

## Written evidence submitted by the Ancient Tree Forum (FOR0070)

The Ancient Tree Forum (ATF) has pioneered the conservation of ancient and veteran trees and is the main UK organisation concerned solely with their conservation. The ATF seeks to secure the long-term future of ancient trees through advocacy of no further avoidable loss, good management, the development of a succession of future ancient trees, and seeking to raise awareness and understanding of their value and importance. The ATF campaigns for UK Governments to recognise their international responsibilities towards the amenity, biodiversity and heritage provided by ancient trees.

This Inquiry is too narrow in its scope and lacks recognition that 'forestry' is just one element of England's tree economy and benefits and these should be considered holistically. Policy concentration on forests and woodlands (narrowly interpreted) and compartmentalisation significantly underplays the importance of these other elements and has had damaging consequences for their protection and sustainability. Integration of policies for all trees and woodlands wherever they are has been highlighted as lacking by the Natural Capital Committee.

There should be a single body with an overview and overarching policy responsibility for trees, especially trees of special interest, all types of woodland, wood pasture and parkland, traditional orchards, other treed habitats, and forests and decaying wood to ensure integration

### Summary

- Urgent production and dissemination of guidance to prevent further inappropriate planting, especially with government grants, and removal or management of already planted trees should be implemented
- Knowledge and use of the ATI and EN data should be widely promoted to land managers grant providers and regulators and high priority support given to the collection and analysis of further data
- Comprehensive data is required of England's tree resource (woodland and all other) quantitatively and qualitatively and attrition rates to enable a balanced evaluation of all their multiple benefits to inform policy.
- The unique responsibility that England has in respect of the conservation and care of ancient and veteran trees should be recognised and taken into account across all policy areas, and resources provided commensurate with their value including grants for their owners.
- Every Department or NGO having any responsibility for these trees should have appropriately knowledgeable staff to manage, advise, allocate and oversee the effective use of grants or other resources and administer regulatory functions.
- Current policy, grants and legislation are failing to conserve irreplaceable ancient and veteran trees and their unique habitats, many of which are in a critical condition. Urgent action across all these areas is required if our unique legacy is not to be lost. Supporting and managing a statutory Register to recognise and celebrate nationally special trees would be a simple start, but with potential to bring about positive intervention to stem losses.
- Biosecurity should continue to be a high priority, plus research on diseases, prevention and management including non- forestry species and sites.

- Research is needed to establish best techniques and management practices appropriate to conservation of ancient and veteran trees in woodlands for incorporation into UKWAS.
- Research for the improved management and conservation of veteran trees generally is urgently needed and should be supported if they and all their values are not to be lost.

## 1 Increase the level of tree cover

1.1 The mantra the right tree in the right place and space should continue to lead decisions about tree planting. Habitats already rich in biodiversity, especially those with a predominance of light demanding tree and shrub species, should not be negatively impacted by tree planting. This specifically includes not intra planting in wood pasture or close planting to woodland edges, hedgerow or scattered trees to the detriment of existing trees and their associated wildlife. Ancient and other veteran trees derive many of their values from being open grown and widely spaced. Planting too close is a serious threat from shading leading to loss of habitat for specialist organisms and the trees themselves. Urgent production and dissemination of guidance to prevent further inappropriate planting, especially with government grants, and removal or management of already planted trees should be implemented.

1.2 To make correct decisions on planting comprehensive data is required on the location of important habitats including veteran trees and all existing wood pastures, including traditional orchards and parkland. Data on relict wood pastures and parkland is particularly important as sites for restoration by appropriate planting. Despite their importance as priority habitat, it has been charities and citizen science volunteers who have initiated collection of essential data. The Ancient – and other special -Tree Inventory (ATI) data, formerly the Ancient Tree Hunt, is held by WT (<http://www.ancient-tree-hunt.org.uk/>). Natural England has a provisional inventory of wood pasture and parkland. Neither are complete and more detailed survey and evaluation is necessary. FC funded the initial stages of the ATI and NE projects and government should now recognise the importance of this data to inform and carry weight in policy. Knowledge and use of existing data should be widely promoted to land managers and grant providers and high priority support given to the collection and analysis of further data.

1.3 Tree planting should aim to achieve the widest possible range of types and scale of tree and woodland cover. As it is now widely accepted that trees, woods and forests have many values, it is regrettable that the current focus is primarily on productive forestry. Other approaches can also offer much in delivering a wide range of public benefits.

1.4 Approaches such as lower density tree cover, agro-forestry, new forms of wood pasture, or allowing natural regeneration may be less productive in timber terms but the costs of establishment are lower and deliver high value ecosystem services. This should be a priority in areas of known concentrations of special ancient and other veteran trees to develop better, bigger, more landscape scale initiatives, such as rewilding, around core habitats of local, regional and national value. The priority should be to build on existing ecological networks and establishing new networks where they don't currently exist

1.5 Tree planting should be integrated with Defra's 25 year environment plan and any replacement for CAP. Choice of species intended to promote resilience against climate change or pest and diseases may be counterproductive to biodiversity conservation and is based on a view that the value of forests and woodlands is primarily their timber value. ('Biodiversity Risks of Adopting Resilience as a Policy Goal' 2016 Adrian C. Newton. Journal of the society for Conservation)

## 2 Improve management of private and public forests

2.1 The protection of soil health and restoration of damaged soils is fundamental to the health, productivity and longevity of trees. As the House of Commons Environmental Audit Committee has recognised (2016-17) “We must move away from viewing soil merely as a growth medium and treat it as an ecosystem in its own right”. This should be reflected in a re-assessment of best practice in forestry, woodland and other tree management across the board and incorporated into UKWAS and other relevant standards and good practice guidance.

2.2 The retention of decaying wood is an important component for replenishing soil nutrients, maintaining healthy soil microbial communities and other biodiversity. ATF is concerned that the importance of this aspect of the UKWAS standard is not sufficiently understood or adequately complied with. More should be done to increase understanding and compliance and preferably increase minimum requirement of this priority habitat across all woodland and forests.

2.3 Ancient and veteran tree populations are found within planted forests or secondary woodland. Some very important sites such as Sherwood and Savernake have been identified. Action is urgently required to properly manage sites such as these to protect appropriate root areas during forestry extraction, release from competition and maintain appropriate levels of light, for the survival and continuity of these trees. Ideally they should be restored to their former land use type and they should be the core from which better, bigger landscape scale, sustainable habitats can be developed as per the Lawton Report recommendations.

2.4 As the data on presence of ancient/veteran trees within forests and woodlands is incomplete, especially small and unmanaged woodlands, there are likely to be more sites to be identified. As described at 1.1. such trees can be highly compromised. It is therefore urgent that ancient and veteran trees in existing woodlands /forests are identified and appropriate management encouraged and supported to prevent their loss.

2.5 There is an urgent need also to restore and manage ancient parkland, a much overlooked but extremely valuable aspect of our natural heritage. The tree populations in these sites are declining (including those celebrated in the tercentenary of Capability Brown’s birth) and at great risk of loss due to a range of iterative and cumulative factors. There is little or no policy for restoration of the tree aspects of historic parks and gardens except in very high value locations eg Blenheim or Chatsworth. The tree aspect of historic parkland is often overlooked due to the lack of integration between government departments responsible for different aspects of heritage, biodiversity and planning

2.6 It is acknowledged that there are many unmanaged or undermanaged, often small, woodlands in private ownership of great habitat value. The reasons for this eg difficult terrain, lack of suitable contractors and equipment, withdrawal of grants, need to be given more attention. This could deliver environmental and economic benefits eg wood fuel.

## 3 Balance woodland protection, including of ancient forests, with economic exploitation, including as an energy source;

3.1 Some economic exploitation activities and management methods are fundamentally damaging, non-sustainable and incompatible with protection of woodland or other wooded habitats.

Exploitation whether for recreation or other economic activities can cause direct damage eg car parks, roads, visitor facilities and increased footfall as well as through increased risks to trees and habitat eg health and safety, biosecurity, and costs to manage. Full cost benefit analyses prior to undertaking new or increased activity should be required together with research and advice on damage avoidance and mitigation methods.

3.2 An overemphasis on the economic exploitation of forests could see a reduction in the provision of other environmental services, where these also impact cultural services they may be a decline in benefits to society of ancient woodland and other priority habitats. It should be a requirement to demonstrate no negative impacts on high value trees and priority habitats of proposed economic exploitation for energy or otherwise.

3.3 Current policy focusses on woodland trees. England is unique in Europe in having a large proportion of big, old trees and particularly ancient oak and yew many of which are in non forested treed landscapes and are a very important component of England's natural capital. Their contribution to landscape, the recreation and tourism economy, especially heritage is incalculable. These values would be compromised by many if not most activities directed at economic exploitation. Old trees provide unique cultural and exceptional biodiversity benefits as well as all other benefits to society provided by trees generally eg soil quality, carbon sequestration, pollution and heat mitigation especially in urban areas and alongside roads and reducing flood risk. Larger, older trees contribute more to these general benefits, further underlining their enhanced value compared to other trees. Data used to inform policy either has an overemphasis on quantitative data (tree numbers or area of woodland) or overlooks qualitative data thereby failing to provide a complete understanding of the resource or the relative contributions of different elements to the wider economy.

3.4 We know from the ATI that these trees are located in key situations and that their condition is worsening from land use change, soil damage, pollution, the presence of increasing pests and disease etc. The priority must be to improve their condition and not to add stresses which could lead to their loss.

3.5 Energy can come from other sources not yet fully exploited such as well managed and new wood pasture/agro forestry, coppice systems and hedgerows whilst protecting their special qualities, especially their decaying wood habitat. However, increasing use of trees for wood fuel needs to be monitored in case of unforeseen issues eg damaging management activities or increased mammal damage etc.

4 Provide a strategic framework, including fiscal and regulatory regimes, to support forestry businesses

4.1 There should be improved recognition and support for the management of high value trees and treed habitats for the acknowledged benefits they provide, not just forestry businesses.

4.2 The unique responsibility that England has in respect of the conservation, care and continuity of ancient and other veteran trees should be recognised and taken into account across all policy areas, government departments, and resources including grants provided commensurate with their value. The current system is failing to conserve these irreplaceable trees and their increasingly rare species and habitats, many of which are in a critical condition. Urgent action is required if our unique legacy is not to be lost.

4.3 The 'State of Nature Report 2016' and our own experience shows continuing losses of ancient and veteran trees and their associated habitats and wildlife whether from development, major infrastructure, forestry or agricultural activities. This underlines the pressing need for better protection targeted at the most vulnerable and precious irreplaceable habitats such as Ancient Woodland and ancient and veteran trees. Felling licence regulation is largely ineffective outside woodlands and has inherent limitations. This should be addressed.

4.4 Most other European countries have much more progressive protection and incentive measures for special trees and treescapes of historic interest because their importance is recognised. The public clearly do recognise these values as evidenced by support for the Ancient Tree Hunt and the Very Important Trees Campaign – calling for a statutory Register to recognise and celebrate nationally special trees. Yet the UK and devolved governments have failed to embrace any such initiatives or recognise their true and significant natural capital value in any meaningful way. Supporting and managing a Register would have modest resource requirements but could be hugely significant raising awareness of and the profile of nationally special trees, help to focus resources on their care and arrest their loss and decline.

4.5 Protection measures including enforcement sanctions need to be effective, but should operate largely as a backstop to prevent wilful or deliberate losses. Much damage is done through lack of awareness of the values and vulnerabilities of trees and habitat. Notification systems similar to Conservation Area notification should be considered. These enable proposals for works to be made known ensuring good practice by advice and support and agreements made without the need for overly bureaucratic licencing or permissions.

4.6 Regulation is often regarded as an obstacle and burden. It needn't be if linked to accessible good, clear advice, support for owners and streamlined systems allied to experienced and empowered staff to administer.

5 Provide grants and advice that incentivise the sector to deliver multiple economic and environmental benefits

5.1 The call for a Charter for Trees, Woods and Forests led by the Woodland Trust demonstrates the need for improved recognition of support for and protection of environmental and public benefits delivered by trees and woods by government.

5.2 The environmental and public benefits of owning and managing woodland and trees in the wider countryside must be identified, then ways of resourcing their long term management found. These specific and targeted benefits might then be 'rewarded' and value for money secured.

5.3 Good quality, professional technical advice and training for the management of forests, all types of woodland and veteran trees (including recognition, valuing and locating them) and should be widely available to owners, managers and advisors. This might be supplied from a range of sources, private individuals, charity or government agencies, and suitably resourced.

5.4 There should be better grants for parkland, wood pasture, hedges, orchards and agroforestry and individual trees to recognize their enhanced contribution. Each individual open crowned tree provides 20 times the ecosystem benefits of a single plantation tree eg biomass above ground and nutrients returned to the soil. Grants should be available for all owners of high value trees and sites for specialist advice and to promote good practice.

5.5 Revision of CAP must remove the discrimination against wood pastures which has allowed, damaging land management practices, incentivised removal of trees and conversion to forestry.

(‘Europe’s wood pastures: condemned to a slow death by the CAP?’ European Forum on Nature Conservation and Pastoralism, October 2015).

5.6 A CAP revision should also identify the value of multifunctional land-use such as agro-forestry and offer a more flexible approach to incentivising woodland creation, including new wood pastures. It should offer opportunities to deliver landscape scale changes, eg incentives for landowners to work together collaboratively. A new scheme might also consider identifying cheaper methods of establishing trees, opportunities to build on existing ecological networks and establishing new networks where they don’t currently exist.

6 Ensure there is the right research, including into management of pests and diseases, which is well integrated into policy development

6.1 Biosecurity must continue to have high priority, firstly to prevent introduction of pest and diseases and then internal measures to effectively control including allocating financial and other resources eg OPM .

6.2 Research on tree health issues should give appropriate allocation to non forestry species and locations according to their values and benefits especially ancient and veteran trees. Also diseases like powdery mildew on oak which is a significant problem for the vitality and management of veteran oaks.

6.3 ATF have produced a position statement on ash die back setting out our approach to research in this area. <http://www.ancienttreeforum.co.uk/wp-content/uploads/2015/02/ATFD-Chalara-Position-Statement-FINAL-02-05-20141.pdf>. This is in line with our view that it is not sufficient to research the disease/pest organisms, but to consider the whole tree and ecosystem health including soils holistically taking into account environmental factors, contribution of stresses etc. A better balance of resources should be determined on this basis.

6.4 Priority should be given to finding and testing treatments, preferably, non- chemical whole system treatments, for pest and diseases eg compost tea, mulching. These treatments which alleviate or reduce stress and aid natural recovery of functioning soil ecosystems, enable trees to operate their own long evolved strategies for responding to pests and diseases and are proving effective in some cases eg Acute Oak Decline.

6.5 Research is needed to establish best techniques and management practices appropriate to conservation of ancient and veteran trees including mitigation of potential damage in woodlands for incorporation into UKWAS standards.

6.1 Government appears to have abandoned research on non- forestry tree management regrettably, despite the acknowledged values. The ATF has identified topics requiring additional research to aid the management of veteran trees in its publication ‘ Ancient and other veteran trees: further guidance on good practice’ Ed David Lonsdale on topics such as specialist survey, soil ecosystem, management practices for the tree and its rooting environment eg mulching.

6.2 Monitoring condition of trees, woods and forests especially ancient and veteran trees including rates of attrition from disease of other causes is vitally important to inform and evaluate the effectiveness of policy.

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