

## AA ETS briefing note

September 8<sup>th</sup>, 2020

*The Arboricultural Association (AA) response to the England Tree Strategy (ETS) Consultation document is in three parts:*

- *A covering letter to Lord Goldsmith.*
- *AA ETS questionnaire answers.*
- *AA ETS briefing note.*

*This document contains the briefing note. It should be read in conjunction with the document AA ETS questionnaire answers and the covering letter (both dated September 8<sup>th</sup>) which provide additional detail and commentary about the questions and the ETS consultation document itself.*

*The purpose of the briefing note is to explore in greater depth the answers to the consultation questions where it was not possible to fully respond through the multiple choice format, and to address some of the key issues within the text of the consultation document.*

*Without paragraph numbers it is difficult to link up comments to the relevant parts of the text. The below comments, including comments on the questions for each section, are grouped under the headings from the document.*

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### **Introduction**

*Tree planting.* Trees need to be recognised as assets. One way to do this is through quantifying those benefits which it is possible to quantify as part of an ecosystem services assessment. Understanding what is already in place is an essential step, and through knowing the existing situation it is possible to develop effective management and planting programmes.

All planting initiatives should be strategized, assessed and prioritised to ensure that maximum public good is achieved – whilst taking into account the principles of green equity and community engagement. Priorities will vary between communities with differing priorities and needs. This will influence many elements of the planting process including location, species selection and size.

Resilience to climate change and imported pests and diseases is also critical. Diversity within tree populations is essential and in urban areas at least the drive for ‘native only’ planting must be resisted.

The concept of ‘right tree, right place’ still stands, although it is often overused and frequently misunderstood, with some failing to appreciate the importance of professional arboriculturists in deciding which is the right tree and which is the right place. The drive for mass planting – an inevitable consequence of ever-escalating tree planting targets – risks ignoring the nuances of location, species,

provenance, quality, establishment and long-term maintenance etc. and focuses only on the numbers going into the ground.

*Nursery production.* The pledge to increase nursery production is welcome but overlooks some of the complexities behind the ambition. The timescale to produce a 12-14cm tree for planting in an urban area is a minimum of five years, and the larger the tree required, the longer the process takes. In addition, the amount of space needed by the nursery will increase with the additional trees it is producing – this could carry considerable costs. Such an investment by a private company would be foolish when it is dependent on fluctuating demand often driven by the erratic allocation of public money. This is compounded by the threat of biosecurity – an outbreak of *Xylella* close to a production nursery could result in that nursery being closed down, even if it were itself clean.

Even if nursery production could be increased there are certain factors which are unknown. There are no available figures to quantify the number of large trees, 12-14cm and above, that are imported into the UK each year and therefore no knowledge of the gap which increased UK production would have to fill. Over-production both here and in Europe will, as it has done in the past, result in the unit price of trees falling dramatically and nurseries then struggling to make a profit. The question of VAT in tree sales is never addressed – removing VAT from trees would cost very little but would incentivise the market.

Here, as in the rest of the document, there is no distinction made between nurseries producing for forestry and those producing for urban tree planting. There is a vast difference between growing a relatively narrow selection of species which will be planted out as seedlings for forestry, against the huge diversity of species required for planting in urban areas at a much larger size.

*The table.* It is difficult to understand why urban trees are confined only to the ‘engaging’ heading in the table (and the document as a whole), when it seems that they should be featured under all of the columns. It seems unquestionable that urban trees are a key part of ‘expanding and connecting’, ‘protecting and improving’ and ‘supporting the economy.’ Again, by conflating completely separate industries and environments because they all deal with trees in one way or another, the entire arboricultural industry is marginalised.

### **Expanding and connecting**

*Ambition.* Canopy cover is just one metric and is often used without a clear understanding of what it means or how long it takes to achieve canopy cover gains through tree planting. The importance of protecting and retaining existing trees is often overlooked. When the separate industries of arboriculture and forestry are conflated in this way the targets and figures become meaningless, for example in the target to plant between 30,000 and 50,000 hectares of trees per year. Urban trees are completely lost within these ambitions.

### **Creating space for nature**

*Nature Recovery Fund.* It is positive to see that £25 million is being set aside for a Nature Recovery Fund and that the ambition is “to allow nature to thrive everywhere.” It would be useful to understand what percentage of this fund is being apportioned to trees and nature in urban areas.

### **Expanding tree and woodland cover on public land**

*The public forest estate.* It is a shame to see ‘public forest estate’ defined in such narrow terms. This estate is not just the 253,000+ hectares in England which is managed by Forestry England – it must surely also be understood to include all of the trees owned and managed by Local Authorities as well. Once again, the focus is entirely on forestry and woodland in public ownership and there is no attempt to understand, quantify or value the public tree estate in the urban realm.

*Planting trees on other public land.* This is an opportunity for central government to support those Local Authorities which do not yet have a tree strategy to create one, through the provision of additional funding, expertise and resources as and where necessary.

### **Supplying the trees we need to plant and assuring their biosecurity**

*Nurseries.* Some of the issues around nursery production have been explored in the comments relating to the introduction above. However, an additional problem is identified here through the use of the “100 million trees each year” produced by UK nurseries for forestry. Where is the equivalent information for urban trees? The assumption is made that a significant increase in capacity is required, but no evidence or figures are given, much less any real strategy to make this ambition a reality. Forestry and arboriculture are completely separate industries and, as might be imagined, the tree production requirements and specifications are completely separate as well.

*Plant Healthy Assurance Scheme.* This initiative is certainly welcomed and should be supported, but the impression is given in the document that the scheme is fully functional already, when in fact only one nursery in the UK has actually been audited and received accreditation.

### **Protecting and improving our trees and woodlands**

*Tree felling.* The document states that “the vast majority of tree felling is overseen by the Forestry Commission.” This may well be true in terms of sheer numbers and timber volumes when combining forestry and urban trees, but it is a statement unhelpful to arboriculture. Tree removal in urban areas is going to be for a different purpose and will quite likely have higher impact and greater impact on, and interest from, the general public – but in the vast majority of cases won’t involve the FC at all.

*Development.* It would help to prevent the pre-emptive clearance of habitats and trees by developers if more Local Authorities had good records and databases showing what is present in their areas. It is also concerning that the commitment made here in this document might conflict with the relaxation of planning regulations as proposed elsewhere by the government.

### **Preparing for our future climate**

Only woodlands are mentioned here as being affected by climate change when it is of course all trees, including those in urban areas. Reference is made here to native trees and the particular problems they may face; this is therefore perhaps an opportunity to make clear that in urban situations there should be no place for the ‘native v non-native’ debate and that trees must be selected and planted in accordance with the principles of right tree, right place, with the right aftercare and with appropriate professional engagement from arboriculturists to determine what is ‘right’ in this context in any given situation. Diversifying away from native trees is essential if we are to reduce the potential impacts of climate change and tree pests and diseases.

### **Protecting plant health**

The sort of trees typically planted by Local Authorities as street trees (12-14cm and above) seem to be written off here as “*the ‘larger’ standards often used for landscaping*”. ‘Landscaping’ here is seemingly presented as a synonym for all tree work other than forestry and woodland management. Yet again, arboriculture and urban trees are disregarded.

### **Regulation**

*Tree Preservation Orders.* A discussion needs to be had about how the current system works and if there are any ways in which it could be improved – for example, should more of the social, environmental and economic benefits of trees be considered than just ‘amenity’ in the creation of new TPOs? More information would also be useful. How many trees across the UK are protected by TPOs, what ecosystem services are those trees providing and what support are Local Authorities being provided with in order to manage this critical national resource?

### **Additional comments on the questions in this section**

Q27. Some of these options link together and some are not really comparable against each other. For example, option A seems like an aim, but C and D seem more like ways in which that aim will be achieved.

### **Engaging people with trees and woodland**

The statement “*we need to find ways to better value, plant and protect trees*” is rather frustrating. One view of this is that the right ways are there already but are either ignored, or the people who are employed to implement and enforce them are not properly funded and supported. Properly funding and supporting the existing model is potentially a better solution than creating a whole new model.

It is an unavoidable fact that many of the funding challenges associated with planting and maintaining urban trees have been created as a direct result of many years of government austerity and underfunding of the Local Authorities who care for our urban forests.

### **Street trees**

The commitment to ensure that all new streets are lined with trees is of course to be welcomed, but a far more common – and greater – challenge is when dealing with existing streets. More support is needed both to retrofit new trees into these existing streets, and to protect those existing street trees which are already there.

*“The planting and longevity of street trees requires appropriate skills and resources, from early planning, through effective planting and maintenance.”* The word ‘arboriculture’ is notably absent from the entire document, but if there is anywhere it deserves to be mentioned, it is here. This is, after all, the industry which covers all of the aspects mentioned as being required for urban tree care.

*“We want to ensure that government, communities and businesses can come together”* to achieve the recommendations relating to trees – hopefully, this list does not exclude the arboricultural industry; urban tree professionals and experts must be regarded as the key part of this puzzle.

### **Additional comments on the questions in this section**

Q33. An additional point which might usefully be raised here is the lack of education and awareness in other disciplines about the importance of trees in urban areas, and the fact that in many cases there are detailed tree plans and policies in metropolitan, borough and district councils and national parks which give trees a special status in the planning realm. Training must be given to professionals engaged in planning and construction activities at all levels, to realise the special place that trees have in the urban and rural landscape. Whilst they might appear robust, they can be easily damaged by activities that have their origins in rumour, misinformation or lack of understanding. The unique services provided free by trees can be lost through these activities.

Q34. None of these options seem to particularly answer the question being asked.

Q35. This question appears to be referring predominantly to woodlands and is another example of the dangers of trying to combine all trees in the country under one 'trees' heading – it is very difficult to give useful responses.

Q36. This question about access to green space should have been the perfect opportunity to explore issues around green equity and fair and equal access for all, but as there is no 'other' option this is not possible. Green equity is a very important topic – we know that trees bring benefits, but who is receiving those benefits? And the answer to increasing green equity is not simply through increasing tree planting numbers in deprived areas; there are wider issues around structural representation and community engagement etc. which must also be addressed.

Q37. It was a real shock to see a question of this nature included in this consultation – it feels more like something which would be included in an arboricultural student survey. Unfortunately, this really demonstrates the lack of understanding about trees which runs through the whole document. The thing one most values about a tree will vary greatly depending on where that tree is located, as well as many other factors. The fact that 'health' wasn't included as an option was also extremely concerning.

### **Supporting the economy**

*Workforce.* It is really positive to see acknowledgement of the workforce and skills shortage in forestry. However, it must be recognised that this is not a problem unique to forestry and that arboriculture is also a "*diverse and lifelong career*" etc. and is in the same position. It will be even more difficult for us to address this issue in arboriculture if it is not even mentioned in government documents such as this.