

England Tree Strategy consultation – LTOA written response

8 September 2020

The London Tree Officers Association (LTOA) is grateful for the opportunity to provide a detailed response to the consultation of the English Tree Strategy (ETS). We, as many other stakeholders such as Arboricultural Association, have been equally concerned with the scope and format of the consultation of this document. The approach adopted restricted our members ability to provide effective and informed feedback which would develop the ETS.

There is wide recognition for the importance of urban trees and the multiple benefits they provide such as creating more attractive places to live, supporting people's health and wellbeing, providing and connecting habitat for wildlife and helping us mitigate climate change. Given that 83% of England's population live in towns and cities, the LTOA would have hoped for more detail in the ETS consultation document on these important landscapes. Sadly, in our view the ETS pays a minimal amount of attention to urban/peri-urban treescapes, with limited discussion under the heading of "engaging people". The LTOA is disappointed the ETS states 'we need to ways to better value, plant and protect trees.' The LTOA believe there are already effective ways available, but those professionals are overlooked, or those employed to implement or enforce these are not funded or supported fairly.

The LTOA would also welcome the assurances and an opportunity to comment on the full draft strategy before publication.

Please find our key comments below.

Canopy cover

1. The ETS recognises that tree and woodland strategies which are being produced by Local Authorities demonstrate they value trees as assets. Targets for tree canopy cover are an important component of these strategies. We disagree with the view that these should only be set at the local level and for this document to be bold and part of a fresh domestic approach to land management across our landscapes, the ETS should set standards for the government to drive the changes required within planning and managing our urban landscapes over the next 25 years. At the very least the ETS should be reflect the regional variations with tailored canopy cover targets. For example, London has an existing canopy cover of 20% and the mayor wants to increase this by 10% by 2050.

2. The LTOA support the government's commitment to increase tree/canopy cover and managing trees and woodlands to deliver multiple environmental, social and economic benefits. Our members are influential and committed to maintaining and expanding London's urban forest and fully understand the complexities of these challenges. We have been working with other members of the London Urban Forest Partnership, including the Forestry Commission, on the London Urban Forest Plan. This document will set out the priorities, actions and activities necessary to protect, manage and deliver on the expansion of London's urban forest. This work aligns to the purpose of the ETS and shows there are still opportunities to expand public forest within urban settings. By describing the public forest estate in the ETS as lands which are managed by Forestry England does not recognise or value the significant contributions local authorities provide to publicly owned trees or woodland.

Protecting trees and woodland

3. Local planning authorities can make a Tree Preservation Order (TPO) if it appears to them to be 'expedient in the interests of amenity to make provision for the preservation of trees or woodlands in their area'. Government guidance sets out how to assess amenity and determining expediency, but 'Amenity' is not defined in law, so authorities exercise judgment when deciding whether it is within their powers to make a TPO. Factors include visibility and the public impact of removal. Tightening the criteria for TPOs could improve consistency in the application of the policy and provide the opportunity to include more relevant factors to the environment, such as carbon sequestration. Feedback from LTOA members 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.
4. The ETS touches on strengthening our supply and assuring biosecurity for the UK nursery sector but focuses on forestry sector. The ETS needs to address the differences in the market for trees between forestry and arboriculture. The Plant Health Assurance Scheme is a positive step and we will support this, but this scheme must become widely adopted before it can be considered effective.

5. The LTOA has also been preparing our members for future climate change and are disappointed to see that the ETS again focuses on woodlands and the risks to native woodland/species. Urban areas and the challenges people and trees face has not been considered. There is more of an opportunity to diversify tree species as conditions will differ considerably regionally and within rural and urban settings. Trees must therefore be selected in accordance with the principle of the right tree, right place and put an end to the debate of native v non-native. The right professionals such as Tree Officers should be engaged to determine what is 'right' for the location. Diversifying trees species is necessary to reduce the potential risks from pests, diseases and any impacts from climate change.
6. The ETS states that the majority of tree felling is overseen by the Forestry Commission, this may be the case for timber production but does not reflect the time or resources necessary in comparison to the number of trees felled within urban landscapes where the Forestry Commission will have no involvement. Local authority Tree Officers need to be fairly represented in the discussions relating to protecting trees.

Effective resourcing

7. The LTOA believe it is essential that Local Authorities are resourced effectively to manage urban trees. We welcome the scrutiny of any policy change under the New Burdens process. The LTOA believes a commitment to funding the care and management of our urban trees and woodlands while planting new ones should be recognised in the professional roles of local authority Tree & Woodland Officers/Managers. Resourcing local authorities with appropriate equipment and expertise to deliver in this landscape will enable changes and improvement. The ETS highlights the need to expand the workforce but it is important that this is not just focused on the forestry sector but includes other fields of tree care such as arboriculture and urban tree & woodland management. The LTOA undertook an internal survey of Tree Officer/Managers from 50 local authorities across London and the UK in 2017 and found there had been a fall from 195.5 in 2007 to 167.5 in 2017 suggesting a 14% reduction. Respondents were also asked to provide additional comments. One common issue identified by 25 respondents was increased workload over the past ten years. For community

engagement to be effective and meaningful local authority tree managers need the right resources to deliver while also ensure the health of trees is maintained.

8. Technology is advancing at an incredible rate but there is little discussion within the ETS on how to fund and utilise this to support tree management. Improving the data will help prioritise actions in all areas of tree management from identify gaps in canopy cover, controlling pests and diseases and engaging the community. For there to be meaningful change baseline tree data needs to be accurate from the local to national level.
9. The funding provided to local authorities for managing trees varies, so there is no consistency in the investment for tree management. Many local authorities will not be able to support UK tree nurseries if they expand without sustained financial support. The Nature Recovery Fund is a positive step though, we understand, no proportion of the £25 million will be available for urban areas.
10. The LTOA will continue to support the planting and establishment of new urban trees on streets, parks, housing estates and brown field sites but believe the ETS should not overlook the ongoing burden of maintenance associated with existing trees. The ETS states it welcomes views on how to overcome barriers to establishing and maintaining street trees to support the effective maintenance of existing urban trees. Commuted sums through the Highways Act 1980 is a solution for the management of some new street trees but the LTOA believe this will have a limited impact on maintenance budgets for existing trees. The LTOA supports the need to address these challenges but they are complex, we would welcome the opportunity to discuss in greater detail before the ETS document is published.