



## **Small Woods' response to the England Tree Strategy consultation**

**September 2020**

Responding to the consultation:

Small Woods Association (SWA) has set out its main concerns in the covering letter to which this document forms an annex. In the following pages we have taken the consultation issues and set out our level of support and a commentary on the reasons for that support and a final column with some ideas for proposals.

Approach based on degree of support:

- Cautious support
- Support
- Strong support
- Very strong support



	SWA position	Comments	Proposals
<b>Expanding and connecting trees and woodlands by:</b>			
<ul style="list-style-type: none"> <li>increasing the supply of planting material, the size of the forestry workforce and encouraging collective agreement from stakeholders to obtain widespread support for woodland creation</li> </ul>	Support	<p>Don't want to encourage the unmanaged/underutilised woodlands of tomorrow. We want to encourage the right trees in the right place.</p> <p>Lack of understanding at a government level of the length of time that should be taken into consideration.</p>	<p>The supply of planting material needs to be increased from primarily domestic sources, which will help to improve biosecurity and UK genetics.</p> <p>Focus grant support on woodland management at an appropriate level.</p> <p>Take a long-term not a short-term view, which is effectively what woodland creation is about at the moment.</p> <p>In addition to the improvement of existing nurseries, we would advocate the encouragement of more community nurseries.</p>



<ul style="list-style-type: none"> <li>providing farmers and other landowners and managers with the right incentives through improving grant funding and simplified application processes</li> </ul>	Support	<p>Appropriate incentives are those that are set at such a level that they supports positive choices. Land managers need to want to do the right thing, not because they are being paid full market rate, but because they have been convinced by the arguments for tree planting and management, not simply because the price is right. The system should also incentivise products for which there is a market.</p>	<p>Base layer of compliance should not attract grant.</p> <p>“Other land managers” need to be on a level playing field with equal access to all tiers of support. Carbon credits could be tied to UKFS to facilitate increase in woodland management – which would need an audit arrangement which could be covered by grants.</p>
<ul style="list-style-type: none"> <li>working with partners to increase tree cover across public land</li> </ul>	Support	<p>Support for woodlands on public land being managed by local/national NGOs.</p>	<p>Provide support for woodland NGOs to improve their capabilities</p>
<ul style="list-style-type: none"> <li>encouraging private investment in woodland creation by helping to develop the market for the ecosystem</li> </ul>	Cautious support	<p>We need to see the benefits of this delivered over the long term, before committing support in this area.</p> <p>Private resources need to be committed in such a way that it does not simply seek a return, ie,</p>	



<p>services generated as trees grow</p>		<p>as part of offsetting or CSR. Profit-seeking or rent-seeking in relation to ecosystem services would seem perverse, given the need to repay the overwhelming debt owed to the natural environment.</p> <p>What profit could be made – how do you attract investors this would be difficult</p>	
<ul style="list-style-type: none"> <li>expanding tree and woodland cover to contribute to the Nature Recovery Network, which aims to create or restore 500,000 hectares of wildlife-rich habitat</li> </ul>	<p>Support</p>	<p>Where woodland is appropriate within the natural network.</p>	
<p><b>Protecting and improving our trees and woodlands by:</b></p>			
<ul style="list-style-type: none"> <li>building the capacity of the domestic UK nursery sector to ensure planting stock is bio-secure</li> </ul>	<p>Strong support</p>	<p>This would be a priority for the sector.</p> <p>The desire to increase planting will lead to an increased demand for</p>	<p>A national plan is needed to improve nursery capacity and capability, including the community nursery sector.</p>



<p>and from a known provenance</p>		<p>imported seedstock.</p> <p>Biosecurity is not just an issue for the nursery sector, it is a key concern for the sector as a whole. It is surprising that it doesn't have a higher level of prominence in the document.</p> <p>.</p>	<p>Biosecurity in relation to all imported wood products needs to be improved, so that we keep out diseases that might be imported as products or as packaging. Initiatives are needed to improve silvicultural practice to improve quality of home-grown timber, e.g., UK oak to rival French in quality</p>
<ul style="list-style-type: none"> <li>reducing damage to woodlands through the sustainable management of invasive species</li> </ul>	<p>Very Strong support</p>	<p>Control of deer and squirrels is a priority and a determined but nuanced response is required. We need to be realistic however, that human consumption of wild caught meat has suffered reputational damage through the Covid pandemic.</p>	<p>A public awareness and education programme is needed as a key part of the system. There is significant resistance to lethal control. Greater awareness is needed of damage, opportunities to influence the people with increased interest in woodlands and the environment.</p>
<ul style="list-style-type: none"> <li>stronger protection for ancient woodland sites, building on newly proposed</li> </ul>	<p>Very strong support</p>	<p>There is a glaring hole in our national designation system, in that ancient woodlands can be sacrificed in the way that we have</p>	<p>Ancient Woodlands should be given a higher level of protection and given a significantly higher</p>



<p>measures of the Environment Bill which give communities a greater say in the protection of local trees</p>		<p>seen for recent major developments.</p> <p>Large numbers of small woodlands and owners are needed to create an environment for positive management of woodlands. Need to be careful that the planning system does not stop activity.</p> <p>Protection of woodland without detailed control at low levels.</p> <p>Designation does not appear to have been effective in their protection as this can be overridden by the current system, simply because it is believed that the economy is more important than protection of our ancient woodlands.</p> <p>Even though planning does include protection this isn't currently working effectively enough to protect our Ancient Woodlands.</p> <p>Climate change is also a huge threat to ancient woodland, so</p>	<p>value in Cost Benefit Analysis in development.</p> <p>At the same time, sympathetic management should be made easier in line with UKFS and/or management plans.</p> <p>Natural capital value – ancient woodland also has cultural value and this should be taken into consideration.</p>
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<ul style="list-style-type: none"> <li>increasing the percentage of woodlands in active management</li> </ul>	Very Strong support	<p>Our woodlands are significantly under-managed, possibly as much as 50%, according to FC data.</p> <p>Acknowledgement that there are differing views with respect to management.</p>	<p>More information is needed about these unmanaged woodlands and the reasons for their under-management.</p> <p>Awareness raising support and technology transfer is also needed by small woodland owners.</p>
<ul style="list-style-type: none"> <li>adapting treescapes and woodlands to the future climate and maximising the benefits they can provide to support adaptation measures, such as natural flood management and</li> </ul>	Very strong support	<p>Trees, woodlands and woodland products have a key role to play in assisting climate change adaptation and mitigation.</p> <p>Learning from others – collective experience is very important.</p> <p>How would this information and shared experience be gathered, collated and shared?</p>	<p>For example, we recommend use of coppice products and forestry by-products in flood mitigation and soil protection.</p> <p>Engineers and procurement systems need to be educated in the greater value of green infrastructure approaches</p> <p>Given our increasingly unpredictable climate, we need species that could survive with</p>



helping improve the resilience of wildlife			increasing temperatures along with unpredictable frosts.
<b>Engaging people with trees and woodland by:</b>			
<ul style="list-style-type: none"> <li>providing more and better-quality green infrastructure – including in urban areas – to make towns and cities attractive places to live and work and bring about long-term improvements in people’s health</li> </ul>	Strong support	<p>This starts at the design and planning stage and requires a strong planning system to deliver. We need approaches that avoid the race to the bottom in green infrastructure that have emerged in recent developments over the past 10 years.</p> <p>Urban fringe woodlands have seen a massive increase in use during lockdown and they are very important to the community. But there are few resources for their management.</p>	Any infrastructure provision needs to be backed with resources for management being locked into a local landscape management system. Too many financial contributions have been siphoned off into private companies which have done the minimum, or expensive hard engineering which provide minimal environmental benefit.
<ul style="list-style-type: none"> <li>supporting Community Forests to create new woodlands and</li> </ul>	Very Strong support	A hugely important aspect of the woodlands that are likely to be used most often by most people.	Re-establish the national Community Forest support programme.



<p>facilitate access to existing woodlands</p>		<p>Community forests are being lost, even though they are providing so much of what the nation needs. See notes above.</p>	
<ul style="list-style-type: none"> <li>• closer engagement with the education and health sectors, developing skills and expertise in the forestry sector to support health programmes through social prescribing</li> </ul>	<p>Very Strong support</p>	<p>The reality of an expanding woodland cover is that a massive increase in skilled workers is needed and this includes those working in health and wellbeing. This is an area where SWA can make a distinctive contribution. This is where people do get value from woodlands and access to woodlands. How could this be better? <b>Planning issues</b> – examples of problems for Forest Schools as planning consent is asked for in some cases.</p>	<p>Direct support from health trusts is important to help make this work. Upskilling is critical to help meet potential demand. SWA could share these messages and this could be transferable to work in England. National planning guidance is required to support social forestry initiatives, such as Forest Schools. Definitions of forestry should be defined within planning legislation. Greater consistency across the UK with respect to interpretation</p>



			of current forestry permitted development.
<b>Supporting the economy by:</b>			
<ul style="list-style-type: none"> <li>growing the market for wood products, and supporting and upskilling farmers and land managers to add trees to their business</li> </ul>	<p>Support Strong support for upskilling land managers</p>	<p>There are generic skills and simple pieces of machinery that can be operated by land managers with generic skills.</p> <p>More complex work needs higher levels of skills which are best left to specialists.</p> <p>Scope to increase the markets for wood products.</p> <p>A major issue is the significant proportion of our timber products that are imported.</p>	<p>Better integration of trees and woodlands into farm management for timber and non-timber markets and benefits.</p> <p>Woodland owners should be encouraged to facilitate access for social uses – e.g. forest schools this can also have an economic value.</p>
<ul style="list-style-type: none"> <li>supporting the sustainable timber industry and increasing the use of all domestic forest products including</li> </ul>	<p>Support Strong support for forest biomass use</p>	<p>One issue that is critical is ensuring that the sector is able to sell forest biomass. An unintended consequence of air quality legislation could be to undermine local woodland management economies.</p>	<p>Imported charcoal – add more import tax.</p> <p>Biosecurity levy.</p> <p>Trade incentives for home grown products.</p>



timber and forest biomass for energy			Greater focus on a homegrown woodland supply chain.
<ul style="list-style-type: none"><li>designing grants and clearer policy to increase the uptake of agroforestry</li></ul>	Support	Establishment phase is expensive, given the need to protect the trees.	Technical support is needed in addition to any grants.