

ADEPT response to England's Tree Strategy Consultation

1. Introduction

ADEPT is a professional association that represents executive 'directors of place' from county, unitary and combined authorities, along with directors of local enterprise partnerships, sub-national transport bodies and corporate partners drawn from key service sectors. More than two thirds of households in England rely on services provided by ADEPT members including housing, environmental and regulatory services, planning, development, culture, and highways and transport. ADEPT represents its members' interests by proactively engaging Government on emerging policies & issues, promoting initiatives aimed at influencing government policy, and through the sharing of best practice, professional networking and development opportunities. Our priorities include planning for a 'clean and green' recovery and renewal from the pandemic along with the spending review, white papers on devolution and planning, the Environment Bill, publication of the National Infrastructure Strategy and continued negotiations relating to Brexit.

ADEPT is supportive of the aspirations set out in the draft England Tree Strategy. That support is dependent on local authorities being resourced with the appropriate tools and resources to deliver on these ambitions. The policy aspirations in this document must be seamlessly linked with other emerging environmental policies and funding streams i.e. biodiversity net gain, local priorities set out in Local Nature Recovery Strategies, the new Environmental Land Management Scheme (ELMS) and the recent Flood and Coastal Risk Management National Strategy. Most importantly, the outcomes must be linked to any revised planning framework that evolves from the current consultation on changes to the planning system. Finally, clarity is sought on how the outcomes of the tree strategy are going to be measured to ensure delivery of better ecosystem services.

2. Protecting and Improving

ADEPT notes that a step change is needed in how we protect and enhance our woods, so that they can play a vital part in a UK-wide restoration of rivers, nature and wildlife. Not only do our finest and most important trees and woods need to be properly protected by the planning system, greater value should be placed on already established trees and woodland. Ancient woodlands which have been damaged by commercial plantations must be restored along with orchards, which have declined dramatically in recent decades.

The rise of tree pests, pathogens and diseases, in particular ash dieback, is becoming a very real and increasingly costly issue for local authorities both from a public safety perspective and also from a management / replacement angle. A recent study¹ estimates that the total economic cost of ash dieback in Britain to be £14.8 billion, one third greater than the estimated cost of the 2001 UK foot-and-mouth disease outbreak (adjusted for inflation). This cost is estimated over 100 years, but more than half of the total cost (£7.6 billion) is expected to occur within the next 10 years (due to the rapidity of the disease).

¹ <https://www.sciencedirect.com/science/article/pii/S0960982219303318>

In addition, it is the scale of impact from ash dieback that cannot be ignored – it is estimated that the disease will kill between 80-95 per cent of ash trees. There is a serious risk that ash dieback will work against the tree strategy – the loss of trees due to the disease may exceed the number of trees the strategy will plant – so local authorities need to be enabled to deliver.

It is essential that the tree strategy strongly encourages new tree stock to be sourced and grown in the UK, and for robust new processes and resourcing to be put in place for quarantine, testing and rapid response to disease outbreaks. Tree procurement and biosecurity standards should be in place for all tree planting schemes. We would also encourage the investment and expansion of UK nurseries to reduce the threat of importing trees with devastating diseases.

The tree strategy offers the opportunity for a step-change in terms of tree protection. An effective strategy must look to highlight opportunities to safeguard natural regeneration, scrub and hedgerows. This could include a review of Tree Preservation Orders (TPOs) and hedgerow management / retention criteria and obligations. The TPO system should also be able to take full account of the wider benefits of trees, including ecosystem and green infrastructure services, and should consider introducing additional categories (e.g. veteran & parkland trees) where current exceptions severely reduce the effectiveness of TPO protection (e.g. deadwood).

Any changes to the planning system flowing from the White Paper should not reduce existing protections for trees in any setting. Rather, the reforms should ensure existing trees and ancient stock are given greater value and offered better protection throughout the various stages of the planning system.

3. Expanding and Connecting

The Government's target for 30,000ha of new woodland in England by 2025 must be a minimum net increase. Public money for trees must combine quantity with quality, to support native woodlands which offer multiple benefits including important wildlife habitats and connectivity, long-term carbon sequestration and storage, landscape and beauty, access and public health benefits, and slowing the flow of water off the land. Working at the landscape scale, the objective is to create mosaics of nature-rich habitats through a mixture of new planting and allowing existing woodland to expand naturally.

'Right tree, right place' is critical to successful, functioning woodland expansion. With habitat creation, trees are not always the right option. Any tree planting proposition must take into account the existing type of habitat and its environmental value. For example, it could be highly deleterious to plant trees on peatlands or grasslands important for associated plant or wildlife communities. Other issues to consider include soil type, aspect, water availability as well as local planning and community priorities. Numbers of trees and additional tree cover do not equate to a functioning woodland ecosystem. As such, the tree strategy needs to take a whole systems ecosystem approach, not just one that is heavily geared toward carbon sequestration.

Unfortunately, little importance has been placed in the document on the ecological and cultural qualities of non-woodland planting such as hedgerows, orchards, wood pasture, scrubs or parkland (including their role as green infrastructure). The strategy must give them sufficient consideration, funding and protection. The strategy also places little importance

on safeguarding, enhancing or restoring soils. An effective strategy should place greater emphasis on the health of soil / microbiomes, as it is intrinsically linked to tree establishment and habitat creation, and hugely important to carbon sequestration.

A more holistic approach must be promoted when considering new planting schemes especially in relation to addressing flood management issues. For example, not only planting trees along watercourses as referred to in the document, but along the line of surface water flooding² to slow down runoff and reduce sediment erosion.

Attention must be also given to the implications of largescale tree planting on the character of protected landscapes i.e. AONBs, sensitive habitats, as well as the protection and enhancement of the historic environment. Not all heritage sites are recorded and many are still being discovered under woodland cover. As per the UK Forestry Standard (2004)³, important heritage features and archaeological sites must be protected, and damage avoided.

Targets associated with expanding and connecting woodlands must focus on quality as well as quantity and seek to measure the delivery of multiple benefits i.e. carbon sequestration, nature recovery / enhancement, reduced flood risk and benefits to people.

It is also crucial that new woodland creation and expansion ties in with the opportunity areas and local priorities that will be identified by local authorities as part of their requirement to produce Local Nature Recovery Strategies (LNRS) under the Environment Bill. To be effective, LNRS must be integrated into Local Plans in order to ensure the protection of priority areas for nature and to identify key opportunities for new habitat linkages as a result of development.

Where there are areas fortunate to be well-wooded, greater emphasis on enhanced and effective management of existing woodland/trees may be more appropriate than increased tree planting/creation of new woodland.

4. Engaging

Street trees and nearby woods help to make our towns and cities more pleasant, healthier and more resilient places to live, work and study. They help prevent flooding, reduce urban heat, filter pollution from the air and make great places for experiencing and enjoying nature. Local authorities need sufficient resources to protect, manage, restore and expand woodland and tree cover in line with their local priorities and plans. As well as looking after existing trees, more woodlands should be included in new developments along with plans for accessible new woods near to where people live.

We would support the strategy setting out best practice for local authorities via 'Local Tree and Woodland Plans', with the aim of increasing tree canopy cover to at least 30% in new developments and providing more protection to existing trees especially where they are performing an important service like flood protection.

² Surface water flooding is one of the responsibilities of Lead Local Flood Authorities. LLFAs hold maps that show the extent of surface water flooding flows i.e. flooding that occurs before the water reaches watercourses such as when there is intense rainfall, and surface water drainage systems are unable to cope. This is an increasing problem and impacting on the highway asset. Mitigating measures such as tree planting, which help to slow the flow on these known surface water routes, are beneficial.

³ <https://www.gov.uk/government/publications/the-uk-forestry-standard>

Significant emphasis is rightly made on the importance of street trees in terms of the multiple benefits they can deliver from urban cooling, air pollution reduction and flood alleviation. However new street trees can be complex to deliver, requiring significant planning and involvement/buy in from other professions within a local authority to ensure success. Additional planting within highway land will add a significant burden to already shrinking local authority highways maintenance budgets, particularly if poorly planned or executed.

We would suggest that there are new design standards, to ensure trees are integrated into the earliest possible stages of concept; that space requirements above and below ground are fully addressed, e.g. wider verges and footways; services are located well away from street trees; realistic commuted sums for adoption which must be used for tree maintenance; holistic tree strategies; supplementary planning documents; long-term funding to secure successional planting to achieve age, structure, species diversity. This policy aspiration needs underpinning with sufficient funding with respect to both the planting and the ongoing maintenance commitment.

In addition to creation of new tree-lined streets, there is a pressing need to retrofit urban sites with good quality green infrastructure. Agreeing suitable species of tree and ensuring that sufficient soil volume is provided and ensuring that the planting does not present a long-term conflict with other infrastructure, is a considerable undertaking. It is vital that these issues be addressed in a national strategy.

The strategy provides little detail on meeting the specific needs of vulnerable residents or how to maximise the benefits of trees for these individuals. For example, how existing woodlands can be made more accessible to visitors without detrimentally impacting the setting. One solution is to cross reference this strategy to the emerging Green Infrastructure standards being developed by Natural England.

Finally, we would suggest introducing a national scheme that enhances public recognition of woodlands managed sustainably, for example, like the Green Flag awards.

5. Supporting the Economy

The UK's woods and forests absorb carbon, support leisure, reduce flooding, and provide orchard fruit and timber worth a significant amount in value. Expanding our woods can enhance landscapes and support tourism, while investing in supply chains and specialist skills will create jobs and mean more of our trees are well looked after.

The strategy must make a commitment to develop UK grown tree stock that supports local economies and ensures a bio secure supply. This would include incentivising the use of UK grown trees & timber. We would strongly encourage investment in plant nursery capacity, seed production and collection so all new trees planted using public money are UK-grown. We would also welcome the strengthening of supply chains to encourage more use of home-grown timber as a sustainable building material for new build, renovation and repair.

The strategy needs to support local economies by investing in skills training needed to provide advice and care for both existing and new trees and woodlands, and in promoting attractive landscapes that help support tourism.

We feel there is too much emphasis in the draft document on timber production - which only represents 8% of the value of tree and woodland ecosystem service value – rather than broader ecosystem services including carbon, air and water quality, biodiversity, natural flood management, landscape, cultural heritage value, public health and well-being. Woodland management and any related incentives should take into account the range of services provided by woodlands and associated habitats, particularly biodiversity.

Finally, our recommendation is that the Government should require Local Enterprise Partnerships to include trees and woodlands in Local Industrial Strategies, recognising the long-term economic benefits of investing in trees.

6. Funding

Greater value should be placed on already established trees and woodland; they should not be so readily and easily lost from the landscape as a result of development, infrastructure, land use and other interventions. This includes better resourcing of local authorities to support planning enforcement functions.

The strategy needs to explore and facilitate both public and private investment based on numerous services provided by trees and woodland. Currently the main focus is on carbon offsetting, missing opportunities to invest based on reducing flooding, improving water and quality, increasing biodiversity, enhancing public health benefits which could be relevant to different funding sources including private investors. Water companies are leading the way on this approach, and it needs to be made relevant to more sectors and not just large companies. Private investment would need to be based on a predicted annual cost for providing these services, not just the upfront capital cost of planting the trees. There is a need to link local investors with local projects and landowners, to make the investment relevant to their interests in the area e.g. reduced flooding.

Critical to this process will be Local Nature Recovery Strategies, which will highlight where funding from these multiple sources (private, net gain, ELMS) should be directed. Bearing in mind the importance of these documents, which will be mandated under the Environment Bill, local authorities need adequate resourcing to produce them. Greater clarity is needed on how the £640m Nature for Climate Fund, announced in the March 2020 budget, will operate and be used for.

Natural establishment can take a long time compared to tree planting. Appropriate 'rewilding' / natural woodland regeneration options must be included in the forthcoming ELMS, with appropriate long-term scheme lengths. In addition, there is need to incentivise sustainably managing semi-natural woodlands beyond current stewardship schemes. The Woodland Carbon Code incentivises tree planting, but the scope needs to be widened to include managing existing woodlands to ensure their potential to absorb carbon whilst encouraging a flourishing woodland ecosystem. Unsustainably managed woodlands and ageing woodlands without understorey regeneration will not fulfil their carbon storage potential and are potentially net emitters of carbon as woodland ecological processes break down.

The need for long-term management and maintenance funding is critical. Extreme weather events e.g. high winds and storms can damage and bring down trees, creating public safety issues and associated costs. Tree planting itself does not equate to a functioning woodland; maintenance and management over the long-term is essential to achieve that goal. It takes

time to achieve biodiversity and carbon “targets” related to woodland, or woodland cover that equates to a functioning woodland.

A key issue for local authorities is the long term financial and legal ramifications of street trees. This is both in terms of managing existing tree stock – particularly with the impact of new diseases such as ash dieback (see costs referenced earlier in this response) - as well as aspirations for new street tree planting. Additional planting within highway land will add a significant burden to local authority budgets. This policy aspiration needs to be funded with respect to both the planting (capital) and the ongoing maintenance (revenue) commitment.

This is an important distinction given the legal governance of local government budgets. Planting trees creates a new asset, so is considered a capital outlay. The reactive removal of a tree e.g. if that tree is removed following an incident such as total collapse or loss of major branch, is considered as revenue expenditure. However, if the removal of a number of trees is to be undertaken as planned ‘preventative maintenance’, we would suggest that this investment is considered as ‘capital’ as the result is a safer highway environment (i.e. an improved asset).

We propose that local authorities should be able to approach tree removal and replacement in a ‘totex’ type way i.e. allowing flexibility between revenue and capital expenditure. Local authorities also need clarity that they can use capital to reduce a liability (ash) and enhance their asset (replanting). We would be happy to engage further with Defra on this issue and would recommend that the Department for Transport and MHCLG are also involved.