

'England Tree Strategy: Policy Discussion REA Consultation Response

The Association for Renewable Energy & Clean Technology (REA) is pleased to submit this response to the above consultation. The REA represents a wide variety of organisations, including generators, project developers, fuel and power suppliers, investors, equipment producers and service providers. Members range in size from major multinationals to sole traders. There are over 500 corporate members of the REA, making it the largest renewable energy trade association in the UK. The Wood Heat Association is the members forum within the REA that advocates for the modern wood heating and related biomass heating industry including wood fuel suppliers, biomass boiler and stove installers and distributors, and anyone involved in the supply chain.

Consultation Question 1: Would you like your response to be treated as confidential (please see this consultation's Data Privacy Notice?)

No.

Consultation Question 2: What is your name?

Sam Tickle

Consultation Question 3: What is your email address?

stickle@r-e-a.net

Consultation Question 4: Please tell us about yourself (select one option)

An association

Consultation Question 5: What is your organisation?

The Association for Renewable Energy & Clean Technology (REA)

Consultation Question 6: Which actions would address the financial barriers that prevent the creation of new woodland? (select all that apply)

- a) Consolidating the current range of woodland creation grants into one
- b) Increasing the payment rates for incentives for woodland creation
- c) Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply
- d) Widening the eligibility criteria for the type of woodlands and tree planting that can be funded

- e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental land management Scheme
- f) A quicker approval process for grant agreements
- g) Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)
- h) Introducing mechanisms that provide an annual cash flow in the woodlands' early years
- i) Introducing mechanisms to realise a secure long-term cash flow for ecosystem services
- j) Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation
- k) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to derive an ongoing annual income from the land
- l) Other - please specify in no more than 25 words

There are no grants for establishment of SRC or SRF woodland or the associated infrastructure.

Consultation Question 7: Which actions would be most effective in addressing the financial barriers that prevent the creation of new woodland? (select a up to three options)

- a) Consolidating the current range of woodland creation grants into one
- b) Increasing the payment rates for incentives for woodland creation
- c) Widening the eligibility criteria for applicants to our woodland creation grants so more applicants can apply
- d) Widening the eligibility criteria for the type of woodlands and tree planting that can be funded**
- e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental land management Scheme**
- f) A quicker approval process for grant agreements
- g) Support if trees fail to establish due to no fault of the owner (for example, due to tree health or severe weather)
- h) Introducing mechanisms that provide an annual cash flow in the woodlands' early years
- i) Introducing mechanisms to realise a secure long-term cash flow for ecosystem services**
- j) Introducing measures to stimulate more private investment (e.g. green finance) in woodland creation
- k) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to derive an ongoing annual income from the land
- l) Other - please specify in no more than 25 words

Consultation Question 8: Woodlands provide a range of ecosystem services that provide benefits to businesses and society. How could government better encourage private investment in establishing trees and woodland creation? (Maximum 150 word response)

Essential to new woodland creation is ensuring there is a strong market price for both woodland products and the environmental services they provide. As stated in the REA's response to the Environment Land Management (ELM) consultation (1) blending public and private finance through both ELMS and the England Tree Strategy will be vital. This will require building on what is already happening in the UK, with Scotland being the clearest example – with 90% of tree planting coming from the private sector. If it is to be successful in increasing privately funded planting (which currently sits at a fifth of Scottish levels) (2), it must help increase both demand for woodland products, including for bioenergy consumption, as well as firmly reward environmental services like carbon savings. In the future, this could be blended with the UK ETS, and projects could be bundled together to allow ease of investment.

References:

- (1) <https://www.r-e-a.net/resources/rea-response-to-defras-environment-land-management-elm-consultation/>
- (2) <https://www.woodlandtrust.org.uk/press-centre/2020/06/government-planting-figures/>

Consultation Question 9: Which actions would address the non-financial barriers to the creation of new woodland? (select all that apply)

- a) Consolidating the current range of woodland creation grants into one
- b) Providing access to better information on the income streams well managed woodland can provide
- c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills
- d) Providing the investment community with access to expert advice on woodland creation and forestry knowledge and skills
- e) Outreach to present the benefits of trees and forestry to land managers
- f) Outreach to present the benefits of trees and forestry to the investment community
- g) Outreach to present the benefits of trees and forestry to local communities
- h) Changing policy so it does not treat afforestation as a permanent land use change
- i) Increasing availability and access to contractors to plant and maintain the trees
- j) Increasing availability of desired bio secure planting material
- k) Educate and enthuse a new generation to expand the forestry industry
- l) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land
- m) Developing a supply of diverse and locally-appropriate seed and planting material by supporting community tree nurseries and other small nurseries that provide UK sourced and grown trees.

n) Providing best practice guidance on how best to achieve tree cover through natural establishment (e.g. most suitable locations, ground preparation, fencing requirements and decisions on management over time).

o) Other - please specify in no more than 25 words

Consultation Question 10: Which actions would be most effective in addressing the nonfinancial barriers to the creation of new woodland? (select up to three options)

- a) Consolidating the current range of woodland creation grants into one
- b) Providing access to better information on the income streams well managed woodland can provide
- c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills
- d) Providing the investment community with access to expert advice on woodland creation and forestry knowledge and skills

e) Outreach to present the benefits of trees and forestry to land managers

f) Outreach to present the benefits of trees and forestry to the investment community

g) Outreach to present the benefits of trees and forestry to local communities

h) Changing policy so it does not treat afforestation as a permanent land use change

i) Increasing availability and access to contractors to plant and maintain the trees

j) Increasing availability of desired bio secure planting material

k) Educate and enthuse a new generation to expand the forestry industry

l) Developing new approaches to partnerships between land owners and woodland investors or managers which enable the landowner to retain ownership of the land

m) Developing a supply of diverse and locally-appropriate seed and planting material by supporting community tree nurseries and other small nurseries that provide UK sourced and grown trees.

n) Providing best practice guidance on how best to achieve tree cover through natural establishment (e.g. most suitable locations, ground preparation, fencing requirements and decisions on management over time).

o) Other - please specify in no more than 25 words

Consultation Question 11: Which actions would address the regulatory barriers that prevent the creation of new woodland? (select all that apply)

a) Providing access to better guidance on how to meet the UK Forestry Standard

b) Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes

c) Empowering the Forestry Commission to make decisions that reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in our 25 Year Environment Plan

d) Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Reduce the time and costs associated with Environmental Impact Assessment for afforestation.

g) Other -please specify in no more than 25 words

Consultation Question 12: Which actions would be most effective in addressing the regulatory barriers that prevent the creation of new woodland? (select up to three options)

a) Providing access to better guidance on how to meet the UK Forestry Standard
b) Local partners agreeing and setting priorities for woodland creation and other habitat restoration across landscapes

c) Empowering the Forestry Commission to make decisions that reflect the national obligation to meet net zero emissions by 2050 and achieve the investment in natural capital set out in our 25 Year Environment Plan

d) Implementing a joint approach to land management across central government and its agencies including those responsible for protected landscapes

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Reduce the time and costs associated with Environmental Impact Assessment for afforestation.

g) Other -please specify in no more than 25 words

To emphasise, members report that 'f' is crucial. Current administration around the Environmental Impact Assessment is considered disproportional and a major barrier to new woodland.

Consultation Question 13: How can we most effectively support the natural establishment of trees and woodland in the landscape? (Maximum 100 words)

The Government must set long-term policy certainty and create an environment where farmers, landowners, managers, and financiers feel their investments are secure when increasing involvement. Many of our answers to the multiple-choice questions (MCQ) are calling for clarity, whether it be the link between ELMs and wider Government strategies and targets, the current administrative regime for forestry, or wider concerns around education – all require a strong policy environment with clear objectives and a roadmap to getting there. Without this direction of travel, forestry will remain siloed and unable to achieve its potential.

Consultation Question 15: Which of the following actions would be most effective in helping expand woodland creation in locations which deliver water, flood risk benefits and nature recovery? (select up to three options)

a) Widening the eligibility criteria for woodland creation grants so more applicants can apply, and more forms of woodland are eligible

b) Widening the eligibility criteria for woodland creation grants so more sizes of woodland are eligible

c) Increasing grant payments for tree planting along water courses, steep sided slopes, and difficult sites

d) Quicker approval process for grant agreements

e) Providing a clear explanation and guarantees of how trees planted between now and 2024 will be considered under Environmental Land Management Scheme

f) Implementing a joint approach to land management across government, including authorities responsible for protected landscapes

g) Providing better access to advice and guidance on woodland creation, forestry expertise and training

h) Other - please specify in no more than 25 words

Consultation Question 17: Which actions would be most effective to increase protection for trees and woodland from unsustainable management? (select up to three options)

a) Introducing measures to support compliance with the UK Forestry Standard

b) More effective information sharing between government departments and their delivery bodies to inform decisions impacting on woodland, including to prevent woodland loss

c) Introducing clearer processes for licencing tree felling, with felling licences that can be suspended, withdrawn or superseded

d) Greater penalties for non-compliance with the requirements of the Forestry Act

e) Powers to set wider felling licence conditions, for example to enable enforcement of compliance with the UK Forestry Standard

f) A clearer policy presumption that all trees felled without a licence will be replaced (except in exceptional circumstances)

g) Refining the process of making Tree Preservation Orders, and clarifying the criteria to improve consistency in application of the policy across local authorities

h) Other - please specify in no more than 25 words

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

a) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products

b) Providing grant support for a wider range of management activities

c) Providing grant support for the restoration of Plantations on Ancient Woodlands Sites (PAWS)

d) Providing support for woodland infrastructure such as roading

e) Providing grants or loans for equipment, for example, harvesters

f) Support to increase the productivity/supply chains for woodland products

g) Support for land owner collaboration in woodland management

h) Government requiring more domestic timber through procurement policies

i) Other - please specify in no more than 25 words

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

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

Consultation Question 22: Which actions would address the non-financial barriers to woodland management? (select all that apply)

- a) Providing user friendly woodland management services aimed at 'non forester' woodland owners**
- b) Ensuring public recognition of woodlands that are managed sustainably (for example, like Green Flag awards)**
- c) Providing better communication of the benefits and need for woodland management with land managers and investors**
- d) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products**
- e) Training to increase the forestry skills capacity in agricultural workers**
- f) Other - please specify in no more than 25 words.

Better efforts need to be made to educate the public on the realities and benefits of woodland and perennial energy crop management.

Consultation Question 23: Which actions would be most effective at overcoming the nonfinancial barriers to woodland management? (select a maximum of three options)

- a) Providing user friendly woodland management services aimed at 'non forester' woodland owners
- b) Ensuring public recognition of woodlands that are managed sustainably (for example like Green Flag awards)**
- c) Providing better communication of the benefits and need for woodland management with land managers and investors
- d) Providing better information on timber prices, grant schemes and market opportunities for wood and non-wood products**
- e) Training to increase the forestry skills capacity in agricultural workers
- f) Other (if added, your own entry to question 21)**

Better efforts need to be made to educate the public on the realities and benefits of woodland and perennial energy crop management.

Consultation Question 24: Which actions would overcome the regulatory barriers to woodland management? (select all that apply)

- a) Streamlining delivery of current regulations (for example, self-service felling licences for tree felling proposals that would not reduce woodland cover)**
- b) Placing responsibility for complying with woodland regulation on the woodland manager rather than the woodland owner**
- c) Placing a legal obligation on all land owners to manage their woodland**
- d) Other - please specify in no more than 25 words**

With regards to option C, the responsibility should be joint and promote a sense of co-operation.

Consultation Question 25: Which actions would be most effective at overcoming the regulatory barriers to woodland management? (select one option)

- a) Streamlining delivery of current regulations (for example, self-service felling licences for tree felling proposals that would not reduce woodland cover)**
- b) Placing responsibility for complying with woodland regulation on the woodland manager rather than the woodland owner
- c) Placing a legal obligation on all land owners to manage their woodland
- d) Other (if added, your own entry to question 23)

Consultation Question 28: Which of the following actions are or would be most appropriate for England's trees and woodlands to contribute to climate change mitigation and helping to achieve net zero? (pick up to three options)

- a) Bringing woods into management to enhance their future resilience to climate change and secure greenhouse gas emissions reduction in other sectors through wood replacing 'carbon intensive' materials (acknowledging that this will lead to a short to medium reduction on carbon stored in the woodland)**
- b) Planting UKFS-compliant productive forests to provide a strong carbon sink over the coming decades and then a source of sustainable timber to meet the needs of future generations
- c) Planting predominantly native woodland to act as a long term store of carbon
- d) Establishing 'energy forest' plantations (short rotation coppice and short rotation forestry) to satisfy future biomass demand for bioenergy with carbon capture and storage**
- e) Encouraging agroforestry to increase the amount of carbon stored on productive farmland**
- f) Strengthening the protection of all woodland to reduce greenhouse gas emissions from deforestation

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

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

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

1. a) Providing more training opportunities to support woodland management and creation
2. e) Facilitating networks to exchange ideas and share good practice
3. b) Providing legal support to community groups for the acquisition or lease of woodland
4. d) Enabling community groups to participate in the management of their local woodland
5. c) Enabling community groups to influence decision making about the management of their local woodland
6. h) Supporting the growth of woodland social enterprise¹⁶ in and around towns and cities
7. f) Providing better support for community forests in areas of greatest need
8. g) Creating new community forests in areas of greatest need

Consultation Question 40: How could policy about the permanency of woodlands better support tree establishment for agro forestry or energy crops? (select one option)

- a) Changing policy so it does not treat afforestation as a permanent land use change
- b) Adjusting policy so energy forestry crops (short rotation coppice and short rotation forestry) are not permanent land use change

- c) Retaining the current position whereby afforestation is generally a permanent land use change
- d) Not sure

Consultation Question 41: Which actions would best increase the uptake of energy forestry? (select up to two options)

- a) Providing financial support for the capital costs of energy forestry**
- b) Clarifying the taxation of energy forestry (as either agriculture or forestry)
- c) Clarifying the regulatory position for energy forestry (for example, can I change land use in the future)
- d) Providing support to develop a secure supply chain (such as forward contracts for feedstock)**
- e) Providing better advice and guidance on energy forestry
- f) Increasing skills capacity in energy forestry
- g) Other - please specify in no more than 25 words

Consultation Question 42: Which actions would best increase the planting of more trees on farms? (select up to two options)

- a) Clarifying the regulation of agroforestry as either agriculture or forestry
- b) Clarifying the implications for the land holding's tax status of planting more trees
- c) Providing better advice and guidance on woodland creation and management
- d) Providing incentives for a wider range of tree planting on farms**
- e) Funding for the advice and the design of schemes for trees on farms and agroforestry**
- f) Providing better advice and guidance on how woodland creation and management can contribute to farm business models
- g) Other - please specify in no more than 25 words

Consultation Question 43: Which actions would best increase agroforestry, woodland creation and management on tenanted farmland? (select up to two options)

- a) Providing industry led guidance, best practice and case studies of how tenants and landlords can work together to deliver benefits for both parties from diversification into tree planting and agroforestry on tenanted land**
- b) Providing eligibility criteria for tree establishment grant agreements to discourage the proactive resumption of tenanted farmland
- c) Reviewing how tenancy agreements approach the responsibility for and rights to trees
- d) Confirming the property rights to long-term carbon benefits
- e) Other - please specify in no more than 25 words

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

- a) Professional forester**

- b) Supervisor for forest works
- c) Machine operator, for example, tractor/harvester/forwarder drivers
- d) Hand cutter / chainsaw operator
- e) Tree planter
- f) **Tree nursery workers**
- g) Forestry educators
- h) Land agents, surveyors and architects with specialist forest knowledge
- i) All of the above
- j) Other - please specify in no more than 25 words

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

- a) Providing grant support for wider range of management options
- b) Providing support for woodland infrastructure such as roading**
- c) Providing grant or loans for equipment (for example, harvesters)
- d) Providing support for productivity/supply chains for woodland products**
- e) Providing better information on market prices and opportunities
- f) Training to increase the skills capacity in agricultural workers
- g) Facilitating collaborative working between woodland owners
- h) Developing options for private investment for ecosystem services that drive woodland management**
- i) Other - please specify in no more than 25 words

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If you have any questions relating to this consultation and the REA's response please contact Sam Tickle at stickle@r-e-a.net