

## TREES AND DESIGN ACTION GROUP

### DEFRA CONSULTATION ON PROTECTING AND ENHANCING ENGLAND'S TREES AND WOODLANDS.



#### Tree Benefits:

The evidence supporting the benefits of trees is now overwhelming and is continuously being added to. It is impossible to deny that trees are a public good, particularly in the built environment, and make a positive contribution to all areas of social, environmental and economic policy both national and local.

Trees make lives better and the national management of tree populations both now and into the future is critical if those benefits are to be sustained and enhanced into the future.

With the above in mind, The Trees and design Action Group (TDAG) welcomes the DEFRA consultation and the recognition, at government level, that trees are not an optional addendum but critical in the creation of place, particularly in the built environment, that is fit for people to live, work and play.

Emerging evidence indicates the Britain's urban tree canopy cover is declining. TDAG's position is to be instrumental in arresting that decline and stimulating the creation of a policy framework where the position is reversed and ultimately an optimum tree canopy cover across the nation is achieved.

Set out below is a detailed series of responses to the questions asked in the consultation document. The order of response is altered to emphasise the fact the TDAG believes that Tree Strategies and supporting detailed management plans, at both national and local level, are the top priority and essential if optimum canopy cover is to be achieved. All other considerations are secondary and should be addressed through the medium of national and local tree strategies.

#### 1.0 TREE AND WOODLAND STRATEGIES:

**Question 12.** *Do you agree that Tree and Woodland Strategies help local authorities and the public to manage their trees and woodlands? Would best practice guidance be sufficient for local authorities and the public?*

**Question 13.** *Do you agree with the suggested content for best practice guidance for Tree and Woodland Strategies?*

- 1.1. Best practice guidance would be welcome, but a parochial perspective should be avoided. There are many international models of high quality strategic urban forest management which should be referred to and learnt from. Examples include Melbourne in Australia and Greater Lyon in France.
- 1.2. Guidance implies that the production of Tree and Woodland Strategies should remain discretionary. This simply will not work. The production of such strategies MUST be a statutory obligation. While the strategic management of trees remains a discretionary function, it will always be relegated to a position below other statutory requirements with resources allocated accordingly. Trees need to be recognised formally by government as the asset they are.

- 1.3. There needs to be a national model of the local tree strategy, as guidance, which is used as a constant by all local authorities within a statutory framework. This model needs to go beyond mere guidance and become obligatory. A consistency achieved nationally will allow comparisons to be made between different areas of the UK and the creation of a national tree strategy document.
- 1.4. The production of Tree and Woodland Strategies within a statutory framework will undoubtedly help local authorities and the public manage their trees and woodlands. Without the statutory requirement guidance will remain just that guidance with a significant percentage of authorities choosing not to prepare strategies. *Note: Trees in Towns II published by the Department of Communities and Local Government in 2008 and the last major national assessment of urban trees recommended the development of tree strategies and provided best practice guidance coupled with case studies. Ten years later and a very high percentage of authorities still do not have a strategy document despite the guidance published. This exercise unless statutorily enforced will have a similar outcome.*
- 1.5. The requirement to produce tree and woodland strategies must be adequately resourced at both national and local level.
- 1.6. The production of tree and woodland strategies should NOT be the sole responsibility of local authority tree officers. While these specialists are invaluable as custodians of the publicly owned urban forest, they have neither the time or in many cases the expertise to construct meaningful strategy documents.
- 1.7. Successful Tree Strategy models from outside the UK all begin with extensive consultation with all stakeholders. Such stakeholders are to be found both inside, other departments and service providers, and outside, business, community groups, charities, friends-groups the local authority. Consultation will facilitate buy in and enable localities to develop their own vision of what their urban forest should look like (See Melbourne Community Strategic plans). It is too late to consult before strategies are finalised. Communities need to be integral to the development of strategy documents.
- 1.8. Statutory Tree and Woodland Strategies will inform and influence other policy areas where trees are a consideration.
- 1.9. TDAG agrees with the suggested content for a best practice guidance but would make the following observations under each of the headings
  - Assessment and valuation of current tree stock: TDAG agrees with the consultation document but would add that it is essential that the same methodology to gather data is used nationally and the same criteria used consistently. The use of the i-Tree system provides the best tool available now and is already being used extensively across the UK. Such uniformity will enable comparisons to be made between different localities and provide uniform data to inform a national tree strategy.
  - Geographical Assessment: TDAG agrees with the consultation document but would add that assessment carried out at ward level provides another level of data, enables comparisons to be made with other social indicators such as areas of deprivation, and highlights urban forest inequities within individual authority boundaries. (See London Borough of Ealing i-tree study 2018).
  - Benefits of Trees and Woodlands: TDAG agrees with the consultation document but would comment that extensive and detailed listings of benefits can become tedious especially if listed repeatedly.
  - Sustainable Tree Management: TDAG agrees with the concept of sustainable tree management but would ask what does this mean in practice?

- Tree Planting: TDAG agrees with the consultation document but would add that tree planting is a long- term project and needs to be carried out consistently and annually if the long- term benefits of trees and an increase in canopy cover is to be realised. Both planting and maintenance needs to be resourced adequately annually and removed from the vagaries of annual revenue budget calculations. Tree planting needs to be planned over decades and not subject to whimsical prestigious headline grabbing short term high number planting programmes such as those recently endorsed by successive Mayors of London. Long-term planning and consistency of demand would enable tree nurseries to plan production and meet requirements such as species diversity and succession. (See Santa Monica, California, USA planting programme). National guidance on tree quality would also assist in achieving successful planting programmes (See BS 8545: Trees: From Nursery to Independence in the Landscape 2014)
- Biodiversity: TDAG agreed with the consultation document.
- Enhancing biosecurity: TDAG agrees with the consultation document.

1.10. A Tree Strategy produced without an accompanying and fully costed management plan is likely to remain 'a wish list.' The formula set out in 'Trees in Towns II for constructing a tree strategy remains as true today as it was in 2008. It is, "What Have we got?" (Assessment), "What do we want?" (Consultation)," How do we get there?" (Management Plan), "How are we doing?" (Review). This is seen as an on-going and repeatable process.

1.11. The success of any strategy and management plan is linked to resources both human and financial without either failure is the likely outcome.

## **2.00. THE DUTY TO CONSULT ON THE FELLING OF STREET TREES.**

TDAG believes this a detail which could be more appropriately and successfully dealt with as a constituent part of statutory local authority tree strategies and management plans. This does not need to be addressed as a separate issue and could prove onerous and unworkable without any strategic benefits being achieved.

TDAG is concerned that this proposal has the potential to be divisive and encourage single-issue, often defensive thinking, while diverting attention away from the key issue of the strategic management of tree populations in the urban built environment.

2.1. TDAG supports the concept of consultation on the felling of street trees and is largely supportive of the exemptions outlined in the consultation document.

2.2. TDAG would ask for further clarification on the 'damaging' exemption as there is no consideration or allowance for the use of engineered or other arboricultural solutions to alleviate the damage while retaining the tree in question. The statement 'to such an extent that it presents an imminent danger' needs to be clarified and strengthened.

2.3. TDAG would ask that the use of valuation tools such as 'CAVAT' be used when considering trees of special historic and cultural influence.

2.4 TDAG is concerned over the use of age, fifteen years, to classify young trees which have been damaged or have failed. It would be more useful to use the accepted and universally used terminology which is stem diameter at 1 metre from the ground. This is a consistent throughout the European Tree Nursery industry and applied universally as a method of classifying young trees.

2.5. TDAG is appreciative of the options given for 'who should be consulted and how' but believes that there is not a need for this to be legislated on nationally. This issue can be addressed if local tree strategies are constructed with full consultation of all stakeholders as outlined in paragraph 1.7 above. Such an approach would be able to consider the vision local communities have for their urban forest and consider local complexities associated

with urban forest management. A 'top down' approach is arbitrary and doesn't allow the flexibility which the composition of local and sustainable management of tree populations require. For example, the tree population of Brighton which is home to the national collection of Elm is entirely different from the demands of many sea-side resorts which have been identified in recent Forest Research studies as having some of the lowest canopy cover figures in the UK.

2.6. TDAG believes that this issue can be best dealt with nationally by making it a statutory requirement that local tree strategies include local agreements on consultation and decide this for themselves in conjunction with their local communities.

2.7. As the burden of consultation will inevitably fall on local authority tree officers who are the link between community, local authority and trees irrespective of the final methodology for consultation agreed nationally consideration has to be given to their professionalism and expertise and the resources made available for them to achieve this objective successfully.

### **3.0. THE REPORTING ON FELLING AND PLANTING OF TREES BY LOCAL AUTHORITIES.**

TDAG believes this a detail which could be more appropriately and successfully dealt with as a constituent part of statutory local authority tree strategies and management plans. This does not need to be addressed as a separate issue and could prove onerous and unworkable without any strategic benefits being achieved.

3.1. TDAG supports the concept of local authorities having to report on the felling and planting of trees and that national government should play a role in collating and managing information.

3.2. The centralisation of such information would facilitate a meaningful national tree strategy. There would need to be a consistency in the range and extent of data collected to make this possible.

3.3. A well-constructed tree strategy with a detailed management plan would capture information of this kind anyway as part of the long-term strategic management of the local tree population.

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