



England's trees, woods and forests: a consultation response

The response of Warwick District Council to the Government's consultation on England's trees, woods and forests



Introduction

This response to the government's consultation "*England's trees, woods and forests: a consultation document*" is made on behalf of Warwick District Council. It has been prepared under delegated powers by the Council's Strategy Officer (Arboriculture), Chris Hastie MICFor, FArborA, in consultation with the Portfolio Holder for Cultural Services, Councillor Balvinder Gill, and the group representatives on the Council's Tree and Woodland Strategy Working Party, Councillors Martyn Ashford (Lab), Eithne Goode (Lib), Christine Hodgetts (Ind) and Norman Pratt (Con).

General Observations

The consultation document is generally well considered and well rounded, rightly placing great emphasis on the social benefits of trees as well as the more traditional environmental and economic ones. However, in dealing with social benefits it seems to concentrate far too much on urban and urban fringe woodland in a traditional sense, and too little on the benefits of the wider urban forest.

Including urban trees

Most of the population of England live in towns and cities and the trees that have the greatest impact on their lives are those in towns and cities. It is clear from the contact that urban tree managers have with the public that the trees of greatest concern to them are not woodland trees, but individual trees, and in particular individuals street trees.

Outside of the UK there is a considerable and growing body of research demonstrating the considerable benefits that urban trees bring. These range from pollution interception¹ to attracting inward investment² to reducing levels of crime³, even helping with attention deficit disorder⁴. These benefits are considerable and delivered directly to the urban populations of England.

That a strategy consultation purporting to be for "England's trees, woods and forests" restricts its consideration of urban trees to one paragraph is of considerable concern. That that one paragraph says little other than that management of urban trees is an issue for local decision making appears to be an attempt to side step this important issue.

The very fact that responsibility for woodland and forests sits with DEFRA whilst most responsibility for urban trees sits with the DCLG is a difficulty in itself and this opportunity should be taken to re-evaluate this position. It may be appropriate, given the other responsibilities of the two departments, to continue with this separation. But closer and more joined working is desperately needed. A strategy for England's trees, woods and forests should ensure that it is inclusive and covers all trees in England. To that end, whilst urban trees continue to fall within the remit of the DCLG the DCLG should be as involved in the strategy's preparation as DEFRA.

¹ Eg: Hewitt, N, Stewart, H, Donovan, R and MacKenzie, R, undated. *Trees and Sustainable Urban Air Quality*, Research summary from Lancaster University at <http://www.es.lancs.ac.uk/people/cnh/docs/UrbanTrees.htm>

Nowak, DJ, undated. *The Effects of Urban Trees on Air Quality*, USDA Forest Service, Syracuse, NY

² Eg: Wolf, K, 1998 *Trees in Business Districts - Positive Effects on Consumer Behaviour*. University of Washington College of Forest Resources, Factsheet #30.

³ Eg: Kuo, FE and Sullivan, WC, 2001. *Environment and Crime in the Inner City. Does Vegetation Reduce Crime* [in] *Environment and Behavior* **33**(3), pp 343 - 367

⁴ Eg: Taylor, AF, Kuo, FE, Sullivan, WC, 2001. *COPING WITH ADD - The Surprising Connection to Green Play Settings* [in] *Environment and Behavior* **33**(1), pp 54 - 77

The Questions

The role of Government

Q1 Do you agree with these principles and objectives of Government intervention in trees, woods and forests? If not, what principles and objectives should guide Government intervention?

In general both the principles and objectives are good. However, the emphasis given in some of the surrounding text is of concern. In particular, paragraph 22:

“recognising that any Government support for the management or products of both farmland and woodland must be justified in terms of wider public benefit.”

This appears to completely disregard the urban forest and the possibility of government support for urban tree care, despite the high potential for public benefit to be realised through greater support for urban trees.

Q4 Do these seven types of intervention adequately express Government's role in supporting trees, woods and forests?

The detail of the seven types of intervention misses many opportunities to improve the condition of the urban forest.

Research

Research funding is currently heavily focused on the commercial forestry sector. There are many threats and challenges facing urban tree management at the present, and very little evidence on which to base management decisions. In a strategy that seeks to acknowledge the social benefits of trees and woodlands it is essential that greater emphasis is placed on supporting urban trees and that commitments are made to increasing funding of research into issues that are of particular importance in the management of urban trees.

Some areas that need research include:

- Effective, sustainable ways of identifying and managing vegetation related subsidence
- Cost effective, sustainable ways of managing risk associated with urban trees, including the relationship between different weather types, site use rates and tree failure rates
- Social and economic benefits of urban trees – there is a reasonable body of US based research but little has been done in the UK.
- The impact of climate change on the urban forest
- The public's perception of urban trees

Purchasing public benefits

When considering purchasing public benefits, the considerable benefits brought by non-woodland urban trees have all but been forgotten. Funding for urban tree management is in crisis. The slow rate at which this becomes evident and the slow speed at which purchased benefits come to fruition make it extremely difficult to get these issues recognized as a priority by local politicians. There is a need for national intervention in the funding crisis facing urban tree management.

The Forestry Commission

Whilst the Forestry Commission is indeed a repository of skills and expertise in woodland management, it is a key failing of the Commission that it has a lack of skills in the management of urban non-woodland trees. The focus of the Commission has changed much in recent years, and its flexibility in adapting to a changing market and changing social needs is to be applauded. However, it remains very much focused on woodland, and thereby on rural and urban-fringe sites. The considerable resources of the Commission in terms of

grants, research and expertise are largely unavailable to those involved in urban tree management.

The strategy needs to focus more on urban tree management, and if the Forestry Commission is to be the principle delivery body, the Forestry Commission needs to adapt to enable it to deliver objectives related to urban tree management.

Q5 Do you think we have got the balance right between the way national priorities will be expressed in the new Strategy and the scope for regional delivery to respond to local needs and opportunities?

On the whole, yes. However, given the difficulties in securing action at a local and regional level because the time scale for change is so much longer than the elected terms of politicians, it is important that there is a clear direction from national government.

Environmental sustainability

Q6 Do you agree that creating new woodland solely for the purpose of carbon sequestration is not a national priority for forestry policy in England?

Yes. There is little evidence that creating new woodland for carbon sequestration is an effective way of addressing climate change. It does not help the aim of creating woodland for its other benefits or the aim of addressing climate change to continue promoting a flawed argument.

Q9 If we are to achieve the substitution of woodfuel and timber for less sustainable fuels and products:

i) what, if any, are the barriers to progress?

The principle barrier is the lack of a production and distribution infrastructure for processed fuels.

Adoption of wood fueled systems is slow because of the erratic availability of fuel. Increase in production of wood based fuels is slow because of the lack of a developed market or an infrastructure to distribute to that market. A leap needs to be taken and government, both national, regional and local, is an excellent position to take this leap through a focused drive to move publicly owned buildings over to wood based heating or CHP systems.

ii) what areas of activity e.g. skills, co-operatives may need attention?

Again, principally the processing and distribution infrastructure.

Q11 Do you agree that it is a national priority to understand how we must adapt our woodland management to ensure that woodland can continue to deliver the full range of benefits in a sustainable way as the climate of England changes?

Yes, extending that statement to include non-woodland urban planting.

Q12 Do you agree that it is a national priority to understand how we can use tree and woodland cover most effectively to manage water resources, protect soils and buffer against air pollution?

Yes. Since most air pollution is concentrated in urban areas it is particularly important to address the question of how urban planting can contribute to improving urban air quality.

Q13 How and where could other Government policies contribute to delivering our biodiversity aims for trees and woodland?

Clear guidance clarifying the position relating to Tree Preservation Orders and their use in protecting trees of nature conservation value is needed.

Paragraph 91 of ODPM Circular 06/2005 / DEFRA Circular 01/2005 needs strengthening further to make it clear that biodiversity and wildlife importance are valid reasons in their own right for justifying a TPO. Paragraph 3.2 of the former DETR's "Tree Preservation Orders – A Guide to the Law and Good Practice" needs to be rewritten to clarify this.

Guidance suggesting that dead wood is not protected by TPOs should be revisited. The wording of the legislation refers only to dead trees being exempt. The assumption that this means that dead wood on otherwise live trees is exempt needs to be questioned.

PPS9 clearly has a major role to play supporting aims on biodiversity. The revision of PPG3 also has considerable potential to have an impact on biodiversity, and indeed on tree cover in general, as do the provisions of PPS17.

Q15 Do you agree that restoring open habitats by carefully targeted deforestation should be a national priority where this makes a significant contribution to the Government's biodiversity policies and to UK BAP targets?

Yes

Q16 How and where could other Government policies contribute to delivering our landscape aims for trees and woodland?

A very significant contribution to the urban landscape is made by street trees in public ownership. The proximity of street trees to both public highways and people's homes means that they tend to require more intensive maintenance than most trees and to attract greater attention, both positive and negative, from the public.

Funding for street tree maintenance is poor in most authorities. Replanting is often difficult because of the amount of the underground plant in pavements and verges. Further constraints are placed on replanting by increasingly cautious highways requirements for vision splays, distances from the carriage way etc. There is a real danger that aging street tree populations will not be replaced because of funding and planting difficulties. Government needs to ensure a greater degree of joined up thinking – that policies formulated for highways do not overlook the need to ensure continuity of street tree cover.

A further threat to trees in the urban landscape is the perception that they are unpopular, formed largely by the fact that managers' main contact with the public comes when they have complaints. Recent research is suggesting that this view is incorrect and that the public value street trees. Further research is needed in this area to determine what sort of planting is most wanted by the public and to assess the extent to which the public perceives it gains benefits from urban street trees.

Q17 How can Government best support its delivery partners in achieving these aims?

By ensuring that policies in other areas (eg highways) do not constrain tree planting excessively.

By ensuring that funding for research into the public perception of trees and the benefits of trees is available.

By ensuring that local decision making is done within the context of a clear national policy framework that stresses the importance of active management of urban trees.

Social sustainability

Q18 Do you agree that:

- *promoting public access to woodland should remain a national priority*

Yes

- *improving public access to woodland is a matter for regional and local decision makers to consider where there is unsatisfied demand?*

Yes, within the framework of clear national priorities.

Q21 Do you agree that provision of high quality facilities for public recreation in publicly and privately owned woodland is a national priority?

Yes

Q22 Do you agree that it should be a national priority to promote the role of trees and woods within a network of green infrastructure in and around our towns and cities?

Yes

Q23 Do existing policies, mechanisms and resources adequately support planting and management of trees and woodlands as part of a green infrastructure? If not, what changes are needed?

No.

PPG3 is too open to interpretation. Despite clear statements relating to the 'greening' of developments, the emphasis on higher density developments tends to get put ahead of any policy guidance on ensuring a green infrastructure.

Resourcing is inadequate to ensure the continuity of a green infrastructure, particularly in the area of street tree maintenance.

There is insufficient scope for local authorities to gain additional off-site tree planting from developers proposing high density developments. Whilst achieving some planting within the site is clearly possible through the imposition of conditions, current guidelines do not readily allow for off-site planning gain.

Q26 Do local authorities have access to the expertise, resources and technical support they need to manage our urban tree stock?

On the whole local authorities have access to the expertise needed to manage the urban tree stock. However, they do not have access to an adequate evidence base for making informed decisions because of the paucity of research which is directly relevant to urban tree management in this country.

Resources are generally inadequate. Funding levels are largely locally determined and not seen as priorities because of the slow rate at which any return on expenditure becomes apparent. It is difficult to convince decision makers elected for a four year term of the importance of management of trees with a 120 year life cycle.

Economic sustainability

Q30 Do you agree that all government support for sustainable woodland planting and management should be based on delivering the environmental, social and other public benefits of sustainable forest management, including the production of renewable energy and the economic regeneration of lagging rural areas?

Yes. However, that support should be extended to 'amenity' or non-woodland planting in urban areas. Such planting can also bring significant environmental, social, economic and other public benefits and does so closer to the vast majority of the population.