

Response to England Tree Strategy Consultation, 2020

Iain McNab, Century Wood, Shropshire, iain@centurywood.uk

I would like to highlight several points which are not easily expressed in the consultation's Online Survey. I am particularly concerned that the key role of small woodlands is not overlooked.

In the 2011 National Forestry Inventory woodland map for England, **41% of the woodland hectares in England were in small woodlands of less than 20 hectares**, representing 215,000 woodlands. In the case of broadleaved woodland, more than half of the wooded hectares were in small woodlands of 20 hectares or less.

With such a large number of properties and owners, accounting for such a large fraction of the woodland estate in England, many direct approaches are not realistic. Instead, it is necessary to create a regulatory and financial environment which allows woodland owners themselves to move in the direction of the national goals for biodiversity, economic benefit, education, and health.

It must be said that the current regulatory framework frequently gets in the way of these national goals.

The principle problem is with the planning system. There is a postcode lottery as local planning authorities are inconsistent in what activities they class as forestry or as reasonably necessary for forestry. This undermines the General Permitted Development Order's grant of permitted development rights for structures reasonably necessary for forestry. This leads to three proposals:

- 1) **Consistent national guidelines for the minimum size of sheds, barns etc** which will be viewed as reasonably necessary for forestry. For example, councils which are happy for growers to have 6x4 sheds on allotments smaller than tennis courts object to the idea of similar sheds in small woodlands which are hundreds of times larger in area. Storing tools on site and having shelter during the day are at least as important in small woodlands as allotments, where in both cases people are managing land on a part time basis when they have time.
- 2) **Processing wood into finished products should be classed within the definition of forestry, when using wood from the same woodland.** Charcoal makers and bodgers traditionally processed wood on site, and yet the modern continuations of these crafts are sometimes challenged by local planning authorities. Many owners of small woodlands do not have the space elsewhere to process wood into finished products, and it is inefficient to transport raw wood off site.
- 3) **Woodland-based education should be classed as forestry.** Fostering awareness and familiarity with woodlands from an early age enables people to make use of woodlands for recreation and health in later life. Many of the proposals for increasing tree cover require a new generation of foresters, often introduced to woodlands in childhood, and training in woodlands as adults. And yet, forestry based education is frequently challenged on planning grounds. Forest School practitioners report change-of-use objections to their use of woodlands, and as recently as 2018, the Dartmoor National Park Authority issued an enforcement notice to prohibit "running courses and activities available to the public, with or without payment" to stop an owner running forestry skills courses for volunteers.

A new regulatory brake on bringing small woodlands into management is the proposed framework for regulating the sale of firewood. Requiring that firewood is only sold with a ready-to-use moisture content is a positive move. But **the legal requirement to join the Woodsure auditing scheme at the cost of hundreds of pounds a year will wipe out any profit for many small woodland owners.** The sale of firewood is often one of the first ways that woodland is brought into financially viable management, and yet this policy will choke off that step for many small woodlands.