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**The National Association for
Areas of Outstanding Natural Beauty**

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Q 16. What role could the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover? (Maximum 150 word response)

Trees, woodland and hedges are key features of most landscapes and settlements in AONBs, and most have the capacity to accommodate more trees. The characteristic type, pattern, scale and overall number of trees varies according to the type of landscape and its specific geographical location.

AONBs are committed to creating 36,000ha of new woodland by 2030 in the Colchester Declaration with a track record of developing local initiatives with farmers and landowners and engaging local people.

With appropriate resources and the new ELM scheme, AONBs are in an excellent position to contribute to delivery of the England Tree Strategy whilst conserving and enhancing natural beauty through statutory management plans. They offer a unique solution to tackling environmental challenges working with local stakeholders landscape-scale approach through statutory management plans.

Considering 'right tree in the right place for the right reason with the right management' is essential to planting in protected landscapes.

1.0 England Tree Strategy : Response of National Association of Areas of Outstanding Natural Beauty

The National Association of Areas of Outstanding Natural Beauty (NAAONB) is the collective voice of the AONB Partnerships and Conservation Boards and represents the AONB Network on issues of strategic national importance. We welcome this opportunity to contribute to the England Tree Strategy. We recognise the many benefits of trees and woodland and the management of woodlands and forestry for multiple purposes. AONBs are enthusiastic about the opportunities that this strategy

would present. We already work through our management plans which provide useful tools to develop a partnership approach and achieve consensus. Within National Landscapes we see landscape character as the framework for integrated planning and design of new woodland and tree planting to ensure that new and existing woodlands and trees contribute to creating resilient, multi-functional landscapes

1.1 Creating space for nature: The Landscapes Review

The value of AONBs with respect to nature recovery has been recognised by the 2019 Landscapes Review [Glover Report]:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf

Proposal 3 is relevant : *'Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration). Their implementation must be backed up by stronger status in law.'*

1.2 The Colchester Declaration

AONBs have taken up the challenge to address the 25 Year Environment Plan and assist with the development of the Government's Nature Recovery Network. The potential for AONBs to positively contribute to ambitious targets in these areas was announced at the NAAONB's Landscapes for Life Conference in July 2019, where the Colchester Declaration was made:

https://landscapesforlife.org.uk/application/files/7815/6326/2583/The_Colchester_Declaration.pdf

Through the Colchester Declaration AONBs are committed to creating 36,000ha of new woodland by 2030

2.0 A broader partnership approach that encompasses nature recovery

Building on existing practice, we propose to explore how mapping, and local partnerships and strategies, can identify the best and most appropriate areas for new trees and woodland, including in protected landscapes such as National Parks. This work should be at a landscape-scale which considers woodland creation alongside wider objectives for those landscapes; such as supporting the rural economy, recovering nature, and improving the quality of landscapes. As a result the partnerships that develop these plans might include representatives from Local Enterprise Partnerships, County Councils, National Park Authorities and Local Nature Partnerships.(England Tree Strategy)

1. The NAAONB supports a partnership approach. We note that National Park Authorities have been included in this list. AONBs are also existing partnership around which action can coalesce to ensure planting the right tree in the right place for the right reason. Although we recognise that many AONBs lack the resources that National Parks have, there are examples of good collaborative practice. We have worked with our colleagues in the National Parks over the summer in meetings convened by National Parks

England and have much in common as the wider family of National Landscapes.

2. For example, the three AONBs in the Northern Uplands: Nidderdale, North Pennines and the Forest of Bowland have worked alongside the two National Parks of the Yorkshire Dales & Northumberland to produce valuable woodland opportunity mapping as part of a broader Natural Capital Investment Plan together as part of the Northern Upland Chain Local Nature Partnership
<http://www.nuclnp.org.uk/wp-content/uploads/2016/03/North-Pen-Woodland-6pp-Brochure-AW-10.pdf>

3.0 A wider- partnership approach: *recognising other habitats and avoiding costly mistakes*

1. We see the partnership approach within the strategy as essential, but recommend that it is defined more broadly to encompass **nature recovery**. Specifically the strategy needs to be co-ordinated alongside the Nature Recovery Network and the evolving Peatland Strategy.
2. No site is a 'blank sheet of paper'; even what may appear low nature value sites can be home to some of our rarest species that can have a limited ecological niche or has the potential a high quality habitat such as grassland or heathland and so it is with woodland creation. There have been notable mistakes made that have led to the loss of irreplaceable habitats including species-rich grassland, heathland and blanket bog. There are also examples where woodland creation has severed existing grassland corridors and prevented opportunities for creating new links and networks. Even looking at climate change alone; whilst there is an undoubted benefit in woodland creation, we should not ignore the climate mitigation benefits of other land uses or other land management practice. For example, the carbon sequestration of active blanket bog or salt marsh or indeed the potential to de-intensify existing pasture to get the additional benefit of improved biodiversity and carbon capture.
3. When scoping woodland creation and tree planting there is a need to consider the need to maximise **environmental gain** in its widest possible sense; that draws upon the natural capital approach and includes the whole range of ecosystem services, whilst not ignoring the cultural services that draw support for our work from the public.
4. AONBs, through their discrete spatial designations, their diverse partnerships and their broad management plans (encapsulating cultural, ecological, social and economic elements of landscape character) are in a unique position to take forward a partnership approach. However, there is a risk in too narrowly defining the issue as one that is solely about woodland. An approach could include woodland but might also be defined more broadly to encompass nature recovery (and therefore reduce duplication and draw upon other professionals such as landscape architects, ecologists and hydrologists). As

such, a body can consider broader landscape issues in their wider sense (see below) where different data sources can be pooled to avoid damage to other important habitats whether these are species-rich grassland or blanket bog. We would welcome to work with colleagues in the forestry Commission to share local knowledge and consider sensitive sites and species within designated landscapes.

4.0 Natural regeneration: a powerful driving force for adaptation

'Establish trees in a way that minimises excessive plastic use balancing the demands for sustainable food with numerous other demands such as trees, nature recovery, and peat restoration. Support natural processes where it is possible to realise faster carbon storage and biodiversity gains, as well as a variety of planting approaches' (England Tree Strategy)

1. We see England's Tree Strategy as important in creating space for nature and agree with the need to consider different ways of achieving establishment including (managed) natural regeneration. Our concern is that in the clearly articulated need for action that other opportunities to create better environmental outcomes are neglected. Traditional woodland creation ('trees and tubes') certainly has its place and can deliver immediate impact, however a longer term natural regeneration approach can reduce both landscape impacts; reduce the risk of importing disease and non-natives and maximise ecological benefits in some of the more sensitive protected landscapes if planned for. Indeed recent interest in 'rewilding' has shown there is an appetite for new approaches amongst wider public.
2. Connectivity between woodland helps ensure resilience of species to climate change through movement across the landscape; the consultation focusses on the resilience of the trees but there is also the potential for connectivity of other flora and fauna in the context of a Nature Recovery Network.
3. We note that 'using a natural capital' approach timber values are about 8% of the benefits provided, yet there is perhaps a 'forestry' bias running through the strategy that focuses on timber and the forestry trades and professions. Other tree-focused habitats can provide many of the benefits of woodland alongside potentially greater biodiversity benefits (such as edge habitats, scrub and wood pasture) or natural flood management benefits (such as willow carr or wet woodland). Extending grant aid down to these lower density planting, more akin to the 30% cover which is the actual original definition of 'Forest' (think New Forest, Ashdown Forest, etc) would encourage more land managers to plant trees, because the agricultural use would not be stopped completely and encourage the edge habitats and blended habitats that better support nature recovery.
4. 'Agroforestry' should be broadened from plantations replacing crops to embrace individual trees planted in pasture fields can significantly enhance both landscape and biodiversity value.
5. We recognise the risk to our existing tree stock and plant health issues. The strategy recognises the risk associated by ash dieback but perhaps not the

true scale of the impact. For example, the ash is the most common tree in the Kent Downs AONB. This landscape is now at significant risk. The AONB has used the cultural response to highlight the extent of the loss.

<https://www.kentdowns.org.uk/our-projects/the-ash-project/>

6. Many of these challenges require the input from many professionals, volunteers and landowners outside the immediate forestry profession. For example, developing the kind of social forestry projects championed by AONBs (see below).

5.0 A landscape approach

1. The Strategy fails to acknowledge landscape as an underpinning and overarching concept that incorporates the many complex social, economic and ecological drivers within which woodland planting and management inevitably sit.
2. The 'landscape' approach embedded within the management of National Landscapes and articulated within management plans is a crucial element of what makes the AONB offer so important. . Landscape goes far beyond just amenity. The European Landscape Convention defines landscape as “ an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”
3. The importance of landscape context needs to be recognised in the Strategy in terms of landscape character, local landform, geology, soils and drainage conditions in fitting new woodland and trees appropriately into the landscape by providing structure, pattern, scale, and reflecting historic or cultural associations and traditions that also help to create local landscape character and a distinctive 'sense of place'.
4. This approach is the foundation for AONB Management Plans. Many AONBs and National Parks have delivered against woodland creation targets alongside other landscape restoration measures. For example, the starting point for visual enhancement has been a full landscape appraisal as part of the National Grid Landscape Enhancement Initiative.
<http://lei.nationalgrid.com/>
5. The Strategy should acknowledge not only the statutory Management Plans produced by protected landscapes but the investment in National Character Area profiles and their wider Strategic Environmental Objectives that has England-wide coverage. By taking this broader landscape view that goes beyond amenity and land-use fewer mistakes can be made. For example, a consideration of soils and woodland soils (an omission from the strategy) or the weighing up the costs and benefits of different habitat choices.

6.0 Recognising cultural landscapes and cultural capital

The strategy should recognise the value of cultural capital - the rich cultural and historical resource represented by landscapes.

6. The success of AONBs is in part due to the great popular support for our treasured landscapes. These are, at heart, cultural landscapes guided by human intervention over centuries. Some of these protected landscapes are precisely valued for the wide open views and rolling countryside that may not be able to accommodate significant planting without a fundamental shift away from its reason for designation. For example, pre-enclosure field patterns seen in many parts of the country. Here the management plan is key to understanding how woodlands can enhance this landscape sensitively.
7. Woodland is a key element of many landscapes and as generally uncultivated land with a rich history that goes beyond the lists of currently known archaeology. This historic environment is at risk through modern mechanised extraction.

7.0 Managing our woodlands and trees

1. We support the Strategy in its desire to bring about management of woodland that has been sadly neglected over recent years. There should be funding support that recognises the value of managing existing woodlands for their multiple public benefits. This regime needs the resources for follow up and, if necessary, enforcement. The management of existing woodland should be a priority to maximise the benefits of what we already have.
2. Where there are productive woodlands there needs to be increased effort to grow timber that can be used in construction and other long-term uses that will help to maximise the long term carbon fixation benefits of forestry.
3. Increasing tree cover across England cannot be considered without support for the wider infrastructure associated with its management, harvest, and its passage to market. This may mean greater directed support for forest industries, skills training, and incentives to promote the use of locally grown timber and wood in construction, fuel, charcoal, hurdles etc

8.0 NAAONB Social Forestry Pilot Project: *Changing the culture of woodland management*

1. Although social forestry outcomes are acknowledged in the Strategy more detail is required to bring about a step change in woodland management. Concepts such as Agroforestry are acknowledged within the report, but without mechanisms to change the perception of woodland management in England that embrace a genuine woodland culture, these may not be realised. Whilst the Strategy focuses on economic levers, the failings are as much about the failure to encourage and facilitate a 'culture' of woodland management within the land management sector.
2. In 2013 the NAAONB commissioned a report which identified social enterprise approaches as an increasingly important mechanism for delivering health and well-being benefits, environmental enhancement and economic outcomes.
https://landscapesforlife.org.uk/application/files/6415/6378/3952/Social_Forest_ry_Pilot_Project_-_Oct_2013.pdf

<https://www.thenews.coop/88467/sector/retail/areas-of-outstanding-national-beauty-team-up-with-wood-co-ops/>

3. Many of the solutions to woodland management where woodland is small and difficult to access are necessarily best built over time locally. Developing this woodland culture where landowners would require investment in local partnerships to develop local markets and the supply chain that makes woodland management viable. AONBs are in a good position to develop these relationships. Examples include:
 - Blackdown Hills AONB has supported [Neroche Woodlanders](#), a community benefit society founded to increase community participation in management of the public forest estate.
 - Dorset AONB is working closely with Axewoods Co-op and Prime Coppice Working Woodland to link volunteers and customers around woodland management the wood fuel market.
 - Arnside & Silverdale AONB is working with the [Coppice Co-op](#), a coppice workers co-op based in North Lancashire and South Cumbria. The AONB has part-funded the development of the co-operative's wood fuel business and regularly uses the Coppice Co-op as a contractor. <https://www.arnsidesilverdaleaonb.org.uk/what-we-do/projects/community-energy-project/>
4. Social enterprises are “triple bottom line” organisations, and have proved in a wide range of sectors that they can deliver these benefits both directly, or by supporting the operation of other economic factors.

9.0 Developing green and healthy places to live

5. Research carried out by the University of East Anglia and funded by Forest Research has identified the significant benefits from physical exercise in woodland including relieving high blood pressure and obesity, as well as mental symptoms of stress and depression¹.
6. There are concerns that new generations have become detached from nature in their everyday life. Yet outdoor play and learning is essential to children's health, development and well-being. This has been described as a nature deficit crisis.
7. To match the scale of this crisis will require resources that are probably beyond the England Tree Strategy. The Tree Strategy has real opportunities to address issues around obesity and yet will need to make tangible links between Clinical Commissioning Groups and Public Health England. This will require resources and capacity to deliver. For example, Forest Schools are part of an exciting new movement of nature-based communities, where trained practitioners nurture learner-led exploration and discovery, nurturing meaningful experiences for positive lifelong impacts. This initiative has often struggled when school budgets become limited.

¹ Henwood, K. (2001) Health & wellbeing : Tangible & Intangible Benefits of Woodland, University of East Anglia. Presentation to the The City in the Woods- the Future of Urban Trees in Britain.

10.0 Support for enhanced legislation

1. Currently land values can act as a barrier to the conversion of agricultural land to woodland, resulting in an apparent depreciation of a capital asset. This will need to be addressed before planting on this scale will be seen as a viable economic option for land managers.
2. Some AONB partnerships/Boards are consulted on woodland creation proposals by the Forestry Commission or Agents as part of EIA scoping. Consultation is essential and Woodland Creation Plans should be required (and shared with designated landscapes) even if not applying for grants; these should set out the objectives for planting, what is the driving motivation, the implications of planting, and a commitment to long term management.
3. EIA thresholds should remain as they are (2 hectares within AONBs and National Parks). Even the creation of small woodlands can be harmful to landscape, biodiversity etc.
4. We support the proposals to strengthen the Forestry Act and tightening the criteria for TPOs and ensuring compliance with the UK Forestry Standard. However, we recognise that such proposals need to be backed up with communication and enforcement. This will necessarily require additional resources to the relevant organisations.
5. There are areas of the Strategy that need to be considered very carefully in terms of their impact such as the support for woodland infrastructure (tracks can greatly impact a landscape and potentially increase surface water run-off) and the proposed reduction in time and resources associated with Environmental Impact Assessment Regulations.
6. We do support the need for training and vocational investment but there is an emphasis in the strategy that this is through forestry when there are many other professions that need to be engaged including ecologists and landscape architects. Indeed many current practitioners have come through vocational training and from other disciplines and this should be encouraged.

In summary we share the desire to increase woodland creation and protected areas are enthusiastic about the opportunities that this would present. We would work with others on the principles of the 'right tree, right place for the right reason'. We believe AONB Management Plans are vital to developing a partnership approach and achieving consensus within our areas.

On behalf of the National Association of AONBs

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