



Department  
for Environment  
Food & Rural Affairs

# England Tree Strategy Consultation

June 2020

**Written response from the Trees and Design Action Group ([www.tdag.org.uk](http://www.tdag.org.uk))**



The Trees and Design Action Group (TDAG) was founded in 2007 as a not for profit and apolitical collaborative forum to promote best practice in the planning, planting and management of urban trees. TDAG was incorporated as a charitable trust in 2013.

The TDAG model was at the time of creation, and remains today, a unique and effective world leading model.

The group shares the collective vision that the location of trees, and all the benefits they bring, can be secured for future generations through strong collaboration in the planning, design, construction and management of our urban infrastructure and spaces.

The uniqueness of TDAG is that, as an organization, it crosses the boundaries associated with professional disciplines engaging with a wide range of professionals who have an interest in trees and the built environment. They include leading built environment practitioners and developers as well as organisations such as the Forestry Commission, the Woodland Trust, the Tree Council and the Community Forests. No other built environment organization in the UK provides such an effective forum or communicates with such a wide range of disciplines.

The key strength of TDAG is that those taking part in TDAG's work can do so in TDAG's name i.e. a neutral organisation with no commercial agenda influencing its guidance, proposals or actions.

TDAG has produced a series of good practice documents especially *Trees in the Townscape: A Guide for Decision Makers*; *Trees in Hard Landscapes: a guide for delivery* and is currently developing *Trees, Planning and Development: A guide for delivery* to complete a trio of

documents providing a very broad understanding about the urban forest. In addition we have produced in association with Dr Andrew Hirons at Myerscough College with support from NERC *Tree Species Selection for Green Infrastructure: a guide for specifiers* and some short guidance documents *First Steps in Urban Air Quality* and *First Steps in Valuing Trees and Green Infrastructure*. We have several other short guidance documents in development including *The Performance Gap* on why tree planting so often fails in terms of long term delivery; *Trees and Utilities* etc.

## Consultation Acknowledgements -

Other written input from the following organisations and groups has and will provide valuable points of reference include:

- Beavers Trust
- Campaign to Protect Rural England
- ConFor
- County and Land Business Association
- Forestry Climate Change Working Group
- Grown in Britain
- National Trust
- Roots to Prosperity
- RSPB
- Sylva Foundation
- The Tree Council
- **Trees and Design Action Group: should be included here. It was TDAG that took the original proposal to Harry Studholme (FC) and Defra and also invited Jane Carlsen of the Urban FWAC to join the discussion and help formulate the first proposal.**
- Woodland Trust

# TDAG SUBMISSION

(19 pages)

The Trees and Design Action Group supported the letter organised by the Arboricultural Association and sent to Lord Goldsmith expressing concern about the present consultation document and its fitness for purpose. Others have also expressed concerns especially the reliance on multiple choice questions.

TDAG will not dwell on this, but, in welcoming the proposal for an England Tree Strategy, aims to offer a response which it trusts will be helpful in making this vital strategy as effective as possible.

In producing our response TDAG has liaised with the following organisations:

Institute of Chartered Foresters (ICF)

Arboricultural Association (AA)

Town and Country Planning Association (TCPA)

Royal Institution of Chartered Surveyors (RICS)

Royal Town Planning Institute (RTPI)

Urban Design Group (UDG)

Landscape Institute (LI)

Institution of Civil Engineers (ICE)

Society for the Environment (SocEnv)

Institute of Environmental Management and Assessment (IEMA)

Chartered Institutions of Water and Environmental Management (CIWEM)

Urban FWAC

The Mersey Forest

Trees for Cities

Woodland Trust

The Tree Council

Place Alliance

Urbed

Design Council

CPRE

Civic Voice

TDAG has also engaged with the Tree Council and the organisations it has liaised with and together we produced a list of key points – these will be submitted by the Tree Council.

## General comments

**Weighting – the balance between urban, peri-urban, rural including productive woods and forests.**

**The weighting given to the different component parts of England's tree and woodland assets, as currently reflected by the CD structure, is not sufficiently balanced to provide adequately for the different services that they can deliver.**

The urban forest receives little attention, yet about 83% of the population in England lives in urban areas.

Research shows strong associations between higher levels of urban canopy cover and significantly enhanced public health outcomes.

There is also very robust evidence of the critical importance of trees in creating climate-resilient towns and cities, in enabling an increased uptake of sustainable travel, as well as in enhancing quality of place around both existing and new homes (making higher densities more liveable, and new homes more acceptable).

**The urban forest requires thorough consideration.**

## What should an 'England Tree Strategy' include?

### 1) Sound balance

**A stronger, more holistic focus on the urban forest, and the wide-ranging benefits it can deliver for people, the economy and the environment.**

- Given that over four fifths of the English population lives in urban settlements, the ETS needs to fully recognise the role that urban forests and woodlands can play and the range of benefits they can deliver for city dwellers and England's wider economy.

### 2) Clear foundation and direction

**Concise, evidence-based statements about the baseline conditions and the key challenges/drivers for change the ETS will act upon together with clear objectives identifying how these challenges and drivers will be addressed.**

- Much is expected of trees and the services that they can deliver.
- It is vital that the tree strategy clearly articulates these services at a national level with reference to regional and local objectives and disparities, as well as highlights any barriers that may need to be overcome to achieve delivery.
- It is also vital that the tree strategy demonstrates the evidence that it is drawing on, as this will also provide the basis for monitoring.
- This will enable a more balanced approach between the key components of England's tree and woodland asset base, including the urban forest.

### **Key challenges/drivers for change to consider include:**

#### **Challenges associated with climate change:**

- Meeting carbon commitments, ie: need to increase permanent forests and woodlands for carbon sequestration (as per the Committee on Climate Change report).
- Enabling the urban forest to adapt to climate change, ie: need to increase uptake of climate suitable species, the need to address growing threats from pests and diseases.

#### **Challenges associated with the ecological crisis:**

- Reversing decline of biodiversity and habitats and the environmental services they can deliver (green recovery networks and enhanced river catchments management).
- Imbalance of ecosystems leading to overabundance of wild deer and other herbivores, as well as the presence of invasive species restricting natural regeneration of woodland.
- Low proportion of England's privately-owned woodland under UKSF management.
- Need to link the tree and woodland strategy to the ambition for nature recovery networks.

#### **Challenges associated with public health:**

- Lack of access and engagement with nature, contributing to reduced wellbeing and growing prevalence of mental health as well as non-communicable diseases, ie: need to increase access physical and visual access to trees and woodland.
- Issues highlighted above are particularly prevalent among children, ie: need to create much greater opportunities for outdoor learning and forest school style childcare and educational programmes.

- Research is emerging showing the value of prescribing 'greening' for health. Cross-department budgeting at national and local level could support the role of trees and green space in enhancing health outcomes in the population.

#### **Challenges associated with the woodland economy**

- Low uptake of sustainable timber construction compared with other European countries, low capacity to meet existing sustainable timber needs from local sources, ie: opportunities for productive forests and woodland (some of which can be urban/peri-urban) to provide sustainable timber for construction in response to the legal requirement to achieve net zero carbon and the role that trees can play when carbon is locked up in building materials.
- Decreasing production of wood fibre despite growing demand for this renewable resource and new market opportunities.
- Lack of understanding amongst tourism providers about the role of woodlands in leisure provision.
- Lack of good integration of productive woodlands in local landscapes.

#### **Challenges associated with creating quality, resilient urban environments**

- Cities and the wider quality and resilience of the built environment are critical to enabling Brexit England to compete on a world scale, successfully retaining home grown talent, offering environments nurturing wellbeing and productivity, while offering attractive settings for foreign businesses and investors.
- Urban canopy cover has been left to decline despite towns and cities in England struggling to achieve high marks in international rankings for liveability, continuing to face air pollution issues from excessive motorised traffic as well failing to meet housing demand and provide high quality new developments – all of which the better integration of trees and wider green infrastructure provisions can help address.
- Serious gaps exist in skills, knowledge and resources available to scale up the presence of trees in urban settlements in line with the Government's ambitions.

### **3) Comprehensive scope:**

#### **Actions to consider all the levers that either are or should be in place including those to monitor and review progress.**

- **Planning system and associated guidance:**  
If the government wants to achieve its manifesto and policy objectives in terms of tree planting, then the single most useful action would be to require tree and woodland strategies to be embedded in all local plans – as this provides a powerful basis for action across all of the challenges listed above.

It is important that planning is not viewed as a 'barrier' because Planning with carefully thought out policies should provide a level playing field so that what is required for any development is clearly understood and, of course, this then influences development costs and the value of the land from the outset.

#### **Recommendations:**

Require all local authorities to develop and adopt a tree and woodland strategy.

Review the Biodiversity Net Gain calculation tool to ensure it adequately reflects the importance of trees, existing/newly planted trees in the in the ground, with integration with SuDS (ie access to water).

Ensure that land identified for 'growth' or 'renewal' has been surveyed and recorded by the local authority so that true Biodiversity Net Gain is achieved (bearing in mind that previously developed land can have biodiversity value already on site and the aim of development would be to improve this).

Ensure government guidance on highway adoption identifies trees as standard adoptable items.

Encourage use of CIL (or new levy as proposed in the current planning consultation) towards local and cross-boundaries urban forest and green space projects.

Establish the requirements and scope for an Arboricultural Method Statement and Arboricultural Site Supervision reported to the Local Planning Authority.

- **Infrastructure funding** – trees must be seen as an element of infrastructure alongside engineered infrastructure especially linked to transport improvement and water management. Government-issued infrastructure funding, especially for a green recovery, should require the sound integration of trees alongside other nature-based solutions.

### **Recommendations:**

Integrate in the next iteration of the National Infrastructure Delivery Plan (the current plan will reach completion in 2021) objectives to integrate trees and other nature-based solutions into land-based infrastructure projects (transport, drainage, energy).

Integrate 'canopy cover net gain' and 'net reduction of stormwater runoff entering the sewer system' as selection criteria for funding.

Trees have an important role in creating optimum conditions for active travel – cycling and walking as they can create barriers between other users, increase cooling on routes in summer etc.

- **Funding for sustainable land management and trees** – there are already various woodland grants etc available during the transition of leaving the EU. The ELMs – public money for public good – will provide another mechanism for funding trees across the full spectrum of where trees are needed.

Given the government manifesto that all streets in new developments are tree-lined and on the assumption that all or any of them could be adopted and putting this alongside the need to retrofit tree planting in existing adopted streets to provide climate based conditions for active travel and surface water management (SuDS) there needs to be a rationale for the level and use of commuted sums based on the cost of planting in different conditions, the time required for trees to achieve independence in the landscape (as per BS 8545) and the ongoing whole life inspection costs until felling at some time in the future. This would provide certainty for management costs which would have to be agreed and factored in from the outset.

- **Skills**  
Arboriculture and forestry have an obvious role in the green recovery and the ambition to level up the economy as trees, woods and forests have an important role in all parts of England.
- **Knowledge and research**  
While there is a great deal of embedded knowledge and a great deal of existing research, it is important to identify the existing research that can further best practice and evidence based decisions about trees as well as identify gaps in

research – so what we know, what we don't know and what we need to know needs to be better understood.

- **Role of national forestry organisation** – Enhanced capacity for the Forestry Commission to work with private land owners (who control 82% of woodlands in England), local partnership (LEP, LNP) and local authorities. Enhanced capacity for research, research and development and on-going monitoring.

Will the FC extend this role to include working with private land owners in urban situations given that on average about 70% of urban trees with the potential for planting more are on private land in the hands of some large landowners such as the 'great estates' but many are owned by individuals. Engaging with both individual private land owners (at all scales) and their communities will be a critical in developing the urban forest to the necessary level.

- **Deliver, monitor and review** – trees are long lived and, indeed, they need to be long lived in order to deliver the benefits required and so it is essential that any national tree strategy builds in a performance based requirement.

- **Tree targets and monitoring**

A stronger and defined role for Local Authorities and Local Planning Authorities in preparing, publishing and monitoring Local Tree Strategies and urban forest targets in urban areas, with a requirement to engage local people in the process. If the government is serious about increasing trees and woodlands in England they could include the monitoring of local performance in the Local Authority Annual Monitoring Reports - AMRs - so that progress can be publicly measured on an annual basis.

A stronger and statutory role for Local Authorities in increasing trees, woodlands and forests, particularly in urban areas would make the National Strategy more effective and practical with a clear route to implementation.

LAs must be required to engage the public and local partners in the preparation and implementation of tree strategies.

**...and in addition...**

## **Honouring UK government commitment to deliver the UN Sustainable Development Goals in the UK as well as overseas.**

We must not overlook the fact that the UK government has made a commitment to meet the Goals by 2030 both in the UK and in its work overseas.

Several of the Goals relate to trees and these should be integral parts of the England Tree Strategy.

The most relevant SDGs are:

GOAL 2: Zero Hunger – urban farming

GOAL 3: Good Health and Well-being

GOAL 4: Quality Education – forest schools, learning about the environment so future generations will protect it

GOAL 6: Clean Water and Sanitation – SUDS

GOAL 8: Decent Work and Economic Growth – part of the "green recovery"

GOAL 10: Reduced Inequality – addressing inequalities in access to green space, especially in megacities and global south

GOAL 11: Sustainable Cities and Communities

GOAL 13: Climate Action

GOAL 15: Life on Land

GOAL 17: Partnerships to achieve the Goal -successful urban forestry is as an example this.

## **Critical actions going forward**

### **ETS enshrined in law**

The England Tree Strategy must be enshrined in law and required all local authorities to have robust, evidence based local tree strategies and be congruent with other policies and strategies. Without this, the tree strategy is of limited benefit

Local policies can then identify the tree canopy cover targets required for their area i.e. set out a vision, know what trees are existing, how and where to increase tree cover, monitor outcomes. If this doesn't happen then there is a real danger that the drive for development will create sub-standard places. For this reason robust legislation, national standards and local planning policies can also be the method by which national and local government can and must work across departments in a collaborative and interactive manner.

### **Joined up vision for the role of trees and nature based solutions**

Of course the England Tree Strategy also needs to be integrated with the proposed changes to planning (now out for consultation), the Environment Bill/ 25 Year Environment Plan, the Environmental Land Management Strategy, natural flood management schemes, nature recovery networks, identifying suitable locations for development and the need to increase canopy cover in our towns and cities. This leads to the proposal that:

## **Key Action - we need a land use framework for England**

### **Looking in more detail at urban trees:**

It is important to remember that in urban areas about 30% of trees on average are in public ownership and about 70% in private ownership. Urban areas are also those where the majority of people can engage with trees for the multiple benefits that research shows they deliver.

Trees need to be recognised as the assets that they are delivering a wide range of value as assets and ecosystem services. These ecosystem services need to be quantified and understood. They will vary in degree and quality depending on the area and tree species mix present.

Understanding the services currently delivered provides a baseline for future initiatives such as planting programmes. It also allows initiatives to be prioritised according to local needs and requirements. This is possible as a significant number of local authorities have operational inventories which can be converted, using i-tree, into assessments of ecosystem service provision and asset value. Such an initiative will also enhance and develop a greater understanding of the publicly owned urban forest. Too often they are written down as liabilities.

### **TDAG Comments on the introduction** (consultation document pages 3-5)

#### **Looking in more detail at hedges**

There are both rural and urban hedges. If we are to get the most benefit from hedges including trees in hedges then how these hedges are managed is critical. The current practice of flailing hedges is one of the major reasons why trees have problems surviving and growing in hedgerows.

#### **Looking in more detail at survival rates – the need for maintenance, monitoring and review**

If the Government is "committed to expanding and managing our woodlands to deliver the multiple environmental, social and economic benefits trees can offer," then it must look closely at the survival rates of the various planting initiatives that have and are taking place.

In urban areas it is estimated that between 30% - 70% of trees die within the first year of planting.

- Should incentives not be focused on long term survival rates (5 or 10 years

minimum so that the trees may have gained some independence in the landscape and be on the way to delivering the desired benefits...which start at about 30+ years)?

- Should planting proposals and funding be accompanied by maintenance commitments along with monitoring and review? For example in Melbourne, Australia, there are independent audits of all publicly financed planting initiative

### **Looking in more detail at reasons for planting trees in the first place**

All planting initiatives should be strategized, assessed, and prioritised to ensure that maximum public good is achieved.

Priorities will vary from community to community with the needs being different from area to area.

This impacts on decisions such as species choice.

### **Looking in more detail at resilience, tree population diversity and biosecurity**

Resilience to climate change and imported pest and disease is also a critical element.

In all planting locations – urban, rural and peri-urban, diversity within tree populations a critical element.

Mass numeric planting tends to ignore this characteristic with numbers being the most important feature.

### **Handling the Native v. Non-native trees debate**

There is a great deal of discussion around this topic and there are some myths that need to be dispelled particularly in relation to a) climate change and provenance and b) urban environments.

TDAG focuses on urban trees and so the point to make here is that urban environments do not reflect the 'local climate' but rather put trees into what has been described as 'arid deserts' – so trees need to be able to withstand very harsh conditions in urban environments and this needs to be better understood by all those who specify and select tree species for urban plantings.

### **Looking in more detail at tree planting for climate change**

From the Committee on Climate Change *"Our net-zero scenarios imply the area of woodland cover in the UK increasing from the current 13% to around 17-19% by 2050. This is based on annual tree planting levels reaching at least 30,000 hectares from 2024, possibly up to 50,000 hectares."*

Is this ambition for tree cover high enough? The European average is about 38% tree cover.

We also need to think long term in terms of tree planting for carbon sequestration as, according the Grantham Institute

Again this highlights the need for an England Land Use Framework or Strategy.

### **Looking in more detail at tree nurseries and supply**

*"This bold ambition underpins our strategy for England over this parliament – to increase domestic nursery capacity in the short term, streamline our grants and engage landowners to take them up, and combine public and private investment to drive woodland creation at scale."*

The question of nursery capacity is one that keeps being stressed as an objective.

While this is a worthy objective it always ignores the practicalities when addressed to larger urban trees.

The timescale in producing urban trees, 12-14 and above is a minimum of five years and longer the larger the tree required.

Investment levels are higher, and the amount of ground required greater. (To increase the capacity according to one nursery to hold another 10,000 trees would cost approximately £250,000 if the land were available more if not.)

The point is made later in the document that such investment would be a foolish investment against a background of fluctuating demand often driven by the erratic allocation of public money.

This is compounded by the threat associated with biosecurity.

An outbreak of *Xylella* close to a production nursery could result in that nursery being virtually closed -down even if the nursery itself was clean. Again, this situation is hardly conducive to nursery investment.

Even if nursery production could be increased there are certain factors which are unknown. There appear to be no known figures which quantify the number of large trees, 12-14 and above, that are shipped 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.

Why is the question of VAT not addressed?

Removing VAT from trees would cost very little but incentivise the market.

It is vital that the demands of forestry where one/two year old seedlings are used and urban trees where mostly larger trees are used need to be clarified and treated as two very different situations in terms of production.

Perhaps it would be helpful to specifically consult tree nurseries about policy given their key role in production and delivery?

### **Looking in more detail at land management**

*"We are developing this strategy as part of a fresh domestic approach to land management across our landscapes. So this consultation has been developed in parallel with other environmental strategies flowing from the 25 Year Environment Plan, including our recent Tree Health Resilience Strategy, and the forthcoming Nature Strategy and England Peat Strategy. Integrating these should enable sustainable change at landscape-scale and collective delivery of the 25 Year Environment Plan goal of improving the environment within a generation."*

To which must be added the proposed changes to planning. The implications of all these strategies and the proposed new planning policy with its definitions for land use need to be understood geographically within a land use framework for England so that there is landscape scale spatial planning to ensure effective decision making and delivery.

**Looking in more detail at funding for urban trees**

There is an ELMS test and trial for the urban forest underway.

Should there be a ‘Nature for Climate Fund’ for cities?

The consultation is split into four pillars outlined below - the roles of delivery partners and the power of good partnerships in meeting our ambitions is crucial to all four.

**Looking in more detail at the role of urban trees**

<p><b>Expanding and Connecting</b> trees and woodland</p>	<p><b>Protecting and Improving</b> our trees and woodland</p>	<p><b>Engaging</b> people with trees and woodland</p>	<p><b>Supporting</b> the economy</p>
<ul style="list-style-type: none"> <li>Establishing more trees and woodlands and ensuring they are resilient to our future climate, pests and diseases</li> <li>Addressing barriers to woodland creation</li> <li>Creating space for nature</li> </ul>	<ul style="list-style-type: none"> <li>Protecting our trees and woodlands</li> <li>Managing woods to recover biodiversity and increase resilience</li> <li>Developing our domestic nursery capacity</li> </ul>	<ul style="list-style-type: none"> <li><b>Increasing access to trees in and around towns and cities</b></li> <li>Education and engagement with woodlands</li> <li>Enabling investment in and protection of green infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>Diversifying rural economies</li> <li>Enabling agro and energy forestry</li> <li>Supporting our timber industry</li> <li>Increasing forestry skills</li> </ul>

Why have ‘urban trees’ been confined to engaging?  
Surely, they should be included in all the columns?

**Expanding and connecting out trees and woodland**

**Looking in more detail at ambition and canopy cover** (consultation document page 6)

*“The government’s manifesto commitment is to increase tree planting across the UK to 30,000 hectares of tree planting per year by 2025. This reflects Committee on Climate Change (CCC) advice that the UK should increase planting rates to between 30,000 and 50,000 hectares per year and maintain these to 2050 to reach net zero emissions.”*

What percentage of the 30,000 hectares per year or percentage of the target is to be achieved in England?

What is the required canopy cover for English towns and cities to achieve of both the healthy placemaking and respond to the climate/biodiversity crisis and therefore what increase in tree cover is required?

Of course, canopy cover is just one metric and often used without a clear understanding of what it means or how long it takes to achieve canopy cover gains though tree planting.

More relevant for urban areas are establishing:

- Number of trees per head of population
- Number of trees per household
- Number of trees per square mile, square kilometre.
- Number and size of trees in the population.
- Age and size diversity.
- Species mix and species diversity.
- Annual loss and attrition rate associated with routine urban forest management.

***"Reaching this rate by 2025 puts us in a good position to adapt flexibly to future requirements to balance the decarbonisation pathways of all sectors to deliver our net zero target."***

What does this mean in practice?

## **Creating space for nature**

**Looking at the Nature Recovery Fund in more detail** (consultation document page 7)

What percentage of this will be dedicated to urban areas?

**Working together to create landscape level change** (consultation document page 10)

**Looking in more detail at landscape level change – cultural landscapes?**

What about cultural landscape issues i.e. returning the appropriate deforested land to tree planting may upset some present users with a 'misunderstanding' of historic landscapes such as hill farming, grouse moors etc, often proof of the devastation caused by man's activities?

There are also veteran trees and trees on the way to being veteran trees in the urban landscape which must not be ignored.

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

**Looking in more detail at the public forest estate** (consultation document page 11)

*"The Public Forest Estate, of over 253,000 hectares in England, is managed by Forestry England for the benefit of the nation."*

Surely all trees owned and managed by local authorities are part of the public forest estate. There is no mention of this here. Again the emphasis is on forestry and woodland in public ownership. There is no attempt to quantify or value the publicly owned estate in the urban realm. This is possible, but there is nothing in this document that indicates that quantifying and valuing the urban forest on a national scale would be of value or useful as a benchmark starting point for managing the urban forest.

*"We estimate there could be at least 13,000 hectares of vacant and derelict land and 84,068 hectares of historic land fill sites in England. Such restoration projects tend to be complex, require sustained investment, but can deliver significant benefits if done in the right way."*

How does this relate to the present planning consultation where vacant and derelict/brownfield land is ear-marked for development? It is possible to have trees, green space and development – with robust local plans and investment in design.

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

### **Looking in more detail at supply and biosecurity** (consultation document page 12)

This has been mentioned in our comments above on tree nurseries.

*"The UK's nurseries currently produce over 100 million trees each year for forestry."*

Again, 100 million trees for forestry. How many for the urban, what sizes, what species, how many are imported. All unknown yet there is a presumption that *"a significant capacity increase is required"*. The focus is entirely on woodland creation and seedling production.

*"Planting stock needs to be bio secure and from a known provenance. That is why we want more planting material to be sown and grown in the UK and support the Plant Healthy Assurance Scheme launched in February 2020."*

But, is the Plant Healthy Assurance scheme actually up and running effectively?

To date just one nursery in the UK has been audited and received accreditation.

How can this worthwhile initiative be completed and operational across all market areas as soon as possible?

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

### **Looking in more detail at protecting and improving our trees and woodlands** (consultation document page 17)

*"Our ancient woodlands are home to biodiversity which has built up over centuries, at least 400 years, making them very special and irreplaceable habitat. Similarly our ancient and veteran trees are heritage features with great ecological value which is also irreplaceable."*

If ancient woodlands etc are irreplaceable how will the England Tree Strategy impact on HS2 or will these big infrastructure projects be omitted? They shouldn't be!

Are there issues about native trees even in woodlands?

Should there be definition of provenance? Fitness for purpose and response/resilience to climate change and increased temperatures, reduction in water etc?

See below preparing for future climate...so why have this policy when it conflicts with advice below?????

*"One particular risk to all trees and woodland is the un-licensed pre-emptive clearance of trees ahead of planning applications to develop land."*

Accurate mapping of what we have and where across the country and the digitisation of planning as proposed in the Future of Planning consultation – *"The planning system must build on this success and follow other sectors in harnessing the benefits which digitisation can bring - real-time information, high-quality virtual simulation, straightforward end-to-end processes. It should be based on data, not documents, inclusive for all members of society, and stimulate the innovation of the great British design industry."* – would help to ensure that pre-emptive clearances are not made and, in development situations, would also ensure that biodiversity net gain was a true net gain.

## Preparing for our future climate

**Looking in more detail at preparing for our future climate** (consultation document page 18)

*"Our climate is changing at a faster rate than many of our native trees may be able to adapt to. In the future, an average global temperature rise of **four degrees Celsius** may result in UK woodlands facing summer days at least five degrees warmer than present day; increasing risks of drought in summer and conversely, flooding in the winter months."*

Four degrees? Is this the figure that is intended here? The IPCC 1.5°C report painted a very concerning scenario if we exceeded this and 2 degrees could be a tipping point. When did planning start for 4 degree Celsius increases in average global temperatures?

In terms of responding to temperature rises climate maps need to be added to the proposed Land Use Framework so that the impacts on the types of forests and woodlands that will be able to survive as temperatures in the UK rise can be assessed.

TDAG has commented on native trees above.

## REGULATION

**Looking in more detail at tree preservation orders** (consultation document page 21)

*"Feedback from stakeholders has shown us that TPOs are valued as a way to protect trees, but work is needed to bring the system up-to-date and ensure they are applied and enforced with consistency. Greater clarification of the criteria for making a TPO, including consideration of ecosystem service values, would be helpful."*

TDAG agrees with these comments and would add that legally enshrined national tree strategy and local tree strategies and management plans.

Further questions need to be answered if TPOs are to provide the protection intended:

- How many trees are actually, protected across the UK?
- What is the ecosystem service value of those trees?
- What resource is employed by local authorities to manage the system and what is it delivering in return for that resource.
- Could the resource be better used in general population management?
- Why are TPOs and risk management the only statutory requirements associated with trees and why is there no assessment of the public good achieved by the use of TPO's?

Quote from *New Lives, New Landscapes*, Nan Fairbrother (1970), "Nor are measures like Tree Preservation orders the simple solutions that many people hope, although they may work in special cases (in urban areas a preserved trees is the newest status symbol of modern gardens

## Engaging people with trees and woodlands

**Looking in more details at engaging people with trees and woodland** (consultation document page 26)

*“Trees should benefit everyone, in our daily lives ...our manifesto sets an ambition to see all new streets lined with trees, and we wish to see more trees planted in urban and suburban areas overall.”*

TDAG has already commented that urban trees need to be equally weighted in many other parts of the proposed tree strategy. Meanwhile, this is the only part of the proposed strategy that deals specifically with urban trees.

TDAG supports the need to increase urban canopy cover and to ensure that it is more equitable. As expressed above, canopy cover is not the only target to take into account (page 11 above).

Amendments to planning legislation include trees is welcome. Meanwhile we would also TDAG's forthcoming guidance *Trees, Planning and Development: A Guide for Delivery*

**Street trees** (consultation document page 27)

However, if the Government really wants to ensure that *“all new streets are lined with trees, and we wish to see more trees planted in urban and suburban areas overall...”* then a number of actions will need to take place to make this possible.

1. Highway authorities must support the inclusion of trees in streets and there needs to be a clear understanding about planting, ensuring that trees are independent in the landscape and that costs of planting, achieving independence and ongoing maintenance are realistically costed on a whole life basis equating costs with the increase in asset value (see LB Islington).
2. That trees are planted in the right way for given locations (see *Trees in Hard Landscapes: A guide for delivery*)
3. That in new developments utility provides including fibre optics and cable have to be in shared utility ducts to avoid competition underground with tree roots.
4. That in areas of shrinkable soils and low rise buildings (often housing) foundations are designed and installed to enable tree planting without fear of later subsidence issues. This will require changes to, for example, NHBC guidance Chapter 4.2 and Building Regulations approved document A.

Finally, TDAG would draw attention to the 'Barriers Report' which is still current in its identification of all the issues that can help or hinder tree planting and long term survival especially in streets.

([http://www.tdag.org.uk/uploads/4/2/8/0/4280686/btp\\_barriers\\_and\\_drivers\\_final\\_report\\_march\\_2013.pdf](http://www.tdag.org.uk/uploads/4/2/8/0/4280686/btp_barriers_and_drivers_final_report_march_2013.pdf))

## Developing green and healthy places to live

**Looking in more detail at developing green and healthy places to live** (consultation document page 28)

Again this reinforces the case for mandatory tree and woodland strategies for all, not just some, local authorities.

For planning and development this provides a level playing field alongside biodiversity net gain requirements – this can get rid of the costly process of planning conditions and enable developers to establish the costs of developments from the outset and this in turn feeds back into land values, again avoiding the costly negotiations over viability.

*"Government could also go further to ensure urban trees are better recognised as green infrastructure, promoting their value and benefits as part of wider green infrastructure planning, as demonstrated in the National Design Guide. Such an approach supported by valuation methods can help developers and local authorities consider urban trees as assets rather than burdens. This can ensure trees are funded and designed into developments and our urban landscapes, supported where necessary by using appropriate engineering solutions. These could include repairs in highways that accommodate trees, and using techniques like pile and beam rather than trench fill foundations in areas with soils that can shrink. These measures will help deliver our manifesto commitment for every new street to be lined with trees."*

The comments in the above paragraph are welcome.

We would just point out that trees are the largest and longest lived of all elements of green infrastructure and require longer term planning than many elements of green infrastructure which may come and go (green walls, green roofs, some of the smaller green spaces and pocket parks for example) – this is why we need tree strategies as standalone strategies and not as part of a green infrastructure strategy.

### **Comment on questions for engaging people with trees and woodlands.**

As we explained at the outset, the multiple choice questions are not appropriate for the task in hand. We have therefore limited ourselves to comments on some of the questions.

### **Engaging people with nature** (consultation document page 29)

This is important and doesn't only relate to engaging with community forests but the need to have trees and greenspace available to people in urban areas within a 15 minute walk of their homes. As mentioned above, cross departmental budgeting at national and local level would support the role of trees and urban greening in creating mental and physical health benefits – supporting the green prescriptions that some doctors are now recognising as valuable 'cures'.

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

### **31. Are any of the following significant barriers to securing and maintaining street trees?**

#### **TDAG comment:**

1. National standards and guidance are critical. For example TDAG is working with the Subsidence Forum, NHBC and others on achieving resilient foundations for low rise buildings on shrinkable soils. This is essential for future climate stress, climate risks, insurance, mortgages etc. So industry wide buy in to national standards and guidance is key.
2. Skills are clearly a critical issue and the skills needed for d) and e) could be part of a green recovery /job creation programme
3. As mentioned above – refer to the Barriers Report

### **32. How could government overcome the barriers to securing and maintaining street trees you have identified in question 31?**

1. Legally enshrined planning strategies for all local authorities.
2. Tree canopy targets for all local authorities

3. The ambition to retrofit trees and SuDS in existing locations.

**33. Which of these actions would be most effective in increasing the number/coverage of trees in and around urban areas?**

**TDAG comment:**

Manual for Streets (and its anticipated update) should be legally enshrined, not just 'guidance'.

**34. Which actions would most help the preparation and implementation of local Tree and Woodland Strategies?**

**TDAG comment:**

Please refer to forthcoming TDAG document on *Trees, Planning and Development: A Guide to Delivery*. Section 1 is due in the autumn and includes a briefing note on how to write a tree strategy.

Tree strategies need to be written collaboratively by cross-disciplinary and departmental teams – it is not appropriate to leave this task to the 'tree officer'.

**35. Which actions would most effectively engage people in the management and creation of their local woodlands?**

**TDAG comment for Questions 35 & 36**

1. People's engagement in urban areas can and should focus on individual trees in streets, in parks, on estates...rather than just woodlands.
2. All the actions are required in both questions and so not reasonable to rank them.
3. Woodlands in urban/peri-urban settings are more acceptable to people if there is woodland management and the presence of activities – just as parks need park keepers and gardeners.
4. TDAG support community forests and access to green space generally for areas of greatest deprivation – the need being demonstrated as critical as a result of the Covid-19 lock down.
5. As with Question 36 it is not possible or appropriate to rank the options as all have a value in terms of achieving the objectives.

**36. Which actions by government would be most effective in addressing barriers to peoples' access to trees and woodlands?**

**37. Which of the following do you most value about trees and woodland?**

**TDAG comment:**

Trees provide value over a range of issues and all are equally important.

**38. Which of these actions would best address the funding challenge for the planting and on-going maintenance of trees in urban areas?**

**TDAG comment:**

1. Another question where all the options have a place and merit. All are needed for the long term success of planting and maintaining urban trees.
2. Trees are long lived and all costs should be taken on a whole life basis. There will be costs at the beginning and end of life but once the trees are established in the landscape the ongoing maintenance costs should be minimal apart from the required annual inspections.
3. Cross department funding for trees is required. We talk about the health benefits that trees and greenspace provide...but does the local health budget contribute to the tree budget for example? We talk about trees improving the quality of place, but does the housing budget contribute to the tree budget...etc????

## Supporting the Economy

### Looking in more detail at supporting the economy

**Timber** (Consultation document page 34)

*"Timber is a sustainable and eco-friendly building material. By using it in construction we lock the carbon captured by the tree into the building, and avoid the high carbon costs of bricks and steel. Currently however, only 23% of homes in England are built with timber frames, compared to 83% in Scotland. At the same time the UK currently imports 81% of its timber and wood products, so our demand far exceeds domestic supply. Building on commitments in the 25 Year Environment Plan and the Clean Growth Strategy we want to take measures to increase the use of all domestic forest products including timber in construction in line with fire safety regulations."*

*We want to see the expansion and use of the Grown in Britain Certification mark throughout the supply chain. This will reduce the carbon footprint of the construction industry and further encourage the market to invest in our domestic timber industry and home grown forest products."*

There is a role for timber in UK construction but it comes with some caveats:

1. The carbon locked into the tree at the time of building only remains locked and so sequestration cannot be included in any calculations as that has already taken place (this approach can vary depending on the carbon calculator used – see RICS et al) and the final assessment depends on how the timber is treated at the end of life – *"if timber is landfilled at the end of its useful life, analysis has suggested that the net emissions from a CLT framed building could exceed the life cycle emissions from a typical concrete framed building. When timber is landfilled it rots and releases up to 60% of the sequestered carbon back to the atmosphere as methane, which is 25 times worse than carbon dioxide in terms of global warming impact."* KLH Sustainability
2. We need trees in forests for carbon sequestration on a global scale and so our 83% of imported timber cannot be at the expense of the carbon sequestration targets of other countries from which the timber is sourced even if FSC/PEFC certified.

There is a role for managed, productive woodland (both rural, urban and peri-urban) creating employment and valuable timber products through coppicing etc. An example of this is seen at Flimwell, Sussex <http://www.woodnet.org.uk/wec/> Coppiced timber has many uses (excluding firewood of course!)

#### References

- Institution of Structural Engineers  
<https://www.istructe.org/IStructE/media/Public/Resources/istructe-how-to-calculate-embodied-carbon.pdf>
- Royal Institution of Chartered Surveyors (RICS)  
<https://www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the-built-environment-november-2017.pdf>

**Energy** (consultation document page 34)

*"Energy forestry uses fast-growing trees which are planted and specially grown on a short rotation to provide biomass for power generation. This has an important role as we green the UK's electricity and heat systems, moving away from fossil fuels. This is desirable because unlike burning fossil fuels which simply release carbon into the atmosphere, biomass is a renewable resource which take carbon back out of the atmosphere through photosynthesis as the plants regrow."*

**But....**

1. We need to get the UK to completely net zero which couples biomass energy combustion with CCS (Carbon Capture and Storage) to provide some carbon negative ability to offset some of the residual very hard to eliminate carbon emissions (<https://www.nationalgrideso.com/future-energy/future-energy-scenarios/fes-2020-documents>)
2. There is also a very significant contribution for urban area energy savings. If used sufficiently to modify the microclimate it reduces the use of building energy use – for it example it reverses the current trend for more and more mechanical cooling, and reduces the energy needed for AC heat rejection process.

