

The Rt Hon Lord Goldsmith
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
Westminster
London
SW1P 4DF

September 8th, 2020

Dear Lord Goldsmith,

The Arboricultural Association commends the government for its ambition to recognise the importance of trees through the England Tree Strategy. We are committed to working with you to make this initiative a success and we welcome the invitation to be involved in this consultation, which will be used to inform the production of the new Strategy.

We acknowledge the scale of the task at hand and admire the ambition it shows – it is no small feat to write an entire Strategy from scratch between mid-September, when the consultation closes, and the end of the year, by which time the government has promised to publish the completed work. We wish you every success in this endeavour.

We request that, once completed, a draft of the actual England Tree Strategy document will be made available to us for comment on before it is finalised and published. We believe that this is absolutely essential in order to ensure that the final document is something which the arboricultural industry feels it can support, promote and implement.

The purpose of this letter is to raise two key concerns about the document and process.

1. The consultation framework is not fit for purpose.

As mentioned in our letter of July 22nd the format of the consultation – multiple choice questions with little space for additional comment – does not allow the depth and nuance required in the responses. This is particularly concerning because we are essentially being invited to comment in advance about a document which has not yet been written. If this document is to be a success then the concerns of industry must be heeded, and this is not currently possible within the consultation framework which has been provided.

The limitations of the consultation are well-illustrated through Q37 - *Which of the following do you most value about trees and woodland? (select up to two options)*. This question suggests a worrying lack of understanding about trees in general and ecosystem services in particular. The aspect of trees that one 'most values' will be informed entirely on the specific circumstances – is the tree in a street, a park, a woodland or a forest? How old is it? Was it planted for amenity, for shade, for habitat or for timber production? The question is utterly meaningless without context and we are unsure how it could ever provide useful evidence for the production of the Strategy.

2. The importance of urban trees is not acknowledged.

Whilst it is of course true that both arboriculture and forestry deal with trees, it must be recognised and understood that they are two completely separate industries with considerable differences at every stage and in every area. A strategy seeking to combine under one umbrella all trees, regardless of whether they are in an urban area, a woodland or a commercial forest is potentially detrimental to the interests of all.

The problems associated with this one-size-fits-all approach are demonstrated in every section of the document, as urban trees are consistently relegated in importance as compared to commercial forestry and mass tree planting initiatives. Some 83% of the population of England live in urban areas, and urban trees perform a number of key functions which undoubtedly meet all four of the stated ambitions ('expanding and connecting', 'protecting and improving', 'engaging' and 'supporting') – however they are only included under 'engaging' and are given only a few brief pages.

If urban trees are to be given the recognition they deserve – and if the four ambitions are truly to be met – then far more attention needs to be paid to them. One solution would be to rename this document to reflect what it is – an England Forestry and Woodland Strategy – and then develop a standalone England Urban Tree Strategy with input from the relevant industry groups. Alternatively, if this is to remain an England Tree Strategy, then it needs to be structured and written from a perspective where urban trees are acknowledged as being equally as important, albeit in different ways and for different reasons, from trees in woodlands and forests.

The Arboricultural Association has completed the consultation questionnaire and has encouraged our members to do the same. We have also produced an accompanying briefing note outlining comments about the text of the document which it was not possible to communicate through the consultation framework provided.

We are committed to working with government to ensure that the England Tree Strategy is a success and that this opportunity is not lost. It is hoped that through this letter and the associated briefing note, as well as through continued dialogue with Defra and our industry partners, we will be able to start working together to achieve this aim.

Please note that this letter, the accompanying briefing note and consultation questionnaire responses have been shared with our membership and placed into the public domain.

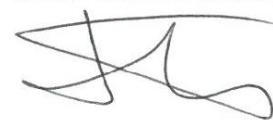
Yours sincerely,



Michelle Ryan, Chair of Trustees



Stewart Wardrop, CEO



John Parker, Technical Director