

Environmental Land Management Questions

1. Do you want your responses to be confidential? If yes, please give your reason.

No

2. What is your name?

The Association of Tree Officers

3. What is your email address?

Rebecca Porter, National Coordinator - nc@ato.org.uk

4. Where are you located? North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote

We are a National Organisation

5. Who are you? Internal to Defra/Defra arms length body (ALB)/Lobby group/Other government department/Parliamentary group/Land manager/Other (please specify)

Other: The Association of Tree Officers is the national organisation representing Tree Officers in the UK. We are a membership organisation represent the views of Tree Officers in 59 Local Authorities and host the Tree Officer Forum with the LTOA, a forum that has representatives of 20 regional tree officer groups from the across the UK including the states of Jersey, Guernsey, Isle of Man and Office of Public Works in Ireland. (<https://ato.org.uk/tree-officer-forum>)

6. Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

The design principles laid out are good and we agree that the ELM should be a mechanism to deliver on the 25 year Environment Plan and net zero target.

There is some concern over design principal d. that it reduces any ambition in the scheme. It is important to set achievable targets for land managers, but equally targets must be stretching otherwise you risk losing innovation. The right balance needs to be struck between the two to meet the net zero target.

Science has now established a clear link between the natural environment and the social benefits it provides. However, this does not feature in the design principals for the scheme. For example the first iTree eco survey carried out in the UK of Torbay calculated there were £281,000 worth of benefits to the public (<https://www.treeconomics.co.uk/projects/torbays-urban-forest/>). Calculations such as this that show clear societal value should be factored in to the design principals. Especially if the tag line “public money for public goods” is used in the document.

7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Yes in part, but it does depend on what the environmental priorities are. A sliding scoring system to decide on these priorities is best, with those that make a real improvement to the environment and society being weighted higher than those that do not. Additional scoring should be given if that environmental benefit can link through national, regional and local plans.

Trees are uniquely placed in that their benefits to society can be readily quantified using tree eco and canopy cover studies (<https://www.forestresearch.gov.uk/research/i-tree-eco/>). Therefore, schemes improving tree management, not just planting, can have their benefit measured. They can truly demonstrate 'public money for public goods', and their planting and management should be an environmental priority.

8. *What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?*

The best way to encourage participation is to open it up to all. In the past the minimum number of hectares excluded some local authorities from applying for grants. These LA often had the highest population densities and therefore could achieve the greatest in terms of public good for their investment value. For example to be able to apply for Woodland Management Plan grant you need a minimum of 3 hectares, something which is not possible in some urban areas or where woodland has become fragmented. As getting woods into management is a Forestry Commission objective it would be prudent for some grants to reduce the minimum size of the land to encourage smaller land owners to apply.

9. *For each tier we have given a broad indication of what types of activities could be paid for. Are we focussing on the right types of activity in each tier?*

Our main focus is Tier 2 and support the inclusion of maintenance along with tree, shrub and hedge planting. A definition for maintenance will need to be decided on as the example given could mean post planting aftercare or general tree maintenance. As LA's have little money to pay for tree maintenance and the health of a tree is inextricably linked to the ecosystem services it can provide. We would suggest that all maintenance is included if it improves the health of the tree.

We also welcome the inclusion of urban green space restoration/creation/management and species management (prevention/control of invasive species). LA have little or no money to put towards managing these. So it is refreshing that these are included.

10. *Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?*

Firstly, for this to work a clear vision/plan on what environmental priorities are needed and this needs to be at a landscape level which then feeds in to local land management. Secondly it will need coordination and buy in from land managers to make it happen. To achieve this a forum of local land managers could be pulled together to produce a plan and then act on it. A good example of this is the London Urban Forest Partnership managed by Greater London Authority.

11. While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

For trees the Local Authority Tree/Woodland Officer is essential to setting the local priorities in their area. Their local knowledge means they are best placed to provide information on local needs. The Association of Tree Officers can help sign post to relevant tree officer groups or tree officers through our membership and the Tree Officer Forum.

In addition to this, priorities should be determined by what their outcomes would be. To do this you need to know what you have and the best way to do this would be through an inventory, canopy cover assessment and/or iTree study or other natural capital accounting method. You then have a baseline to build and monitor work from. It could also allow you to project benefits and to find priorities that offer the best value.

12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

Payments should be based on a sliding scale with those that provides the greatest environmental and social benefits receiving the greatest payment. Applications could be assessed on a points system that places the application in to different tiers of payment. These payment tiers divided by land classification types e.g. SSSI's, Local Nature Reserves and Sites of Local Importance etc.

Schemes that link in to Local, regional and national priorities should be given a higher weighting than those that don't. Also schemes that seek to substantially improve the environmental and societal benefit of a piece of land should be prioritised, such as foresting a field used for cereal crops and opening that to the public.

13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

This could be a possibility for tier 2 & 3 in the form of match funding, which has worked in the Urban Tree Planting Challenge. Not having to pay for the whole of a project is often more palatable for Local Authorities and can achieve good results. However, the money being offered has to be based on market values for task or products.

14. As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

Expert advice is not always needed, but should always be available. Also, it should always be provided by an expert in the required field.

The times when it is needed the most is:

- When planning a scheme – a pre-app meeting with an expert would establish quickly what is possible with a site in relation to local, regional and national priorities. They can also help guide the application process thereby making it more efficient and easier for the applicant.
- When filling out the application as they can be complicated – this would reduce the chance of the applicant making mistakes making the process more efficient.

- When plans need to change – due to unforeseen circumstances a plan for an area may not work when it comes to implementation. A meeting with an expert on finding a way through this, possibly by relocating that plan for that area somewhere else on the site would provide flexibility and keep the scheme on track.

15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

With regards to schemes involving trees there are a number of open source apps available that can assist in monitoring: canopy cover assessments (itree canopy) and iTree eco reports. In addition to this inventory report, tree survival statistics and before and after photographs can also be made available.

Ground truthing of the monitoring should be assessed through inspection by an expert every 3 years against the plans and work schedule submitted with the application.

16. Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

Yes we agree to the proposed approach to the National Pilot.

The key elements to test of the ELM is:

- How easy is the scheme to administer?
- Will it allow real positive environmental change?
- Does it provide positive benefits for society – “public money for public goods”

17. Do you have any other comments on the proposals set out in this document?

No further comments.