

Belfast Tree Strategy

Comments by

Northern Ireland Environment Link

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These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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NIEL welcomes the publication of the draft Belfast Tree Strategy. It has been clear for a while that biodiversity in NI is not doing well. For example, the State of Nature Report (2019)¹ found that 11% (272) of the 2,450 species found in Northern Ireland that have been assessed using the IUCN Regional Red List criteria, and for which sufficient data were available, are threatened with extinction from Ireland as a whole. The 2015-2020 NI Biodiversity Strategy² was supposed to deliver a plan on how Northern Ireland could meet its local and international commitments to protect nature and ensure the environment can continue to support people and the economy. However, a review of the NI Biodiversity Strategy by RSPB NI³ revealed that 83% of government commitments (35/42) set out in the strategy have not been adequately met. NI got a ranking of 12 (out of 240 countries and territories, where a ranking of 1 is the lowest biodiversity intactness and 240 the highest) in a Biodiversity Intactness Index, which indicates how much nature is left from a pristine state, for the amount of nature it has left⁴. As regards woodlands specifically, Northern Ireland is the least wooded part of the UK and Ireland with just 9% woodland cover.⁵ This compares to 11% in the Republic of Ireland, the UK average of 13% the UK, and the European Union average of 38%.⁶ According to the i-Tree Eco study, only 35% of the trees in the Belfast City Council area are in good ecological condition, down from 70% in 1995⁷. Our trees, hedgerows and woodlands provides a wide range of very valuable ecosystem services including the capture and storage of carbon, helping biodiversity, improvements in air quality and the reduction of flood risk and so planting more trees can bring multiple benefits for people and nature.

According to the UK Climate Change Committee's "Advice report: The path to a Net Zero Northern Ireland"⁸ in order to meet the Net Zero by 2050 target in the Climate Change Act (Northern Ireland) 2022⁹, in Northern Ireland

"Annual afforestation rates will need to reach 3,100 hectares per year by 2035 and 4,100 hectares by 2039 remaining at this level until 2025"

These targets represent a significant increase in previous afforestation rates of 540 hectares reported in 2021/22 and of around 290 hectares annually between 2018 and 2022¹⁰. The Belfast Tree Strategy could contribute to achieving this target.

As highlighted on the Belfast City Council website¹¹ there are three central themes in the Belfast Tree Strategy: (1) Trees and Forest structure (2) Community Framework and (3) Sustainable Resource Management.

(1) Trees and Urban Forest Structure

We need to tackle the climate and biodiversity crises in an integrated manner and increased tree planting must be delivered in a way that benefits climate, nature and people. The first stage in doing this effectively would be to comprehensively map the extent, location, diversity and condition of existing trees, hedges and woodlands to inform future actions for their expansion, enhancement and protection. NIEL therefore welcomes the high priority

actions proposed in T1 “Relative Tree Canopy Cover” to carry out a detailed canopy cover assessment to establish accurate potential canopy cover and the amount of tree cover also provided by woodland and hedges and to review this every five years. This should ensure that progress towards reaching the target of 30% canopy cover is continuously monitored and appropriate actions are taken as and when required.

NIEL welcomes the recognition throughout the strategy of the need to have a diverse mix of tree species (T2, T3, T4), and for priority to be given to native species (R16). Further detail in relation to native species is provided in our response to the proposals in the Sustainable Resource Management theme (R1-18).

As outlined in T3, the recent i-Tree Eco study indicates that Belfast's top three most common species were Ash (11%), Sycamore (9%) and Beech (5%) which together account for 25.8% of the population. Of those three species, only Ash is native to the island of Ireland. Unfortunately Ash is at risk due to Ash dieback so it is vital that Belfast has a diverse mix of species to ensure that the urban forest is more resilient from diseases and changing weather patterns. The high priority given to assessing Belfast's street tree diversity under T3 and for this to be reviewed every 10 years is therefore welcome as this should help with species selection for new planting. Again, NIEL believes that increasing biodiversity should be given a high priority in this strategy.

Ancient woodland i.e. woodland in existence since the 1600s, is scarce and in Northern Ireland covers just 0.04% of the land surface. Ancient woodland has special communities of plants, insects and animals not found elsewhere. According to the Woodland Trust's State of the UK's Woods and Trees¹² report, just 1% of woodland ASSI area in Northern Ireland is in favourable condition. The main reason for this is due to alien and problematic species, such as rhododendron, which alters the natural woodland composition. ASSI woodland in Belfast, including Belvoir Forest Park contains fragments of ancient semi-natural woodland. If the draft Belfast Tree Strategy's vision is to be achieved, more needs to be done to protect and enhance these irreplaceable habitats before they are lost. NIEL would therefore welcome the proposed actions outlined in T6 to carry out benchmark surveys on the nature and extent of natural areas including woodland and hedgerows and assess usage level and patterns, threats, ecology and function of those natural areas. The links between T6 and the targets in and T5 “Publicly Owned Trees” and R12 “Management of Publicly Owned Natural Areas” need to be properly accounted for. NIEL also believes that the actions contained within T6 and R12 should be given a higher priority.

(2) Community Framework

NIEL welcomes the recognition within C1 in the draft Belfast Tree Strategy of the role that partnership working has to play in advancing the goals related to urban forest issues and opportunities. Not only do the actions within this section of the strategy seek to achieve this, the partnership approach that led to the development of this strategy was demonstrative of this approach and is to be commended.

Recent tree felling by statutory undertakers such as the Department for Infrastructure have shown the need for more proactive engagement in relation to tree management. We therefore welcome the proposed actions set out in C3, however given the increased interest by local communities to protect their local trees, we would like to see these actions given a high priority.

(3) Sustainable Resource Management

As outlined in the Executive Summary of the Belfast Tree Strategy, the two highest priority goals within the Sustainable Resource Management theme are to increase the use of native species on project appropriate basis and to create a clear and openly accessible tree management portal for all tree data. NILE supports both of these stated goals.

NIEL welcomes the inclusion of R4 “Tree Equity” within the draft Tree Strategy and notes this is a medium priority. The Woodland Trust in partnership with the Centre for Sustainable Healthcare is working with American Forests to bring a tree equity scoring system to all urban areas across the UK¹³. The Tree Equity Score will highlight inequitable access to trees and will measure how well a neighbourhood provides the benefits of urban tree canopy to various population groups. This will provide a measure of the priority level of certain areas for tree planting, where the lower the score, the greater priority for tree planting. Given that this tool is due to be launched later in 2023, NIEL would recommend that the action in R4 to “Consider a Tree Equity map for Belfast and focus efforts around tree planting and community engagement in the areas that most need it” is given a high priority. This should ensure that Belfast acts more quickly on the findings and recommendations set out in the Tree Equity Score and will support Belfast’s International Reputation (C9).

NIEL strongly supports the actions set out in R8 and R9 to ensure that the right trees are planted in the right places for the right reasons. Trees, woodland and hedges form part of wildlife-rich mosaics with other habitat types and in some cases such as deep peat and other potentially high value habitats, tree planting would be inappropriate. NIEL would therefore recommend that overall biodiversity impacts are taken into consideration in Belfast’s tree strategy to ensure that tree planting enhances biodiversity and does not have an adverse impact on wildlife. Doing so should also contribute to achieving the aims and objectives of the Belfast City Council green and blue infrastructure plan 2020¹⁴, in particular the aim on page 22 that “all spaces should however consider how they can support biodiversity” and on page 42 that “Through the implementation of the GBIP the council seeks to achieve net gain in biodiversity.”

NIEL also believes that the priority given to biosecurity (R14), currently given as moderate, needs to be high. Increasing tree cover will require a greater number of trees are planted. However due to the limited capacity of local growers, trees are often sourced from outside the island. Importing trees can inadvertently introduce new pests and diseases that can have a devastating impact on our native trees and woods.

NIEL believes that biodiversity should be given a high priority in the tree strategy, particularly given the limited species diversity of trees found in Belfast (as referenced in T3). NIEL is therefore pleased to see R16 "Native Vegetation" and Commitment 14 "Nature conservation, biodiversity and user safety will be the primary objectives in all woodland management within the Belfast City Council area." However, NIEL believes that the action proposed in R16 "Discuss appropriate quantifiable targets for native vegetation and review this with relevant officers." lacks ambition and is too vague, as it makes no specific commitment to any concrete action or outcome. Instead, further to R16 and Commitment 14, and other parts of this draft strategy and other strategies and policies, NIEL believes that there should be a high target set for the level of native species planted at the start of the process. The planting of native species should also reflect the aims of the All-Ireland Pollinator Plan where possible and fruit and nut bearing trees such as hazel, hawthorn, apple and cherry planted. This should not only help nature recovery networks for insect populations but also could help the citizens of the Belfast City Council area in relation to food security.

This should also contribute to an increase in the use of native species on project appropriate basis, the other one of the highest priority goals within the Sustainable Resource Management theme. Setting a target for native species planting would also be in line with the second action in target T4 Species Suitability "Establish Native - Non-Native Guidelines for urban and rural areas." Prioritising the planting of native species should also contribute to one of the (six) aims of the Belfast One Million Trees¹⁵ strategy to "support and enhance biodiversity", which is listed in Figure 2 of the Belfast Tree Strategy as a relevant strategy and is probably one of the most relevant strategies. The very first line on the One Million Trees website¹⁶ says

"We are working with city partners to plant one million native trees across Belfast by 2035."

There are many good reasons for planting native species including the economic benefits of doing so as purchasing locally sourced native tree species from local community tree nurseries and seed collections would also support and hopefully create green jobs.

Other

NIEL would appreciate it if further detail could be provided on the status of the strategy and how it will be implemented particularly in relation to the funding for the strategy and the staff time and expertise that will be made available.

NIEL would also welcome the provision of greater clarity as to how nature based solutions can be used in adaptation and resilience building options as part of this strategy.

-ENDS-

References

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 - ⁴ <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-index-summary-report-v4.pdf>
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 - ⁶ <https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestry-statistics/forestry-statistics-2018/international-forestry/forest-cover-international-comparisons/>
 - ⁷ <https://www.belfastcity.gov.uk/Documents/Belfast-tree-strategy>
 - ⁸ <https://www.theccc.org.uk/publication/advice-report-the-path-to-a-net-zero-northern-ireland/> (p41)
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 - ¹¹ <https://www.belfastcity.gov.uk/Documents/Belfast-tree-strategy>
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 - ¹⁴ https://www.pacni.gov.uk/sites/pacni/files/media-files/BCC-AD-GBIP_0.pdf
 - ¹⁵ <https://www.belfastcity.gov.uk/onemilliontrees>
 - ¹⁶ <https://www.belfastcity.gov.uk/onemilliontrees>