

Appendix B: Summary of external consultee responses

Name/Organisation	Summary of Comments	Response of Authority
Plant Health Forestry Team Forestry Commission (FC)	<ol style="list-style-type: none"> 1. [...] include the Plant Health Forestry unit as external parties/partners in relation to Objective 3 especially ref the Plant Health Risk Register and other pests and diseases. 2. We may be able to support you or share information from our aerial surveys (Objective 1) 3. FC have also provided a short list of relevant pests and diseases to consider and relevant resources to refer to. 	<ol style="list-style-type: none"> 1. The actions supporting Objective 3 have been reviewed and amended. 2. This is welcomed and we look forward to working with FC. 3. Noted. Review West Sussex Plant Risk Register in the light of the details provided.
Sussex Wildlife Trust	<ol style="list-style-type: none"> 1. "Overall, I found this an encouraging and well-articulated plan providing a good way forward for the Council." 2. Section 2 can be enhanced by adding the point that that the listed social and environmental values do have real if generally unmeasured economic benefits. Traditional evaluation of economic benefit often misses large areas of real value and, nationally this has arguably resulted in poor decision making. [...] When they are measured these economic values can way exceed the traditional economic values given for instance to timber value. Such measures have been made at a national level. [...] 3. A recommendation is made to balance section 3.3 with positive human actions. 4. Section 4: It may be worth including the coming need for "net biodiversity gain" alongside the duty to "conserve biodiversity" (although this is well covered in 4.12 and elsewhere in the document). 5. Section 5.5: key issue - carbon in soils. 75% of the carbon in forests is in the soil not the trees. [...] Carbon, however, is released with soil disturbance. [...] Poorly delivered tree planting can disturb soils and release carbon, especially if this disturbance extends deep into the soil profile. It can take decades for tree growth to make up the losses caused by soil disturbance from 	<ol style="list-style-type: none"> 1. Noted with thanks. 2. Section 2 has been reviewed and amended. 3. Para 3.3 has been reviewed and amended. 4. Noted. Para 4.16 specifically addresses this item. The progression of the Environment Bill is being monitored. Section 4, as a whole, and relevant actions will be kept under review as appropriate. 5. Paras 5.5 & 5.6 have been reviewed and amended. 6. Noted. 7. Para 5.21 and actions supporting Objective 2 & 4 have been reviewed and amended. 8. This principle is reflected under Objective 4 and the Council will keep this specific suggestion noted for further investigation. 9. Noted: we will keep the plan under review with regard to this. At present and in the short to mid-term there is little additional capacity to commit the Council to this. Nonetheless we will share our data with and continue to support others who are in a better position to follow this

	<p>planting. We probably need to emphasise that tree planting must be done sensitively to avoid this problem. Natural regeneration suffers less from losses from soil disturbance [...]</p> <ol style="list-style-type: none"> 6. Section 5.7: "Very good!" 7. Section 5.21: Better resilience to climate change effects is achieved through a greater emphasis on natural regeneration. 8. Section 5.23: Investigate the possibility of funding through Payment for Ecosystem Services. 9. Objective 1 / section 6.6 - Paragraph 5.21 refers to a woodland opportunity heatmap and it may be useful to raise this in the actions to deliver objective 1. A good use of survey and data will be to identify areas for woodland regeneration. 10. A suggestion to encourage citizen science to assist in identifying outbreaks of Oak Processionary Moth. 	<p>up, such as the Sussex Biodiversity Record Centre.</p> <ol style="list-style-type: none"> 10. Noted: Please also note that WSCC is currently drafting its action plan for OPM. We are in constant communication with Forestry Commission who have recently removed an infestation at Buchan Country Park.
Private Landowner	<ol style="list-style-type: none"> 1. Would support all measures for corridor planting 2. From an urban tree point of view would you be looking at large trees as well as the more fashionable and low maintenance trees that have been planted over the last 20 years? It would be good to know that as many new housing projects have the bare minimum of trees with no long-term habitat or climate change potential. The other issue seems to be replacement and maintenance of these trees where the housing has been completed [...]. 	<ol style="list-style-type: none"> 1. Thank you. The Council looks forward to engaging more meaningfully with the Goodwood Estate to learn from your experiences as part of the implementation of Objective 5. 2. Noted. The County Council will be working with our colleagues in Districts and Boroughs as the relevant new government guidance emerges from the Housing White Paper. The Tree Plan will be kept under review. Actions supporting Objective 5 have been reviewed and amended.
Countryside and Policy SDNPA	<ol style="list-style-type: none"> 1. The draft plan is thorough and sets out West Sussex County Council's ambitions for trees in a clear manner. 2. Possible use of imagery and the making of a Vision statement? 3. It would be beneficial to show how the West Sussex Tree Plan relates to the South Downs Partnership Management Plan as it does with others under section 4 with local policy. Also under 4.27 it's imperative to mention the 	<ol style="list-style-type: none"> 1. Noted with thanks 2. There is no intention to use imagery within the document at this time nor add a vision statement. 3. Section 4 is largely focussed on national policy and legislation that effects how we manage our trees and the internal policies that we have direct control over. The SDNPA Local Plan is referenced at para 4.27. The Council looks

	<p>South Downs Local Plan which is the planning policy guidance for all planning within the SDNP.</p> <ol style="list-style-type: none"> 4. Section 5.2: Data and intelligence is just based on liability but will apply to other key areas of work 5. Climate change – statement seems to write trees off and is full of false statement e.g. carbon from dead trees is released into the atmosphere when in fact it is absorbed into the soil through mycorrhizal activity. Any statements must be referenced to scientific documents. 6. Will the delivery plan be SMART with targets? 	<p>forward to working with all our Local Authority colleagues in the future to identify how trees can be managed in the wider context.</p> <ol style="list-style-type: none"> 4. Noted. However, for the purpose of this document it is imperative that we focus on our priorities first. Please note that we will make the data available for others who are able to extract additional information from it. 5. Paras 5.5–5.7 have been reviewed and amended. For the purpose of clarity the intention is to keep the Tree Plan reference free. Please note that intention for paras 5.5-5.7 is to indicate that carbon sequestration using trees is more than simply planting them and that they shouldn't be considered the only option available. 6. The Tree Plan is a high level document. The delivery plan will be constructed in a SMART manner where know metrics allow us to do so.
Woodlands: South East and London Forestry Commission	Refer to Regional FC response from Mathew Woodcock	Noted
Partnerships & Expertise: South East Forestry Commission	<ol style="list-style-type: none"> 1. Statistical woodland data and references has been provided 2. Recommendation to link the commercial ambitions Tree Plan with the ambitions of Your Energy Sussex. 3. Section 1.3, specific reference to ash dieback and the detrimental impact on recovery caused by deer. 4. Information is provided on the latest market assessment for wood products. 5. As well as providing ecological, landscape and social benefits the counties trees and woodland also provide many opportunities for employment and provide the 	<ol style="list-style-type: none"> 1. The latest summary data from FC is gratefully received. Para 3.8 has been reviewed and amended. 2. Noted. This forms part of the delivery of objective 4. 3. Noted. This information is being passed on to the ash dieback project manager 4. Noted. The information provided will inform the delivery of objective 4. 5. Noted. The information provided will inform the delivery of objective 4.

	<p>backdrop for many more! Trees, woods and forestry are an integral part of land management.</p> <ol style="list-style-type: none"> 6. Recommendation to include water quality 7. Historical references provide to inform relevant text 8. Section 4.7 include a link to the recently revised guidance on 'Tree Felling – getting permission' 9. Section 4.8 Note: disease alone does not constitute an exemption from the need for a Felling Licence 10. Reference made to the Committee on Climate Change's report. 11. Advisory: use modern mechanical tree management equipment to assist in achieving a proactive approach. Working in partnership with neighbouring landowners is encouraged. 12. Objective 3: Perhaps reference to 'increasing resilience in our woodlands and wider treescape' perhaps through increasing diversity of tree age, species, provenance and management regime. 13. Objective 4: Perhaps include reference to encouraging woodland design which delivers multiple benefits including green commuting corridors – better linking urban communities to our countryside. 14. Objective 5: Recommendation for an 'adopt a tree' initiative and schools projects. A sign post to community funding is provided. 	<ol style="list-style-type: none"> 6. Paras 2.8 & 2.9 have been reviewed and amended. 7. Paras 3.1 & 3.2 have been reviewed and amended. 8. Noted. This will become part of guidance documents to support the Tree Plan. 9. Noted 10. Noted. Paras 5.5-5.7 have been reviewed. Amends made in the light of comments received by Dr Tony Whitbread cover this theme as it relates to carbon sequestration and natural regeneration. 11. The Tree Plan's purpose is to assist in a proactive approach to tree management. Please note that the cost-benefits of using specialised plant machinery are being investigated as part of the ash dieback action plan. Working with neighbouring landowners and other partners will be addressed through the implementation of objective 5 and the delivery of the ash dieback action plan. 12. Noted. The subject has been addressed in the review of the document following Dr Whitbread's advice. In addition to amends made objective 5 also seeks to address this. 13. Noted. This form part of our detailed investigations going forward. This is also an area that will be delivered through the implementation objective 5. 14. Actions supporting objective 5 have been reviewed and amended to investigate the viability of 'adopt a tree'. Schools projects will form part of the detailed delivery of objective 5. The funding opportunity is noted.
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<p>Trees: Development Management</p> <p>Chichester District Council</p>	<ol style="list-style-type: none"> 1. The submitted draft plan addresses a number of the fundamentals in how important trees contribute to sustainability and quality of life and I hope it can be implemented and enables and adds weight for other authorities to create their own policies for the future sustainability of trees within the County. 2. Comment on the need to engage with stakeholders in the delivery of a strategy in the long term. 	<ol style="list-style-type: none"> 1. Noted with thanks. 2. Noted. In the short term, the Council's intention is to establish a forum of stakeholders to identify and work together on key issues affecting trees in the county.
<p>Private Landowner</p>	<ol style="list-style-type: none"> 1. In general, I think this is an excellent initiative and the document is fairly comprehensive and very well and clearly written. 2. Justified request to include fruit trees and orchards including traditional orchards and local varieties. 3. Section 2.9: address excessive sediment entering watercourses and the benefits of riparian trees. 4. Section 3.11: There is no mention of squirrels and deer, both currently out of control and having a serious impact on the establishment of new trees and woodlands and the management of existing woodlands. [...] 5. Greater clarity and accessibility to WSCC's Registered Title to highways verges and other land. 6. There should be a commitment to make WSCC's tree safety survey results publicly available. 7. Section 5.11: Strengthen cooperation and coordination with private landowners regarding road closures to increase cost effectiveness; specific reference to ash dieback. 8. Section 6.14: 'Donate a Tree' scheme (para 6.14) to be expanded to encourage developers and other private sector landowners to plant street trees in both urban and rural settings. Concern raise at Highways' frequent reluctance to adopt highway verges in new development or accept liability for street and roadside trees. 	<ol style="list-style-type: none"> 1. Noted with thanks. 2. Noted. Our current intention is take this detailed item forward to inform the delivery of Objective 4 & 5. 3. Paras 2.8 & 2.9 have been reviewed and amended. 4. Noted. This wider point on mammalian pests is known and the impact on restoration plans has also been raised by the Forestry Commission. Managing their impact on future recovery plans will form part of our action plans however this is a topic that can be discussed further through the proposed annual tree forum. 5. Noted. The Council is aware this issue and will seek to investigate potential solutions as part of the delivery of the ash dieback action plan. The recommendation has also been recorded as a detailed point to be addressed under Objective 5. 6. Noted. This will be investigated further as part of the delivery of objectives 1 & 5. 7. Noted. This is an issue being specifically explored through the delivery of the ash dieback action plan. The detailed delivery of objective 5 will now carry this issue forward for further investigation and reporting. The proposed annual tree forum will assist in identifying mechanisms for co-ordination.

		<p>8. Para 6.14 has been reviewed and amended. The concern raised has been noted and will be reviewed with the relevant teams. It is worth noting that the planning white paper has recognised this, at least in part and seeks to ensure a greater number of street trees with every new development. Unfortunately, every tree adopted by the High authority comes with a cost burden therefore new ways of financing their management must be sought. This will also be addressed through the implementation of Objective 4.</p>
Private Landowner	<p>1. Fully endorses everything set out by Sebastian Anstruther.</p>	<p>1. Noted.</p>
Local Partnerships: South East and London Forestry Commission	<p>1. The three strategic aims that are currently framed around “maintain”, “protect”, “improve”. We would encourage a shift of aims to “protect, improve, expand”.</p> <p>2. Climate adaptation of woodlands: [...] being proactive in considering how the climate will change in West Sussex [...] the council should consider which species, and their seed stock provenance [...].</p> <p>3. Offer of advice and upskilling to assist in managing the impacts on trees and woodlands from climate change. Specific reference to ash dieback.</p> <p>4. ‘Sponsor a tree’ to be improved to include the concept of ‘right tree, right place’. Reference to urban tree failures.</p> <p>5. We have also noted the comment of “other types of natural capital [that] may be established more quickly than new woodland as ‘carbon sinks’”. We would appreciate clarity and examples of what these would be.</p>	<p>1. The term ‘improve’ allows us to pursue actions to promote higher quality woodlands as well as expansion.</p> <p>2. Noted. This will feed into the creation of the operational tree plan (in development). The concepts of right tree, right place and following review and amendment, the increased emphasis on natural regeneration will meet the spirit of this comment.</p> <p>3. Noted with grateful thanks. We look forward to exploring with you how best FC can assist the Council in responding to ash dieback.</p> <p>4. Para 6.14 has been reviewed and amended. The existing ‘Sponsor a tree’ scheme will be reviewed to ensure compliance with ‘right tree, right place’.</p> <p>5. Para 5.7 addresses the wider point of the right carbon sink in the right place. The aim is to encourage the policy maker or action plan deliverer to think twice before assuming trees are the perfect carbon sink in all situations. For example, planting trees on a relatively species rich meadow would be inappropriate. Where</p>

		<p>available land is scarce funding might be put into establishing off shore kelp forests. Improving existing woodland soil health by modifying management practices could yield higher increases of carbon storage than planting alone. Para 5.5 has been reviewed and amended to reflect the importance of woodland soils as carbon sinks.</p>
<p>Regional External Affairs: South East Woodland Trust</p>	<ol style="list-style-type: none"> 1. We strongly welcome the opportunity to work with West Sussex County Council to identify new opportunities for funding and partnership projects. <p><u>Maintain</u></p> <ol style="list-style-type: none"> 2. We support policy that presumes in favour of tree retention, with tree removal and replacement as a last resort. We strongly encourage setting a ratio for tree replacement, in line with the Woodland Trust’s guidance on Local Authority Tree Strategies. 3. We recommend mapping appropriate locations for tree planting in partnership with local communities. 4. The Trust’s Lost Woods of the Low Weald and Downs project is an example of partnership working to improve the management of ancient woodland across the project area: we would be very happy to discuss including appropriate WSCC sites in the project. <p><u>Protect</u></p> <ol style="list-style-type: none"> 5. [...] Ancient woodland has specific protection in the NPPF, and we ask that this be reflected in the council’s policies, [...] we encourage policies that explore its potential for delivery of major tree planting and woodland creation, the construction of wildlife bridges and green corridors and the restoration of damaged ancient woodland. <p><u>Improve</u></p> <ol style="list-style-type: none"> 6. We strongly support this approach and suggest it should be underpinned by specific targets for tree canopy cover, [...] 	<ol style="list-style-type: none"> 1. Noted with thanks. 2. Noted, this detail will be addressed in the emerging Operational Policy and balanced with the opportunities taken to allow natural regeneration. 3. Noted. To be investigated as part of the delivery for the delivery for the actions under Objective 5. 4. Noted. An existing ongoing discussion. 5. This recommendation is noted and will be addressed through the delivery of for the actions supporting Objective 2 6. Targets at this stage are not possible but will be kept under review. Stage 1 is to establish sound data collection, collation and analysis. Once we understand the existing tree resource, rates of loss, available areas to expand into and the financial flexibility to support this we can then commit to firm realistic and achievable targets appropriate to West Sussex. We note the actions within the ETP and will be using these to inform our delivery going forward. 7. Noted with thanks. We look forward to working with you. Reference Objectives 1 & 5. 8. Noted. With reference to Objectives 1 & 5 we will work with our partners to help establish data grounded targets. The progression of the Environment Bill is being monitored closely.

	<p>7. The Sussex LNP has identified priority areas for woodland creation as part of its Natural Capital Investment Strategy. The Woodland Trust is supporting this mapping exercise and can advise on the presence of ancient woodland for restoration and regeneration, as well as the best sites for new woodland creation.</p> <p>8. Many of the district councils within West Sussex have already produced plans for increased tree cover as part of climate and biodiversity action plans. There is also the emerging national requirement for biodiversity net gain [...]. By setting these within an overall county tree target, WSCC can exercise its leadership and convening role, while encouraging delivery at district level and through partners.</p> <p>Objective 1</p> <p>9. The Woodland Trust can assist the Council with supplying a range of data.</p> <p>Objective 2</p> <p>10. A signpost to Woodland Trust guidance</p> <p>11. WT encourages a 'green thread' running through all council policies, noting the value of trees and woodland for education, mental well-being, air quality and as part of the local economy.</p> <p>12. WT highlights opportunities for funding and support.</p> <p>Objective 3</p> <p>13. One key action the Council can take is to specify UK&Ireland sourced & grown (UKISG) as the standard for tree procurement and to encourage this as the standard for procurement across the county, for example by inviting landowners and practitioners to sign up to a West Sussex tree procurement pledge.</p> <p>Objective 4</p> <p>14. Woodland creation and active woodland management has great potential for generating inward investment and income, we advise that timber production should be on a conservation-led basis.</p>	<p>9. Noted with thanks. We welcome the opportunity to develop our working relationship.</p> <p>10. Noted with thanks.</p> <p>11. Noted. In addition to the delivery of the actions under Objective 2 that will help deliver this the West Sussex Climate Change strategy seeks to do likewise.</p> <p>12. Noted, this point will inform the delivery of Objectives 4 & 5.</p> <p>13. Noted. We will ensure this is worked up as appropriate with the operational plan and added as an agenda item at the first Annual Tree Forum.</p> <p>14. Noted. To be an agenda item at the first Annual Tree Forum.</p> <p>15. Noted and we will monitor these and maintain communication with the Woodland Trust.</p> <p>16. This point will help colour the delivery of Objectives 4 & 5 and inform the Annual Tree Forum.</p> <p>17. Noted, this is underway and we look forward to working with the WT.</p> <p>18. Noted, these examples will inform the delivery of Objective 5; the examples fit well with the objective and could be implemented through the annual Tree Forum and our web development.</p> <p>19. Noted. These will each be investigated as part of the delivery of Objective 5.</p> <p>20. Noted with thanks.</p>
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	<p>15. There is a growing range of funding streams available to support Objective 4 (a short example list is provided).</p> <p>16. By making county land available for woodland creation, and signposting other landowners and organisations in West Sussex to do the same, WSCC can maximise the benefits for the local authority and the communities it serves.</p> <p>Objective 5</p> <p>17. The Council could consider holding an annual tree summit, [...] the Woodland Trust would be happy to participate in such an event.</p> <p>18. A list of potential community level projects is provided.</p> <p>19. Three current large partnership projects are highlighted for the council to endorse and promote.</p> <p>---</p> <p>20. The Woodland Trust welcomes the opportunity to work with West Sussex County Council to identify new opportunities for funding and partnership projects and to assist in further development of WSCC plans and policies.</p>	
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