaranteed. Trees must first be grown, their waste wood gathered and fed to the incinerator. Then, the carbon emissions from these chimneys must be collected and stored underground - a process which is as yet unproven at scale. New trees must be planted and grow sufficiently to have then sequestered the equivalent amount of carbon that was collected - this process must be compatible with the UK's carbon budgets, yet current sourcing arrangements often fail this criteria.<sup>20</sup>

This plan not only has many stages, but is also international in its scope, and subject to external risks like forest fires. As a result, transparency of carbon emission reporting and trust in the service providers along the entire global supply chain is absolutely critical. The increasing amount of investigations and negative news coverage of both of these points calls the trust-based system into question, let alone the trust in the unproven scale required to make BECCS work.

The National Audit Office's recent report, 'The Government's Support for Biomass', was clear the government "cannot demonstrate that its current arrangements are adequate to give it confidence industry is meeting sustainability standards".<sup>21</sup> This lack of certainty in the technology, and of trust and transparency should not be rewarded with huge amounts of taxpayers' or bill payers' money until it can be proven at scale.

In light of these questions, last year the government published its Biomass Strategy and an accompanying report from its Chief Scientific Advisor. However, this left even more questions outstanding. Neither addressed the likely impact of BECCS on household energy bills, biodiversity, or land use.

## BRANCHING OUT

Drax received £617 million in government subsidies in 2022. The existing subsidy agreement for the sector is due to end in 2027.<sup>22</sup> Whilst significant questions remain over the environmental sustainability of BECCS and its financial viability, it cannot be right for hard-earned taxpayers' and bill payers' money to be spent on further subsidies without very clear strings attached, especially on sustainability and the transparency of generators' finances.

Before committing to spend any more public money, the government should first commission and publish an independent review into the impact of BECCS on household energy bills, lifecycle carbon emissions, biodiversity, and land use. In addition, the CCC should be asked to consider options for reaching net zero by 2050 with, with less, and without BECCS, and consider other negative emissions alternatives.

CHAPTER IV

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Leading by  
example in the  
public sector



## POLICY RECOMMENDATIONS



Include nature restoration as a duty for the Forestry Commission.



Issue clear guidance to local authorities on the right place, time, and type of tree to plant.



Amend the Highways Act 1980 and Traffic Management Act 2004 to make it easier for local authorities to plant more trees.

The public sector owns a significant amount of land in England - approximately eight percent.<sup>23</sup> Local councils alone have been estimated to own four percent, around 1.3 million acres. With targets to protect 30% of our land for nature by 2030 and to halt species decline by the same year, we will need all hands on deck if we are to achieve them. The government should echo this sentiment by asking all public bodies to contribute their fair share towards nature recovery as a whole, and to our tree planting targets specifically.

A national shortage of ecologists will increase the likelihood of mistakes made in tree planting, such as misplanting of trees of the wrong type, at the wrong time, and in the wrong place.<sup>24</sup> In the course of researching this work, for example, we found one local authority which had replanted trees on the same site four times over the course of a year. This was because the saplings were repeatedly planted in an unsuitable location and during the wrong season for them to take root.

These dead saplings, and their cost to the public purse, could have been avoided if the local authority's maintenance department had been aware of the right time to plant these trees, and had acted accordingly. If we are to build greener streets, parks, and neighbourhoods, the government needs to improve the guidance offered to local authorities to make it clearer on the right place, time, and type of tree to plant. This guidance will complement the government's funding to enable local authorities to hire the qualified personnel they need.<sup>25</sup> It should also be accompanied by a requirement on local authorities to keep an accurate record of their tree planting and felling activities to ensure that they can be held accountable.

When done well, street trees can transform local communities and provide a multitude of benefits from urban cooling to better air quality. There is a strong correlation between urban greenery and the geography of socio-economic inequality, with the presence of this greenery having a demonstrable, positive impact on both pride in the local community and mental health. The Woodland Trust's Tree Equity score identifies areas of the UK most in need of additional tree cover.<sup>26</sup> Its map is a valuable resource that should help to inform the geographical strategy of future urban tree planting initiatives by local and national governments.

Unfortunately, where local authorities could and should plant more trees, red tape frequently prevents them from doing so. The Highways Act 1980 and Traffic Management Act 2004 are important pieces of legislation to manage the use, maintenance, and condition of roads across the UK. A report published last year from Create Streets found that these provisions for local authorities to maintain free-flowing roads are often misinterpreted as a means to prevent them from planting more trees.<sup>27</sup> The licensing rules established within

Section 142 of the Highways Act should be relaxed to make it easier for local residents to plant street trees.

The government should also publish new statutory guidance for local authorities on how to improve green coverage across our streets, roads, and highways. This guidance should prioritise planting along strategic routes in our towns and cities, to reclaim these spaces for pedestrians. These small changes could help to create greener, healthier streets fit for the future.

Another public sector actor, which is charged with caring for our nation's woods and trees, is the Forestry Commission. Established in 1919, the Forestry Commission's primary purpose was to strengthen the nation's timber security through the creation of new public forests and a bolstered timber industry. The public estate has grown significantly and the commission is now one of the largest landowners in the UK.<sup>28</sup> And yet, despite this expansion, the UK remains a major importer of timber and we are still not planting trees at the rate we need to meet demand.

Additionally, with the threat of biodiversity loss looming large in landscapes across the UK, it is important that the Forestry Commission plays its part in halting the decline of nature on its land. This should include the commission reviewing its own land portfolio to make sure that it is delivering for nature alongside forestry growth, and passing on land, such as that which is no longer forested, to land managers with the necessary expertise to continue restoring these habitats.<sup>29</sup>

Updating the remit of this public body to reflect the realities of the present day will ensure that the UK's largest landowner and the forestry regulator is playing its part in protecting and restoring nature alongside encouraging a thriving commercial forestry sector.

CHAPTER V

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Protecting the  
trees we have





## POLICY RECOMMENDATIONS



Update the grey squirrel action plan to provide clearer incentives for land managers to effectively manage grey squirrel populations, in line with new methods and technologies.



Support more pine marten reintroductions in appropriate areas of the UK.



Update the deer management strategy to include support for venison processing along the supply chain and issue new guidance within the Government Buying Standard for Food to include venison in the food offering of public institutions.



Introduce clear labelling for all plants that, if not carefully managed, can be invasive.

**W**e may consider trees to be strong, hardy, and resilient, but in reality they are almost constantly at risk from pests, disease, and human interference. When one thinks of such risks to trees, the Dutch elm disease crisis is the go-to example. Having first arrived in the UK from Canada in the 1960s, the disease has since wiped out millions of our elm trees. This has been joined in more recent years by the ash dieback disease and the spruce bark beetle. But the danger does not stop there: while the particular pest or disease may change, the risk remains.

Grey squirrels were first introduced to the UK from North America in the 19th century and have proved detrimental to our native red squirrel population ever since, most notably because of their ability to pass on the deadly squirrelpox virus with no harm to themselves. As a result, red squirrel numbers have dwindled to a mere 160,000 or so in the UK, often found in remote corners of Scotland and Wales.<sup>30</sup>

But it is less well known that grey squirrels are also a serious pest to trees. They strip bark from tree trunks and branches in order to access the nutritious sap beneath. This can severely damage, or even kill, trees, and also creates entry points for pests and disease. The economic cost of damage from grey squirrels to our woodlands, not including costs to UK biodiversity, has been estimated at £37 million per year in England and Wales.<sup>31</sup>

The government's decision to update its grey squirrel action plan is therefore a welcome one. The original plan, published a decade ago, went some way to tackle this pest, but time has revealed that action has not been sufficient with grey squirrels continuing to proliferate.

One notable gap in the existing plan was the lack of clear incentives for land managers to manage the grey squirrel population in concert with their neighbours. In order to tackle this pest head-on, the government has embedded some grey squirrel management incentives, such as traps and culling, into its new SFI payments within the broader ELM schemes. This should be extended to other management strategies, such as contraception, in line with findings from Defra-funded research and trials.

Another element of this strategy should be to introduce another native, charismatic creature back into our landscapes: the pine marten. Due to being heavily hunted for its fur throughout the 19th century and the rapid decline of its natural, arboreal habitat, the pine marten

quickly became one of Britain's rarest predators and was considered functionally extinct in England by the early 20th century. The passage of the Wildlife and Countryside Act 1981 during the premiership of Margaret Thatcher afforded the remaining population protection and pine marten numbers have crept up ever since, but remain pitifully low.

Despite being near to extinction, the species hung on in remote corners of Britain. In the north of Scotland, red squirrels coexist with pine martens in woodlands and mixed plantations. Grey squirrel numbers, on the other hand, have been shown to be controlled in areas where pine martens are present. However, the exact process of how pine martens control grey squirrel populations is not fully understood.

Developing a better understanding of this relationship through research and pilot reintroduction projects, as the government is already enabling, will create the necessary evidence base to approve pine marten reintroduction projects across the UK. In line with existing proposals, where appropriate, more pine marten reintroduction pilots should take place in the short term to help build and strengthen this evidence base in the long term.<sup>32</sup>

Another plan the government is seeking to update is its deer management strategy. There must be positive encouragement to land managers from the government to tackle deer numbers, to alleviate the sense of risk currently felt by rural communities wanting to act. The deer population in the UK is at its highest level in 1000 years, with numbers thought to exceed 2 million.<sup>33</sup> The grazing habits of this booming population presents problems for the natural regeneration of woodlands and to farmers' livelihoods as their crops are eaten, not to mention issues with road safety as collisions between deers and vehicles continue to rise.<sup>34</sup> Fortunately, the need for deer management is a delicious problem to solve.

Supporting the wild venison industry through grants to establish more venison processing and refrigeration facilities could encourage better deer management and thereby reduce deer numbers. Currently the limited facilities are blocking the ability to harvest this protein at the scale required. Greater wild venison processing would support efforts to boost domestic food production levels and bolster rural economies. A lower deer population would remove a barrier to natural woodland regeneration.

Just as there are stipulations about the frequency of serving fish in the public sector, caterers should also be encouraged through new guidance in the Government Buying Standard for Food to use more venison, which is a low-cost, nutritious form of protein.

As grey squirrels, deer, and Dutch elm disease have long reminded us, human interference, in the form of importing goods from overseas, is often to blame for environmental harms. The same is true of many plant species, most notably being rhododendron ponticum and Japanese knotweed, which suffocate other plant growth and dominate their habitats.

The government has previously forbidden the sale of nuisance plants, through multiple pieces of legislation. But all too easily one invasive plant can be substituted by another non-native plant that has the potential to become invasive. Plants that are demonstrably harmful to the environment should be banned. But to do so requires a scientific, evidence-based case, which is often lacking. As an interim step, the government should introduce a labelling requirement for all plants that risk becoming invasive to inform amateur and expert gardeners and horticulturalists alike of the potential dangers of their purchase.

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