

## 1 Introduction

1.1 The Arboricultural Association is a charity and membership organisation which acts as the professional voice for the arboricultural industry in the UK. It has more than 3000 members including tree officers, consultants, contractors and representatives from every part of arboriculture across the UK and beyond, and it delivers vital services such as training, events, best practice guidance documents and the accreditation schemes for Approved Contractors and Registered Consultants. The Association is based in Stonehouse, Gloucestershire and has branches across the country as well as being an influential voice in the international arboricultural community. The role of the Association is to promote not only the importance of trees, but the value and importance of those who work with and care for trees.

1.2 The Arboricultural Association is pleased to have the opportunity to contribute to this EFRA Inquiry into tree planting. In recent months, the Association has made submissions on behalf of its members in response to the consultations for the England Tree Strategy and Planning White Paper. This Inquiry evidence submission contains summaries of many of the observations and concerns which were made in response to those two consultations. Of the questions provided by EFRA in the call for evidence the Association feels that three are particularly relevant to our members. These are questions 1, 4 and 6. Questions 1 and 4 relate very closely to one another and they have therefore been answered together.

*1) Are the UK Government's targets for increasing forestry coverage, and tree planting, for England and the UK sufficiently ambitious and realistic?*

*4) Why were previous ambitions for increasing tree planting in England not met and what lessons should be learned?*

## 2 Arboriculture is a standalone discipline

2.1 The phrasing of question 1 reveals one of the key problems inherent in the government's rhetoric about trees, by lumping 'forestry' and other 'tree planting' into the same sentence. Whilst tree characteristics such as biology are broadly the same regardless of location or purpose, all trees are not the same, and using 'trees' as a catch-all term is not always helpful. Arboriculture and forestry both deal with trees in the same way as veterinary science and livestock farming both deal with animals – each is a vital industry and skilled discipline, but they approach their subjects in different ways and for different purposes. Each industry has a yield; in forestry this yield is predominantly timber production, whereas in arboriculture the yield is public benefits.

2.2 Arboriculture is a distinct specialism which concerns itself with the science and practice of the cultivation, establishment and management of amenity trees for the benefit of society. The importance of this distinction goes beyond semantics. Urban trees – those in the areas where some 83% of the population of the UK live and work – are critical infrastructure which bring environmental, social and economic benefits to millions of people. However, their numbers and disproportionate importance are inevitably lost when they are combined with the vast areas dedicated to forestry. This problem is well illustrated by the consultation document issued for the *England Tree Strategy*, which barely mentions urban trees, fails to include the word 'arboriculture' once and which in its proposed form should be renamed the *England Forestry and Woodland Strategy*. It is critical that the distinction between arboriculture and forestry is acknowledged.

### **3 Tree planting targets are not always desirable**

3.1 The question as to whether or not the targets are sufficiently ambitious and realistic presupposes the answer to an equally important question – are the targets desirable? The quantities of trees being promised essentially amounts to new plantations. It is not always appropriate to seek the greatest number of new trees in any given space. Open-grown trees are one of the most important habitats there is, not to mention their value in carbon sequestration. Many of our most important ancient and veteran trees are in fact open-grown specimens. It may well be possible to plant ten thousand trees in an area the size of a football pitch but is it desirable to do so where perhaps only half a dozen would be more appropriate for the long term? When dealing with trees it is important to think in tree time, which does not confine itself to the political cycle or human scale. If there are to be mass tree planting targets then they need to be strategic and joined-up rather than just a series of escalating numbers.

3.2 Using the term ‘tree planting’ to cover woodland creation, forestry plantations and the expansion of the urban forest is unhelpful in the extreme. For woodland creation it may be more appropriate, cost effective and environmentally sustainable to use natural regeneration rather than mass tree planting. It may be most appropriate to focus planting efforts on whips, perhaps prioritising native species. In an urban area this approach is unlikely to work. The perceived, and often-mistaken, distinction between native and non-native should be disregarded; a diverse urban forest is essential in order to mitigate the risk posed by pests and diseases and climate change and to maximise the benefits the urban forest can deliver. In parts of the world such as Florida or Papua, where there are hundreds of native trees to choose from, it might be appropriate to confine species selection to native trees. In the UK, where there are no more than 40 native trees, few of them suitable for selection as a large-canopy urban species, it would make no sense whatsoever.

3.3 In urban areas it is typically necessary to plant trees at a size far larger than whips. Under current circumstances these will in all likelihood be imported into the UK at some stage of their life rather than being UK-grown – this is absolutely fine as long as strict biosecurity measures, perhaps involving an appropriate period of quarantine, are observed. If the ultimate aim is to move towards an increase in the proportion of urban trees which have been grown in the UK then there must be a significant investment into the nursery industry to enable them to expand their production and grow more trees from seed. This will require guarantees on the part of the public sector that these trees will be purchased and planted when available. The timescale to produce a 12-14cm tree for planting in an urban area is a minimum of five years, and the larger the tree required, the longer the process takes.

3.4 When undertaking new tree planting projects, it is vital to consider green equity and to do everything possible to ensure equal access to trees and green space for all. Green equity can be defined as fair access to, and governance of, urban forests regardless of differentiating factors such as socioeconomic status, racialization, cultural background or age (see Nesbitt, L. *et al* (2018)). The dimensions of urban green equity: A framework for analysis. Urban Forestry & Urban Greening, V34). Simply put – we know that trees bring benefits, but are those benefits being enjoyed by all? It is also important to note that the answer to improving green equity issues is not simply to increase tree planting in more deprived areas; there are more complex factors around structural representation and community engagement etc. which must also be addressed.

### **4 Tree establishment is as important as tree planting**

4.1 The recent trend for mass tree planting and ever-escalating targets masks the reality that the act of putting a tree in the ground is only one small part of a decades, or even centuries-long, process

which includes nursery production, planting specifications, young tree maintenance, inspections and long term tree care. We must ensure that trees are established rather than just planted; there is little value in spending millions of pounds in planting trees which never make it to maturity. And at every stage of the lifecycle of a tree in an urban area there should be appropriate involvement from the relevant arboricultural professional. And, like purchasing, planting and establishing a new tree itself, the funding required to properly train and support these professionals should be seen as an investment, not a cost.

4.2 The concept of 'right tree, right place' still stands, although it is often overused and frequently misunderstood, with some failing to appreciate the importance of professional arboriculturists in deciding what is the right tree and where is the right place. The drive for mass planting – an inevitable consequence of ever-escalating tree planting targets – risks ignoring the nuances of location, species, provenance, quality, establishment and long-term maintenance etc. and focuses only on the numbers going into the ground.

*6) Are the right policies and funding in place to appropriately protect and manage existing woodlands in England? How will prospective changes to policy and legislation effect this?*

## **5 The Planning White Paper**

5.1 We fully acknowledge the importance of housing and development. Houses are critical infrastructure for people and for society, but so are trees and green spaces. The social, environmental and economic benefits of trees are increasingly well understood, and the ongoing COVID-19 pandemic has only served to highlight the importance of trees and other green infrastructure to the physical health and mental wellbeing of our communities. It is therefore essential that trees are seen as a key part of development, to be fully integrated into grey and blue infrastructure. A lot is said about the importance of planting the right tree in the right place, but we must also create the right places for the right trees.

5.2 The proposed changes to the planning system as described in the *Planning for the Future* White Paper create some significant opportunities, but also considerable risks. In the race to 'build, build, build' it must be remembered that not all 'red tape' is there to be cut – much of the planning infrastructure that has evolved over the last few decades serves to protect our environment and, whilst improvement is always possible, it should not all simply be swept away. Tree counters, like newt counters, play an important role in preserving the health of our environment for current and future generations, and in the fight against the climate and biodiversity emergencies. They must not be disregarded.

5.3 The Planning White Paper raises multiple concerns from an arboricultural perspective. The document certainly gives the visual impression that urban trees are important – it contains 42 photographs of outdoor areas, 36 of which feature trees – but trees are actually mentioned in the text just six times in 84 pages. This suggests that trees are still seen by many as an adornment rather than regarded as critical infrastructure. The Arboricultural Association made five key points in response to the Planning White Paper consultation:

- There should be a statutory obligation for all Local Authorities to employ in-house tree officers.
- Tree planting is important, but establishment is key.
- Existing trees must be given adequate protection.
- Local consultation for planning applications must not be replaced by local plans.
- Increased digitisation of data must support, rather than replace, the existing system.

## 6 The importance of arboricultural professionals

6.1 It is encouraging that in recent years the profile of trees has increased so much in the political and public mind. However, arboricultural professionals are still not recognised as being essential to the success of the urban forest. Arboriculture remains an unregulated industry and it is still possible for anyone in the UK to purchase a chainsaw and immediately call themselves an arborist. This is detrimental not only to the reputation and confidence of the profession, but to the health of the urban forest as a whole. The England Tree Strategy makes the observation that there is a workforce and skills shortage in forestry; for the future of the urban forest it must be recognised that the same problem is faced by the arboricultural industry as well.

6.2 All parts of the arboricultural industry are important in protecting and managing existing trees, but the role of the Local Authority tree officers – the custodians of the urban forest – is particularly crucial. The Planning White Paper correctly identifies the need for Local Authorities to have the right people with the right skills, and it is a positive step to see acknowledgement from government of the detrimental impact of budget cuts in recent years. If the proposed policy framework relating to trees – including the Planning White Paper and the England Tree Strategy – is to be successfully implemented, then appropriately qualified and properly resourced tree officers should be employed by every Local Authority in the country, without exception. A healthy population of urban trees requires a healthy population of urban tree officers, and any administration which claims to care for trees must acknowledge the importance of the professionals who care for those trees.

### Contact and further reading

For more information please contact Arboricultural Association Technical Director John Parker at [john@trees.org.uk](mailto:john@trees.org.uk)

The full Arboricultural Association responses to recent government consultations, including questionnaire answers and covering letters, can be found here:

England Tree Strategy: <https://www.trees.org.uk/News-Blog/Latest-News/Arboricultural-Association-England-Tree-Strategy-r-en>

Planning White Paper: <https://www.trees.org.uk/News-Blog/Latest-News/AA-Responds-to-Planning-White-Paper>