



Historic England

Historic England Response to the England Tree Strategy

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England welcomes the opportunity to comment on the current consultation.

General comments

1. We very much welcome references (p.7) in the section on Making Space for Nature to the importance of mechanisms such as the UKFS in ensuring that woodland creation does not diminish the value and significance of our heritage, and also recognition within the Minister of State's foreword of the cultural heritage value of England's forests. Woodlands are part of our biocultural heritage and a distinctive element of historic character which often contain archaeological evidence of earlier land use or relating to the creation, management and use of the woodland itself. New woodland may also provide a more benign form of land use for existing archaeology, particularly in intensively managed landscapes. We note, however, that the consultation questions do not specifically address how best to ensure that the significance and wider value of our heritage is recognised and appropriately reflected within planting schemes, in which context the UKFS is a key, but by no means the only mechanism. In this light – and in the interests of removing obstacles to new planting – Historic England would be particularly interested in exploring:
 - Regularisation and improved transparency in relation to the conditioning applied to heritage across all planting schemes;
 - Ensuring that heritage value is reflected in mapping the benefits and potential public goods arising from planting – primarily through natural capital accounting;
 - Using Historic Landscape Characterisation to identify opportunities for new planting to reinforce and enhance historic character and for the existing Public Forestry Estate to take the inherent heritage of these landscapes into account ;
 - The use of strategic survey to map the cultural heritage significance of landscapes likely to be the subject of large scale planting or afforestation projects in order to assist local authorities in responding to applications.



We think it vital that these issues and the fundamental recognition of woodland as a biocultural asset should be firmly established in the new Local Nature Recovery Strategies. Current schemes can often concentrate on achieving just one environmental objective to the detriment of achieving a broader range of outcomes and public value (eg. habitat creation within historic parkland failing to recognise their cultural and heritage significance and associated public value).

2. In the context of the biocultural value of England's trees and woodlands, we also note that the Tree Council is embarking on renewing its campaign for 'Green Monument' status for veteran trees. In the Historic England response to 'Protecting and enhancing England's trees and woodlands - December 2018' <https://historicengland.org.uk/content/docs/consultations/response-protecting-enhancing-englands-trees-woodlands-consultation-feb19/> we noted 'TPOs and Conservation Area designations already address the amenity value of notable trees but we have lacked this specific recognition of trees of special historic or cultural significance. It is appropriate these special trees are identified and consultation could prove invaluable in gleaning information about individual trees or groups of trees. However it should be noted that there is a paucity of research about our street tree heritage, its history and significance'. Should the Government decide to pursue "Green Monument" status, we remain willing to assist in helping to define criteria.
3. We support the 'right tree, right place' principle, but in a historic context, would challenge the assumption that only British native species are necessarily appropriate. Historic parks and gardens in particular have made widespread use of novel species, while in landscapes such as the Lake District National Park/World Heritage Site, the Victorian coniferous plantations have become such an accepted and distinctive element of the landscape that many visitors assume that they are natural. There is still a lot to do in respect of furthering public understanding of trees and treescapes, and the necessity for their routine management and care (including sometimes contentious issues such as the control of squirrels and deer). In urban areas there has been a growing trend for planting small, short lived trees such as birches whereas it might be more sustainable to make the additional space for planting large forest species
4. Pests and diseases associated with climate change pose a very real and increasing threat to our park and designed landscape heritage. While the England Tree Strategy understandably focuses on forest trees, we would also urge the necessity to track and understand threats to amenity and hedgerow trees too.
5. Given the experiences and involvement of our staff in the establishment of community forests in the 1980s and 90s, we welcome renewed recognition of the value of this type of environmental planning. The community forest idea uses the historic forest concept of a range of land uses and activities within a framework of



Historic England

trees, and while we therefore very much support the ground-up, community-driven approach, it is vital that such partnerships include representation from the historic environment sector from the very beginning. Involving the sector throughout, rather than merely seeking advice at the scheme application stage, will help to and ensure that the value and potential of heritage is fully reflected and realised within the schemes. In our experience, talking about historic character, context and sense of place can be a useful vehicle for beginning dialogue with communities about wider environment aims and objectives, landscape change and also foster an increased sense of empowerment and ownership. In a very practical sense, early involvement of the historic environment sector – principally local authority curators, but also Historic England – enables a more strategic response and avoids last minute obstacles.

6. Tree and woodland strategies need to be very long term, but we would emphasise that in our experience, tree establishment and regular management is as important as planting. For this reason we fear that a significant proportion of the tree planting over the last 30 years will not provide the returns either possible or intended (eg. timber, amenity, habitats or carbon sequestration) because the trees have not been maintained (eg. saplings have been strangled/distorted by tree shelters, damaged by squirrels and deer, not thinned out etc) and are failing to grow into maturity. We think it important therefore that the strategy and the schemes that will help to deliver it make provision for ongoing management if its laudable aims are to be properly realised.

Background and Purpose

1. Would you like your response to be treated as confidential?

No

2. What is your name?

Dr Vince Holyoak

3. What is your email address?

vince.holyoak@historicengland.org.uk

4. Please tell us about yourself (select one option)

Other (please specify in no more than 25 words) – we are a non-departmental public body sponsored by the Department for Digital, Culture, Media and Sport (DCMS).



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5. What is your organisation?

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Expanding and connecting our trees and woodland

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

(a) consolidating current range of wood creation grants into one – so that a whole estate/landscape scale approach can be planned and rolled out.

(e) provide a clear explanation and guarantees of how trees planted between now and 2024 will be considered under ELMS.

Other comments: If there is to be private investment, there is a need to ensure read-across – specifically that mechanisms for planting schemes are well-designed and complement other programmes.

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

(l) Other – Provide assurance about long term incentives for good quality tree planting schemes, establishment and maintenance.

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?

We have no comments, other than to say that it is important that the cultural and heritage services that woodlands provide, and the opportunities they can generate are recognised in woodland creation.

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

(c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills.

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

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



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(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.

(o) Other – please specify in no more than 25 words in the box below.

We strongly support any measures that improve the establishment and growth of quality trees. We also support UK sourced and grown trees but would stress that these will not meet all needs, and that it will be necessary to grow or import many more species for specific uses e.g. historic parks and gardens and broaden palette of species as part of climate change adaptation. We also suggest that woodland creation be better integrated within the planning system – incentivised schemes will not be the only mechanism for creating new woodland.

10. Which actions would be most effective in addressing the non-financial barriers to the creation of new woodland? (select up to three options):

(c) Providing land managers with better access to expert advice on woodland creation and forestry knowledge and skills

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

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

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

(d) Implementing a joint approach to land management across central government and its agencies including those responsible for protecting landscapes. And Historic England needs to be included!

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

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

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

Natural processes – including uncontrolled scrub and tree growth – are currently the biggest risk factor for Scheduled Monuments, with 41% of monuments on the Heritage at Risk Register (<https://historicengland.org.uk/advice/heritage-at-risk/archaeology/scheduled-monuments-at-risk/>), an official statistic, affected by this



issue. In this context we would merely make the point that natural establishment is not appropriate everywhere.

14. Are there any other actions - beyond the options you have already selected or submitted - that would help land owners and managers to transform the level of woodland creation and increase the number of non-woodland trees in England? (Maximum 100 words):

We have no comments.

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):

(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.

16. What role could the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs) play in increasing woodland cover? (Maximum 100 word response):

As above, we strongly believe that a joint approach to woodland creation is needed across government, to ensure that policy delivery is suitably joined-up. This extends to the protected landscapes family, who have to balance sometimes competing environmental demands.

Protecting and improving our woodlands

17. Which actions would be most effective to increase protection for trees and woodland from unsustainable management? (select a maximum of three options):

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

18. Which actions would best help the planning system support better protection and enhancement of the ancient and wider woodland environment and trees? (select a maximum of two options):

(a) Providing support to fully complete revision of the Ancient Woodland Inventory.

(h) Other – please specify in no more than 25 words in the box below.



Improved protection for veteran trees to ensure their conservation. Recognition of woodlands as biocultural heritage and as part and parcel of complex ecosystems, e.g. traditional pastoral landscapes

19. What actions would be most effective in reducing the use of plastics in forestry? (select one option):

(a) Providing support for land managers for deer control and fencing.

(e) Other - please specify.

We would suggest extending support for land managers for deer control and fencing to cover all pest control.

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

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

21. Which actions would be most effective at overcoming the financial barriers to woodland management? (select a maximum of three options):

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

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.

(f) Other - please specify in no more than 25 words in the box below:

We think that (a) applies to a growing number of owners.

23. Which actions would be most effective at overcoming the non-financial barriers to woodland management? (select a maximum of three options):

(a) Providing user friendly woodland management services aimed at 'non-forester' woodland owners.

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

(c) Placing a legal obligation on all land owners to manage their woodland.



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(d) Other - please specify in no more than 25 words in the box below:

We recognise, however, that (c) would be a challenge for many owners.

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

(c) Placing a legal obligation on all land owners to manage their woodland.

26. If you own and/or manage woodland(s) that is a Site of Special Scientific Interest (SSSI) what actions would help you most to bring that woodland(s) into management? (Maximum 100 word response):

As for our response to question 13, this also needs to extend to Scheduled Monuments and other designated heritage assets. In this context we would make the point that the percentage of Scheduled Monuments deemed to be “at risk” is lower for those falling within the public forestry estate than for any other large land owner, private or public. The proactive use of management plans has been a significant factor in this remarkable achievement – we believe that this approach should be extended to heritage more widely.

There is also a correlation between woodland SSSIs and some designated assets on the National Heritage List for England. This is especially the case for parklands and ancient woodlands. For historic parkland we would encourage funding conservation management plans to develop a better understanding of the site’s significance and long term management needs.

27. Which of the following actions would be most effective in improving plant biosecurity across England’s trees and woodlands? (pick a maximum of two):

(b) Providing better best practice guidance and information about biosecurity.

(c) Introducing conditions which require suppliers to meet the ‘Plant Healthy’ management standard for those public sector contracts and government grants that relate to tree planting and stocking.

(h) Other - please specify in no more than 25 words in the box below:

If introduced Historic England (which is a member of Defra’s Plant Health Advisory Forum) recognises that it too would have to adopt these standards in respect of its own grant aid.



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 a maximum of three options):

(a) Bringing woods into management to enhance their future resilience to climate change and secure greenhouse gas emissions reduction in other sectors.

(f) Strengthening the protection of all woodland to reduce greenhouse gas emissions from deforestation.

All the other options have potential harmful impacts for the historic environment without careful planning.

29. Which of these actions would be most effective in reducing damage to trees and woodlands caused by deer? (select a maximum of two options):

(a) Develop a national policy on sustainable deer management and control measures.

(b) Facilitate landscape control by land managers.

30. Which of these actions would be most effective in reducing the damage to trees and woodlands caused by grey squirrels? (select a maximum of two options):

(c) Providing incentives for the management of grey squirrel.

(d) Other – Public awareness campaign about need for pest controls and the role of the public.

Engaging people with trees and woodland

31. Are any of the following significant barriers to securing and maintaining street trees? (select up to three options):

(b) Practical challenges in terms of street design, planting requirements and compatibility with other infrastructure provision. This includes historic buildings/settings.

(d) The skills and resources needed to deliver new street trees, including funding for planting. Historic England is a member of the Trees and Design Action Group although we haven't been active for the last 5 years because of staff resource constraints.

(e) The funding and skills for ongoing maintenance of street trees over their lifetime.

32. How could government overcome the barriers to securing and maintaining street trees you have identified in question 31? (Maximum 100 word response):



Support for the Trees and Design Action Group www.tdag.org.uk to raise awareness amongst the construction sector and provide guidance and training.

33. Which of these actions would be most effective in increasing the number/coverage of trees in and around urban areas? (rank the following options in order of preference):

(a) Promotion through national policy including recognition that trees and woodlands are key components of green infrastructure, with equal status to other green and built infrastructure.

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

(h) Recognising trees and woodlands as key components of green infrastructure, with equal status to green and built infrastructure.

(f) Adopting Local Tree and Woodland Strategies as supplementary planning documents. Such a requirement hopefully would address (a), (b), (c), (d) and (e).

(g) Strengthening technical expertise in tree and woodland management on local authorities.

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):

(e) Providing better support for community forests in areas of greatest need.

The options seem too specific against the breadth of the question.

36. Which actions by government would be most effective in addressing barriers to peoples' access to trees and woodlands? (rank the following options in order of preference):

(c) Creating new accessible woodlands in and around towns and cities. So long as not harmful to historic environment.

(f) Improving the quality of access by investing in infrastructure.

37. Which of the following do you most value about trees and woodland? (select up to two options):



(g) As a feature of towns and cities.

(i) Other – please specify in no more than 25 words in the box below:

Trees and woodlands are key biocultural features within our urban and rural landscapes. Many are of historic or cultural interest in their own right, and add to sense of place and local character and distinctiveness. Wherever possible, we advocate new planting being used to reinforce or enhance historic landscape character. Existing woods contain evidence of past management (pollarding, coppicing etc) and also archaeological features associated with past use and exploitation (eg. charcoal production sites).

38. Which of these actions would best address the funding challenge for the planting and on-going maintenance of trees in urban areas? (pick up to two options):

(a) Making central funding available to supplement private finance for establishing trees in existing developments.

(c) Using planning levers to raise funds for on-going maintenance.

Supporting the economy

39. What could the England Tree Strategy do to encourage the use of timber in construction? (select up to two options):

(h) Other.

We think that it is crucial – particularly in a post-Brexit context, and in the broader interests of sustainability – to ensure the supply of British and imported timber building materials for historic building and other conservation repairs.

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

We do not believe that agro forestry/energy crops should not be treated as afforestation so none of the options are suitable.

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

Perhaps use (g) Other – to highlight the potential damage energy forestry might do to historic landscapes?

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



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(a) Clarifying the regulation of agroforestry.

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.

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

(i) Other – Historic environment advisers.

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

We have no comments.