10th September 2020

Dear Department for Environment, Farming and Rural Affairs (DEFRA)

Re: England Tree Strategy 2020 consultation response
from Manchester Friends of the Earth
Green Fish Resource Centre
46-50 Oldham Street
Manchester M4 1LE

Thank you for inviting people to respond to the England Tree Strategy consultation. Friends of the Earth is campaigning for the Government, communities and individuals to urgently tackle the climate emergency and loss of biodiversity. We see trees as playing a key role in this process.

Manchester Friends of the Earth is an award-winning environmental group, creatively campaigning on local, national and international issues and actively promoting action on climate change and biodiversity loss in Greater Manchester.

We note that the England Tree Strategy covers a wide range of issues related to increasing tree cover in England. Drawing on our experience and knowledge of tree related work going on in Greater Manchester, we have chosen to respond to the consultation, in addition to completing the online survey as requested, by elaborating on the following:

Summary of our asks:

- We demand a clear target with a robust timeline to double tree cover in England
- How we achieve this target is important: We support approaches including development of woodland, sustainable commercial forestry, natural regeneration and agroforestry (orchards, shelter-belts, hedgerows). We do not support biomass crops.
- We propose that landowners, including local authorities, be supported to plant more trees by providing them with more expert advice, ensuring local plans include clear guidance for how tree planting should be achieved, and that tree planting plans are robust, detailed, have a long term view and are adequately funded.
- We propose that landowners be supported to maintain adequately the stock of trees they hold, with support, training and funding.

- We propose that forestry should be supported via requirements in procurement policy to prioritise sustainable wood products[1] and the provision of low-cost loans so that manufacturers can switch to wood-based fabrication and landowners can set up co-ops for the processing and marketing of wood products.
- We propose involving the community more actively and providing education and opportunities to contribute to increased tree numbers across the country.
- We demand funding of £500m per year to achieve this goal, which is 10 times more than is currently spent.

Why we need trees

Trees are key to mitigating the effects of climate change, healing the natural world and stemming the loss of biodiversity. They can also help clean our air, reduce flood risk and improve our wellbeing. Tackling the environmental challenges we face requires a holistic approach: planting more trees is one of a range of effective measures. We also need to change our consumption habits: eat less but also better quality meat and dairy and use less carbon based fuels while also switching to renewable, carbon neutral energy and promoting energy efficiency.

Carbon reduction

Even if we became net-zero today, we would still have too much carbon in the air. By removing carbon from the atmosphere and storing it, trees are a way to mitigate the impacts of climate change. In fact, they are viewed by many scientists as the most effective way of storing carbon[2]. If we were to double tree cover in England by 2045 that would equate to an annual carbon sequestration equal to 10 per cent of the UK's current greenhouse gas emissions.[3] Our existing carbon sinks cannot absorb the amount of carbon released into the air, and our emissions are still increasing. In addition to emission reduction, we need more sinks, more storage. We need more trees.

Biodiversity

We are in the midst of the sixth mass extinction: the UK is suffering from a loss of biodiversity. Within woods, the terrain is so varied, with clearings and glades standing alongside scrubby areas, ponds, deadwood or thick tree cover. With this variety, woods provide a range of habitats, supporting a range of life.[4] More of the right choice of tree planted in the right locations would help create more habitats and provide species with more resilience.

Air pollution

---

[1] https://www.forestindustries.fi/news/public-procurement-principles-drafted-for-wood-based-products/
[2] https://science.sciencemag.org/content/365/6448/24
[3] https://policy.friendsoftheeearth.uk/insight/finding-land-double-tree-cover?_ga=2.40434721.2023765325.1599471062-792641450.1512846127
[4] Royal Forestry Society, 2015 6 Biodiversity

The UK's cities have some of the highest levels of air pollution in Europe, which is negatively impacting on citizens' health[5]. This includes Greater Manchester's air, which is still dangerously polluted[6], with particulates from vehicle exhausts exceeding WHO safety guidelines and resulting in respiratory issues. Trees can play a role in mitigating this impact when planted and maintained appropriately, by filtering harmful pollutants from the air.

Heatwaves
UK cities, such as Manchester, are likely to suffer from more heatwaves[7]. Heatwaves drive up energy demands and costs and can have major human health impacts. Trees can cool the city down by providing shade and by the process of evapotranspiration (releasing water through their leaves). A study by the University of Manchester has shown that increasing tree cover in urban areas by 10 per cent can reduce urban surface temperatures by as much as 4°C.[8]

Flooding
With more extreme weather and heavier downpours expected as a result of climate change, regions such as Greater Manchester are at increased risk of flooding. Rain falling on impermeable surfaces, like paving, tarmac and concrete, results in more surface water runoff. Trees can provide flood defence in two ways: their canopies can catch and slow down the rain and their roots allow water to penetrate deeper into the soil at a faster rate around them. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 per cent reduces surface water runoff by almost 6 per cent.[9]

Mental health and wellbeing
Trees can also help improve wellbeing and mental health, with numerous studies supporting access to green space as a key factor in improving both the physical and mental health of individuals. Researchers from the Universities of Bristol and East Anglia found that people living closer to green spaces were more physically active and less likely to be overweight or obese, and people who lived furthest from public parks were 27% more likely to be overweight or obese.[10]

[5] https://publications.parliament.uk/pa/cm201516/cmselect/cmenvfru/479/479.pdf
[6] https://www.bbc.co.uk/news/uk-england-manchester-53265456
[7] https://link.springer.com/chapter/10.1007/978-3-319-25814-0_4
[8] Handley, J and Carter, J (2006) 'Adaptation strategies for climate change in the urban environment', Draft final report to the National Steering Group, Centre for urban and regional ecology, University of Manchester www.sed.manchester.ac.uk/research/cure/downloads/asccue_final_report_nat...
[9] 'Using green infrastructure to alleviate flood risk', Sustainable Cities www.sustainablecities.org.uk/water/surface-water/using-gi/
[10] E. Coombs, A. Jones, & Hillsdon. M., 2010. Objectively measured green space access, green space use, physical activity and overweight.' Society of Science and Medicine. 70(6):816-22

In 2015 just 13% of the UK was covered by woodland, compared to a European Union average of 38%[11], and this figure has not changed significantly in the past five years[12]. Friends of the Earth wants to increase UK woodland cover from 13% to 26% by 2045. Recent figures show that the UK currently has 3 million hectares of woodland,[13] encompassing around three billion trees. Currently levels of tree planting sit at approximately 1625 hectares per year, less than 5% of the amount recommended by the UK Committee on Climate Change (CCC); which has called for three billion trees to be planted over the next thirty years.

We believe setting a target is important: without a target it is impossible to plan adequately, fund appropriately or measure success. Considering current land use, and if we are to reap the benefits that trees can contribute, as outlined above, we believe that England needs to double its tree cover by 2045.

Doubling tree coverage is a feasible target

Friends of the Earth acknowledges that it is not appropriate or practical to plant trees without consideration of current land use, suitability and population need. Their research[14] has found that 70% of land in England is farmland, 13% is woodland and the remaining 17% encompasses cities and other habitats like mountains, wetlands and moorland, deemed unsuitable for larger-scale strategic tree planting. Evaluating the current farmland, they found that approximately 10-13% of this land is low grade rough pasture and cropland. This land is often used for livestock feed or biofuels but, they argue, it could be more optimally used for woodland. Tackling the environmental challenges we face requires a holistic approach, and repurposing this land would necessitate reducing demand for the products it currently produces. This, however, aligns well with the other mitigation measures discussed earlier, i.e. shifting our consumption patterns to eat less meat and dairy and using carbon-neutral, renewable fuel.

At least seven councils - including Oxford, Bristol, Leeds, South Gloucestershire and Wirral - have already publicly supported doubling local tree cover and are drawing up plans to achieve this.

There is already sufficient land, as well as political support and ambition, for the target we propose. To achieve the greatest impact, we need this target to be adopted at a national level.

---

[11]https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestry-statistics/forestry-statistics-2018/international-forestry/forest-cover-international-comparisons

[12] http://www.fao.org/documents/card/en/c/ca9825en ,
https://www.forestresearch.gov.uk/tools-and-resources/statistics/statistics-by-topic/woodland-statistics/

[13] https://www.forestresearch.gov.uk/tools-and-resources/statistics/statistics-by-topic/woodland-statistics/

[14]https://policy.friendsoftheearth.uk/insight/finding-land-double-tree-cover?_ga=2.40434721.2023765325.1599471062-792641450.1512846127

How we can double tree coverage

Doubling tree coverage involves not only planting more trees but also planting the right trees in the right location and ensuring their maintenance.

It is also vital that we take steps to more actively manage existing trees. The CCC estimates that the UK currently has an 18MtCO2e forestry sink and warns that a "business-as-usual scenario" would lead to a "forestry net sink drops from 18 to 8MtCO2e in 2050, due to ageing woodland and low rates of planting." The i-Tree survey carried out by City of Trees found that 30% of Greater Manchester's trees are in poor/moderate condition due to disease, damage or old age and are likely to be lost. The All Our Trees report estimated that one million of Greater Manchester's trees, for example, could be at risk of being lost due to pests and diseases such as ash dieback and bleeding canker.

To support local authorities and private landowners to increase tree numbers on their land, maintain these numbers and reap the benefits from planting trees, we need:
1. A holistic national strategy that helps shift demand for current unsustainable land use while also making conversion of that land economically attractive
2. Funding of £500m per year
3. To make funding and expertise more easily available so that trees are chosen and actively managed in a way that ensures the greatest environmental benefit is gained
4. Local plans to set targets that reflect the need to double tree cover and ensure that tree planting plans are robust and detailed and have a long term view
5. To grow and develop our knowledge pool of ecosystem management
6. To adopt a data driven approach, with regular monitoring and quick feedback loops and evangelise the use of tools like i-Tree to ensure that the right trees are planted in the right places
7. Community involvement

1. Holistic strategy

To reach our goal of doubling tree cover, as suggested, there is a need to widen our focus on what land in England could be used for tree planting. As well as commercial woodlands, if we want to use existing farmland, we must support farmers and landowners to plant more trees in fields and within hedgerows and shelter-belts. We could also identify greenbelt land for further tree planting, where this is appropriate, and look at converting poor quality farmland to woodland.

Supporting farmers to convert land

Promoting sustainability in diet and in farming
Achieving the conversion the Friends of the Earth report described would require support for the UK population to move further towards a diet lower in poor quality meat and dairy products to free up low grade rough pasture for tree planting. This would not only improve individuals' health but also contribute to increasing tree numbers across the country. There is increasing evidence that overconsumption of meat is bad for health.[15] Healthy lifestyles are encouraged through a plethora of levers, ranging from the educational and legislative to the more monetary. Similar mechanisms could be used to encourage a reduction in meat and dairy consumption.

With less land available for livestock farming, there would be a need to ensure that farmers are not forced into more intensive farming practises, which further degrade the land and increase biodiversity loss.

Discourage/ban commercial uses of woodland that negatively impact the environment
While we support a variety of means of doubling tree coverage, like sustainable commercial forestry, natural regeneration and agroforestry (orchards, shelter-belts, hedgerows), we do not support planting biomass crops.

While biomass is renewable, scientists say[16] it is not carbon-neutral in the short term. Burning biomass releases large amounts of CO2 quickly into the atmosphere, which takes decades to draw back through a tree's life, and so in the next 20/30 years - the timescale that matters to us - this process is effectively adding to our emissions. Just as growing and burning our own biomass is not an effective solution to our current climate crisis, but in fact deepens it, importing wood for biofuels, where much of this is of questionable provenance and could see the UK contributing to logging of rainforest in places like the Amazon, is even worse.

2. Funding

We demand funding of £500m per year to achieve the goal of doubling tree cover, which is 10 times more than is currently spent.

Given that climate change will lead to an increase in insurance payouts due to floods, storms etc. there is a case for making the insurance or fossil fuel industries fund mitigation measures. These include tree planting in flood-prone catchment areas. Finance for tree planting could be provided by: (1) contributions from the Government equivalent/proportional to insurance premium tax; (2) encouraging the insurance industry to provide the capital required (on the

---

[15] https://www.bmj.com/content/357/bmj.j2278
[16] https://www.scientificamerican.com/article/congress-says-biomass-is-carbon-neutral-but-scientists-disagree/

grounds that they will benefit in the long run by limiting flood damage); and/or (3) a levy on the fossil fuel industry and other carbon-intensive businesses (on the grounds that they contribute to climate change). We need to ensure that any contributions from the fossil fuel industry cannot be considered as carbon credits.

In Greater Manchester there is recognition that financing is a key issue when considering the barriers to tree planting and that not enough funding is available. The Greater Manchester Natural Capital Investment Plan outlines possible ways to get more funding. Several different funds and projects have been set up to address this, including the Greater Manchester Environment Fund and the Ignition Project, which are exploring ways to make funding ecosystem projects more financially self-sufficient.

3. Make funding and expertise more easily available

Putting woodland development on an equal footing to farmland
The Royal Forestry Society's Woodland Creation Opportunities and Barriers survey[17] was carried out in Spring 2020. Realising that the extent of woodland creation is low, especially given the targets set[18], the Society asked its members, who include woodland owners, forest managers, workers, arborists, tree agents and other countryside professionals, what barriers exist to woodland creation, and a lack of financial incentives was key: farmland and woodland are not on an equal footing. Furthermore, the grant funding process to create woodland is complicated and problematic. Developing woodland is a long game, and landowners worry that sources of funding will not support them for an adequate duration.

4. Tree planting strategies must consider the long term view with clear targets

We propose that local plans should include targets to double tree cover by 2045 in their area with a robust and detailed plan of how this will be achieved.

We welcome the introduction of Local Nature Recovery Strategies (LNRSs), which are being piloted now in Manchester and are intended to be rolled out across England[19]. These pilots are

---

[17] https://www.rfs.org.uk/about/publications/rfs-reports/
[18] "the UK government has set a target to create 30k ha per year of new woodland for 30 years. The average rate of woodland creation over the last five years (2015-19) has been less than 9k ha/year, so the newly calibrated target is a substantial challenge. This is particularly
the case in England and wales where, although on a rising trend, rates of new woodland creation, averaging 1.7k ha/year over five years, have been lamentably low, even against the modest targets set by the government in 2013." Woodland Creation Opportunities and Barriers, https://www.rfs.org.uk/about/publications/rfs-reports/

[19]https://www.gov.uk/government/news/five-local-authorities-announced-to-trailblaze-englands-nature-recovery-pilots

intended to develop a set of maps that show the most valuable existing sites and habitats for wildlife and identify where nature can recover. Identifying the best places to help nature recover, plant trees, restore peatland, mitigate flood and fire risk and create green spaces is essential to building a robust strategy.

In addition to having targets to double tree cover by 2045, we would encourage LNRSs to

- Include a duty for local authorities to identify areas with the lowest tree cover and focus on planting trees and providing incentives to plant trees in these areas first. Areas with low tree cover are frequently in deprived neighbourhoods, and increasing tree cover is expected to improve people's health and wellbeing in such neighbourhoods.
- Change and strengthen local planning regulations to ensure that any proposed development seeking building approval should include the need to plant a substantial number of trees and that this should be mandatory and enforceable, with meaningful fines attached to non-compliance.

5. Building back knowledge

Not all trees provide the same level of ecosystem services. In general, leafier trees are better, native trees are better and larger trees are better, but there are a range of other factors to consider. To get the benefits we want, we need embedded expertise, ongoing management: attention is required not just for planting trees, but also for maintaining them.

The CCC identified that we need more research on the most appropriate tree species and investment in skills training to enable better monitoring, planting and management of trees. This aligns with the findings of the Royal Forestry Society's Woodland Creation Opportunities and Barriers survey, mentioned earlier, which identified a lack of known methods of responding to management challenges, like grey squirrels, as being a barrier to woodland creation.

We need experts with knowledge that take a holistic approach to management: planting trees should not come at the expense of existing valuable ecosystem resources.[20] The sector has suffered from underinvestment and requires funding now to support existing practitioners and train new ones.

6. Adopt a data driven approach with the latest monitoring and data gathering tools

To understand what we need to do, we need data about the quality, number and status of our trees.

---

[20] Example of converting peatland to conifers as outlined in carbon brief article.

The right tools can help us ask the right questions

The Manchester group City of Trees conducted an i-Tree survey in 2018, which quantified the ecosystem services Manchester's estimated total of 11,321,386 trees provide. Used internationally to model ecosystem services and values, the i-Tree tool can help focus policy solutions by not just looking at the structure of trees and woodland (how many, type etc.) but also identifying their function. When we consider replacing a tree, we shouldn't just consider replacing the object, but really look at replacing the function. What is this tree doing? Instead of descriptive, qualitative data, in focusing on the function of a tree, i-Tree provides something more objective and tangible to discuss and benchmark against. We would encourage the adoption of this tool on a local and national level.

Regular feedback

Data on the status of our trees needs to be gathered regularly. The recent Greater Manchester policy document All Our Trees committed to review strategy, targets and actions every 5 years and have the Greater Manchester Forests Partnership produce a progress report (number of trees planted, number of woodlands in active management) annually. We propose that such a report should be prepared nationally on an annual basis.

7. Community involvement

We, as average citizens, want to be given opportunities and time to take an active role in growing our trees and doing our bit to stem environmental collapse.

In Manchester, there are various initiatives to encourage community involvement, for example Citizen Forester[21] and The Conservation Volunteers[22]. These initiatives are welcome, and we would encourage more to be adopted across the country.

To complement these initiatives and learn more about how to grow and maintain trees, we need resources that are easily accessible, reliable (up to date) and informative.

True engagement, however, takes time. Most people have a natural affinity with trees and wildlife, but not everybody is able to engage with these regularly due to time constraints and location. Tree maintenance and planning could become part of an active citizenship programme backed by a 4 day working week.

---

[21] https://www.cityoftrees.org.uk/event/citizen-forester-monthly-volunteering-sessions-20
[22] https://www.tcv.org.uk/north/volunteering-north