

Lord Goldsmith



11th September 2020

Dear Lord Goldsmith,

England Tree Strategy

We welcome this opportunity to contribute to the development of the England Tree Strategy and see this as a defining moment for Forest, wood, and tree policy in England.

We welcome the ambition being shown by the government to raise the role of our forestry and woodland resources up the agenda and the recognition that trees have a key role to play in the nation's future, making contributions to our social, environmental and economic wellbeing.

The Small Woods Association (SWA) is a UK-wide charity, supporting those who manage, use, and own our small woodlands. Altogether, we represent over 2,300 members, who between them represent over 30,000 ha of our nation's precious woodland resources. These woodlands are predominantly semi-natural and as our members are passionate about nature and the value of trees and woodlands to society, these woodlands often represent some of the best examples of small woodland management in the UK.

Overall, we wish to emphasise the following key areas of concern:

- **The role of (small) private woodland owner and manager needs to be brought to the fore in the development of woodland management policy.** Small woodland owners and managers are responsible for a very significant resource. Although England's woodlands are split roughly 50/50 between deciduous and conifers, the land holding patterns are very different, with conifers being largely held in large blocks, whilst the majority of small woodlands are deciduous. The vast majority of this small deciduous woodland is in private hands, mostly owned by non-farmers. If we want policy to optimise the role of our woodlands, then means need to be found to incentivise improvements for the large majority of owners who have been outside the land management support system for so long. Indeed, many have long experience of grants and other incentives as being inappropriate for their needs. A great deal of work is needed to ensure that policy is better developed for and more clearly focussed on this very significant group.
- For example, **a level playing field needs to be established regarding incentives.** The CAP focused primarily on farming land managers and often excluded or de-prioritised woodlands and their non-farming owners. Critically, this mistake appears to be in danger of being repeated in the development of ELMS. In our response to the ELMS consultation we made it clear that it was not acceptable to have the first

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Small Woods Association, Green Wood Centre, Station Road, Coalbrookdale, Telford TF8 7DR
Telephone 01952 432769 www.smallwoods.org.uk

tier of support confined just to farming landowners. This would mean woods owned by a farmer eligible for **Tier 1 support**, when a neighbouring non-farmer owned woodland would not.

- **Ensure that the need for woodland management is understood by policy makers at all levels.** Public policy should make management viable in future – not just planting. Although we support the general push to increase woodland cover, we and the rest of the Forestry sector would be opposed to the creation of large areas of low value, unmanaged woodlands. High value, well-managed woodlands can provide all the environmental and social benefits that the public wants to see, at the same time as supplying an increasing proportion of our timber needs and providing sustainable livelihoods. We therefore would like to see a series of strong policy imperatives underpinning the management of newly created woods, otherwise the value of our focus on the expansion of woodland cover will be largely wasted.
- **Assurance Frameworks** – UKFS is too demanding for small woodlands. An alternative light touch approach is required, such as that currently under development through FSC.
- **Coppice restoration** – coppice is a sector that was deliberately diminished by public policy for much of the 20th century. The importance and value of coppice is now being recognised increasingly, for instance SWA is running a project that is identifying the Carbon sequestration benefits of coppice woodland exceed that of most other woodland management. New initiatives are needed to further develop the coppice sector, and maximise its potential to provide widespread environmental, economic, and social benefits.
- **Skills** – woodland owners and managers frequently prioritise the need for training and awareness raising in forestry skills and techniques. It has been hard to find support for this activity in recent years. New funding is needed for skills and training for safe operation, as well as increased professional capacity at all levels, particularly in the provision of advice from trusted advisers outside the public and large-scale forestry sector.
- **Understanding of the need for infrastructure.** Well managed woodlands require infrastructure. This point appears not to be understood by the planning system, which often does not regard small woodland management as forestry. This includes structures in woodlands, processing and drying areas, tool stores, shared infrastructure, e.g., woodland hubs and facilities for low key housing for workers, noting that woodland management is a low paid sector, novel approaches are needed.
- **Complementary and coherent regulatory frameworks** – The relative low priority afforded to woodlands in national frameworks leads to a low level of protection, for example for Ancient Woodlands. It also leads to inconsistency in the way that regulatory frameworks are applied, for example between local authorities. Our experience is that planning teams often do not understand the needs of either the

small woodland or wider forestry sectors, and awareness raising is needed. National guidance is needed that gives woodland owners certainty. The coherence of the policy frameworks that affect woodlands and their owners and managers needs to be kept under review by ministers, informed by regular meetings with representatives of the sector, such as Small Woods Association. No such meeting has taken place for well over 5 years.

- **Long term consistent policy and financial support** – finally, the sector needs certainty. Pendulum swings of the policy and support be-devil the sector. An ambitious agenda put forward by this government should be established in such a way that it is supported by all stakeholders.

In addition to these main concerns, we have two further issues and questions:

- What will the status be of the final England Tree strategy – where does it fit, what are the boundaries, what mechanisms will there be to implement anything. Where does it sit in the hierarchy of all of the other consultations that have taken place e.g. ELMS etc.
- Has there been broad enough engagement with the wider population? This has been quite a technical exercise and the general public has not been generally included, particularly in the absence of public meetings, such as were held in the development of the 25 Year Environment Strategy.

Thank you for your attention. We have set out more detailed responses in the attached table and our response to the online questionnaire.

Yours sincerely,

Ian Baker
Chief Executive