



The Ancient Tree Forum's view on forests and woods in England.

The Ancient Tree Forum (ATF) seeks to raise awareness and understanding of the value and importance of ancient trees and advocates no further avoidable loss of ancient trees. Ancient trees are a type of Tree of Special Interest (TSI) which also includes notable, champion and other veteran and heritage trees. TSIs are important for biodiversity, heritage and landscape because of their size, age, condition or for their cultural connections.

Q 1 – What do forests and woods mean to you?

Out of the millions of trees that make up woods and forests in England, the Ancient Tree Hunt has identified 26,000 Trees of Special Interest in woodland and therefore their special interest is relevant to the Panel. TSIs are also found in the wider landscape in pasture woodlands, parkland, hedgerows orchards, fields and commons in the rural environment, parks, streets and gardens in the urban environment and therefore the Panel should have a wider remit to encompass them in their recommendations (as recognised by the current *'Policy for England's Trees, Woods and Forests 2007'*).

TSIs open our eyes to layers of history in our landscape reaching back millennia. A single tree can take us back through time to an important person or event in history (Boscobel Oak, Oak at the Gate of the Dead), glimpse a landscape seen by William the Conqueror or mark a pre-historic ceremonial site. Trees of Special Interest have contributed significantly to the making of our unique, quintessentially English landscapes. They tell us why these unique landscapes were created and valued, carry that legacy and other values that were not recognised at the time into the present e.g. biodiversity and allow us, through them, to pass on this inheritance into the future.

Q 2 – What is your vision for the future of England's forests and woods?

Our vision is for the recognition, long-term care and protection of TSIs, wherever they occur and the development of a sustainable succession. They should be protected from loss and damage and managed to best practice standards. The public estate should be the showcase for implementation of government policy for TSIs to other owners in the UK and Europe.

Land use changes have altered the context but not the importance of TSIs which are not confined within arbitrary land use boundaries. They should be managed inside and outside forests and woods in ways that create the conditions for TSIs to resist disease or decline and adapt to changes whether natural or man-made and for their ultimate replacement.

There should be long term investment in recruitment of veteran and ancient trees into the future, especially in priority habitats, thereby stewarding and restoring landscapes full of history and biodiversity at a landscape scale.

Q 3 –the benefits of forests and woods to:

a) ATF supporters:

The ATF believe that ancient trees are important in their own right as rare examples of their species. They create an 'air of antiquity' which enhances a sense of place and history. Ancient and veteran trees uniquely

provide the conditions for many rare and unusual species of wildlife to exist, be studied and enjoyed by specialists and laypeople. Forests and woods with TSIs have a special distinctive quality of beauty and landscape character.

Ancient and veteran trees provide a resource for the deeper understanding of ageing and decay and re-assessment of the interplay of the tree with its associates above and below ground. This has implications for the management of all trees and for their ability to show resilience to pests and diseases and against the challenges of the future such as climate change.

b) Society as a whole;

Society has demonstrated that TSIs are much valued. The Ancient Tree Hunt – a project run by three charities, the ATF, the Tree Register of the British Isles and the Woodland Trust, has involved thousands of ordinary people in identifying and mapping this important natural capital. In England there are already more than 81,000 of the finest, handpicked trees on the database which currently comprises 4,618 ancient and 51,884 veteran trees.

We have inherited and retained historic landscapes rich in ancient and veteran trees that were originally exclusive to the King and the highest levels of society as Royal Forests but access to them and the values they retain are now more widely available to people in all walks of life.

c) The natural environment

Forests and woods rich in TSIs are inspiring new avenues of learning, forcing us to revise our understanding of ecological processes. Individual and collections of ancient and veteran trees, including in forests and woods, continue to provide important ecosystem services, medicines for human health, habitat for some of our most charismatic and internationally important species eg bats and healthy soils.

d) The economy

“Taking Part”, English Heritage’s research, demonstrates that registered historic parks are extremely popular visitor attractions. Forests, woods, wood pastures and especially parklands rich in ancient and veteran trees create a valuable economic resource contributing to outstanding heritage landscapes for visitors and tourist from home and abroad.

TSIs are host to economically valuable species in their own right, for human medicines and plant disease control.

Forests and woods which are rich in pollards and coppice illustrate traditional systems of agro-forestry from the past. Regular pollarding or coppicing of trees provided local, sustainable, everyday raw materials and products for homes and communities. The practice became uneconomic with the advent of cheap fuel and oil, which is non-sustainable and non-renewable. There is a contemporary role for these ‘working trees’ in providing sustainable living now and in the future.

We are however concerned that high value, dead and decaying wood and veteran trees are under increasing threat from the resurgence in demand for wood fuel production. There is too little recognition of the value of decaying wood for healthy soils and biodiversity.

Q 4 – practical solutions and good practice which can be replicated more widely.

We would like to see an integrated package of recognition and designation of TSIs, positive incentives and good advice with revised, targeted legislation in place as a backstop.

1. Introduce a “Trees of Special Interest” designation

Trees that are of national value should be recognised by a designation to fully appreciate and understand the significance and vulnerability of this natural capital to England, the UK and Europe. The trees given this designation should be selected from the ATH database.

Recognition of the value and mechanisms for protection of TSIs should transcend individual government departments and hierarchy. We would wish the Panel to highlight the lack of joined up thinking and action across government in relation to TSIs. It has prevented private and NGO owners having access to European funding available to other member states (eg Sweden) and other sources of funding.

2. Maintain continuity of ownership of valuable concentrations of TSIs in public ownership, managed to best practice to safeguard their special interest values for public benefit.

Royal Forests and Chases such as the Windsor Great Park and Forest (Crown Estate), the New Forest, Savernake Forest, Salcey Forest, Sherwood Forest and Morehay Lawns (Forestry Commission), Yardley Chase (MOD Defence Estates) retain some of the best concentrations of ancient and veteran trees in Europe as a direct result of the continuity of ownership by the crown or aristocracy since mediaeval times. Resources commensurate with their value need to be allocated to care for this public estate steeped as it is in history and stories that resonate around the world (eg Robin Hood) and also icons of old growth biodiversity.

3. Change financial incentives or rewards (subsidies, grants and taxes) to promote best practice in the care of TSIs

The priority is to win hearts and minds and prevent loss and damage rather than prosecute. Improved TSI targeted financial incentives would help to encourage landowners to implement best practice.

4. Government support for ancient tree advice to inspire owners and local communities to care for their ancient and veteran trees

In our experience loss of TSIs so often happens through ignorance or benign and damaging neglect. Well qualified, trained experienced and independent (i.e. without a commercial bias) staff should be the frontline in providing advice, assistance and inspiration to forest and woodland owners to deliver more environmental benefits (ecosystem services) for which there is no commercial return or where there is income foregone or expended for the public good. They are essential to objectively assess proposals (e.g. felling licence and grant applications) against national and regional policies, and to promote, monitor and enforce good and best practice forestry and other standards and contribute to their continued production and updating. They should also provide valuable, direct and continuous feedback on the effectiveness or otherwise of grants and policies; recognition when the forest and woodland sector needs assistance or research to be identified and championed. Well qualified staff who keep themselves up to date are especially important where owners intend to opt out of financial incentives. In these circumstances and to avoid the need for greater regulation, the main solution is for owners to be persuaded to follow good practice.

5. Make changes to tree legislation, policy and guidance so that TSIs do not fall through the net.

Where policy, advice, incentives and agreed standards are insufficient to encourage owners to manage according to good practice, comprehensive and effective legislation (according to PACTT principles) should be in place. The special nature of TSIs is not sufficiently recognised so that they are properly safeguarded.

Felling Licence and TPO systems need to dovetail better whether in urban or rural areas, by whichever is most appropriate. Annex 1 provides some fine detail changes to Felling Licence regulations that we would wish to see addressed and we could also provide suggestions on changes to the TPO system that would better allow a joined up system of TSI protection.

The government should not let national planning policy on aged and veteran trees, contained in Planning Policy Statement 9 on biodiversity, be diluted as part of current proposals to streamline planning guidance and should review permitted development rights to avoid loss and damage to TSIs.

Q 5 –the priorities and challenges for policy about England’s forests and woods

Priorities

1. The Panel should propose mechanisms for the care and protection of TSIs in forests and woods that can be carried across to such trees outside woodlands to provide a more holistic approach to landscape scale protection, restoration and habitat creation.
2. Amend good practice to recognise that healthy soils are crucial. Redirect research into the sustainability of soils for tree health and habitat. Create forest and woodland soil reserves where conservation of their entire biodiversity and role in nutrient recycling is the priority.
3. Greater thought needs to be given to creating the appropriate conditions for getting the right trees in the right density in the right place to meet and enhance biodiversity, landscape and heritage value. It is a question of quality and not quantity. There should be opportunities for ‘wild’ tree regeneration. In some situations tree planting can be a major threat to existing TSIs and a block to establishing wood pasture and parkland conditions for open crowned trees to regenerate and grow.

Challenges

There will be increasing competition between different land uses. More widespread traditional management practices which benefit trees and the environment that are productive and sustainable should be promoted. This might be achieved by the integration of tree, wood and forest management into land management rather than separate forestry and agriculture. Integration would foster better appreciation of the benefits of sustainable ‘tree produce’ in the widest sense (including wood fuel & ecosystem services), ensure robust environments for the future and ensure our inheritance of TSIs is carried forward.

Annex 1: Changes proposed to Felling Licences

The felling of TSIs, is not adequately controlled by the requirement for a licence. Dead TSIs, even if they are of the highest heritage and biodiversity value, are not controlled at all. The 5 cu m exemption leaves important, large girthed trees vulnerable and outside control.

The following changes are required to the felling licence regulations:

- a) delete the word 'growing'

Rationale 1: This is in conflict with UKWAS, which recognises the significance of dead, standing trees: 6.2.2 *Owners/managers shall take action to provide both standing and fallen deadwood habitats throughout the woodland, where this does not conflict with safety of the public or forestry workers or the health of the woodland.* Felling Licences should be reinforcing the requirements of UKWAS. Where dead trees might be a real risk of causing serious harm an exemption permits an owner to fell a tree – see (c) below.

Rationale 2: There are many small woodland owners or community owned woods which are not in the UKWAS scheme, primarily on grounds of costs and economics, which are unlikely to change. These owners are not bound by or necessarily aware of the standard and the implications of removal of dead wood and trees. There is also evidence of increased removal of dead trees/wood with the growth and promotion of wood fuel markets. This has significant implications for priority woodland habitats and species.

- b) Trees with a dbh of 1m or greater and TSIs should be exempt from the 5cu m allowance so that their felling would require a licence. Rather than requiring a licence, this could be by a simple notification system eg as used in Conservation Areas under the Planning Act 1990.

Rationale: 5 cu m allowance permits the felling of at least one single, large, TSI. Modifying this exemption in a targeted and limited way would ensure a measure of control over the felling of TSIs without affecting the majority of owners' ability to fell trees for their own use or limited amounts for sale without permission as now. A 5 cu m per quarter exemption in the case of small landholdings allows the felling of a significant amount of trees over a relatively short time period without restriction. Cumulatively, this has the potential to have a large impact at a landscape scale.

- c) The exemption for trees that are dangerous should be reworded to reflect the guidance given in relation to this exemption (FAQs. FC website). *"This exemption will only apply if there is real risk of serious harm."* The guidance also recommends seeking advice to explore the alternatives to felling and goes onto state *"you may be prosecuted[if] the tree did not present a real or immediate danger"*

Rationale: the intention of the advice (with which we agree) should be explicitly expressed on the face of the Act.