

# Questions from our consultation

This form sets out the questions we ask in a consultation on restoring and expanding open habitats from woods and forests in England that we launched on 12 March 2009. The consultation ends on 5 June 2009. You can find the consultation at [www.forestry.gov.uk/england-openhabitats-consultation](http://www.forestry.gov.uk/england-openhabitats-consultation) or contact Dominic Driver, Forestry Commission for further information (contact details below).

Comments on any aspect of the consultation are welcome, but we are particularly interested in your responses to the questions below. This form is available at [www.forestry.gov.uk/england-openhabitats-consultation](http://www.forestry.gov.uk/england-openhabitats-consultation).

<b>Your name:</b>	Rob Cooke
<b>Your organisation (if any):</b>	Natural England
<b>Date:</b>	05/06/09

No	Question.
<b>The nature of the change</b>	
1.	Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?
<p>Yes we support the upper end of this scale. However we recognise that achieving this is complicated and subject to many factors. We are therefore looking for the higher 30,000ha figure to be adopted but we are less concerned with shorter term targets, as long as progress is being made and so long as the goal is achieved over time.</p> <p>This level of intervention is necessary to ensure that restoration from woodland contributes fully to meeting the Government's agreed Biodiversity Action Plan targets for open habitat restoration.</p>	
<b>Desired outcomes</b>	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Yes we support the outcomes on the list but there should be an additional outcome on achieving the restoration of priority open habitat targets under the BAP. This issue is covered in the rationale and through the indicators, the later being concerned with recording area restored and how well species are recovering. However, given that this is a policy on restoration, it merits the headline outcome to drive the agenda.</p>	
<b>Measuring the success of the policy</b>	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
<p>The list of indicators is good but we have some comments.</p> <p>Under the outcome on ecological communities we believe that the indicator on the rate</p>	

No	Question.
	<p>and area of restoration and expansion of open habitats should be broken down by open habitat type, i.e with indicators or sub-indicators developed for each of the open habitats the policy is seeking to address. Without this subdivision the policy could become dominated by one or two of the larger target habitats and progress or otherwise on the rarer open habitat types could receive less attention (as tended to happen in the discussions over this consultation).</p> <p>With regard to the indicator covering population trends in UKBAP species, there is a likelihood that changing climatic conditions will result in significant changes in species composition to open habitats during the period of this policy. Judging the success of restoration at the same time as these changes are occurring will be challenging. We therefore recommend that either this or an additional indicator should monitor structural diversity and ecological process in order to provide comparative data over the longer term.</p> <p>Under the indicators for the financial viability outcome, we would like to see an additional indicator to capture the extent to which new employment and new forms of income generation are developed on the back of restoration projects.</p> <p>The indicators proposed for the outcome on positive engagement by local and other users covers some of the territory necessary but they do not reflect sufficiently clearly the extent to which engagement with local communities has been successful. An indicator is needed to capture this.</p> <p>We have not proposed an additional outcome that covers archaeology/cultural heritage/landscape, as the need through this policy does not seem to be of the same order of magnitude as the other outcomes. We do however consider that the policy needs to make clear reference to following best practice guidance to ensure that these issues are covered and receive attention.</p>
	<p><b>Policy proposals</b></p>
	<p><b>Elements present in the policy</b></p>
	<p><b>We will treat woodland and open habitats as potentially mutually beneficial</b></p>
4.	<p>Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?</p> <p>In principle we agree as this will increase structural variation and will be good for biological diversity and adaptive responses to changing climatic conditions. However, this does depend on the site, its scale and it is habitat and site condition specific. The headline statement here leaves open a wide range of responses as to the extent and type of woodland that could be involved, some of which will be far more beneficial to open habitats than others.</p> <p>In pursuing this approach, for all the reasons cited in the consultation, the primary focus of the policy on restoring priority open habitats should not be lost.</p>
	<p><b>A presumption against removal of 'mature native woodland'</b></p>
5.	<p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>
	<p>Yes. This does not preclude existing good practice being followed on open ground and ride management within woodlands which can support priority open habitats and species in places.</p>

No	Question.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	<p>We support this definition and the presumption against removal of mature native woodland. There may be exceptional cases where removal is desirable, for example in the case of some birch on drained peatland or with other wet woodland. In these exceptional circumstances the relative values of maintaining the woodland or restoring the open habitat would need to be assessed on an individual site basis.</p>
<p><b>We will expect practitioners to help local users to participate in development of the initial proposals</b></p>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
	<p>We strongly support the need to work with local communities and users. We support option 3 requiring an assessment of the need to consult, leading to detailed and high quality engagement where necessary. We also support option 4 in that practitioners should be offered support to deliver this.</p> <p>Option 2, encouraging practitioners to engage, is not strong enough given the difficulties that can arise, and option 1, requiring high quality engagement on all sites regardless of need, will devalue the process.</p> <p>The European Landscapes Convention offers an approach for engaging with communities to put across complex issues which we think should be explored in this context.</p>
<p><b>We will promote mechanisms for prioritising woodland removal at a regional level</b></p>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
	<p>Yes. We support the need for the delivery of this policy to operate through a national framework that is subject to regional flexibility and prioritisation. The national ETWF Delivery plan and its intended interpretation through Regional Forestry Frameworks (as they are updated) proposes such an approach, and we believe an equivalent model should be followed. Both Regional biodiversity and forestry groups need to be involved in these discussions.</p>
<p><b>We will apply a framework for evaluation to projects</b></p>	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?
	<p>We support this framework subject to the changes in the outcomes and indicators given above. We also recognise the benefit of a standard evaluation framework and believe that its adoption should be given strong encouragement. We feel however that looking to impose this could be counter productive. We support the proposal that its adoption should be linked to funding (either as a condition or that proposals that agreed to use the framework would be given priority or be processed more quickly). Where funding is not the driver, encouragement should be given and guidance to support this would be helpful. Our view is therefore that Options 2, 3 and 4 all have merit.</p>

No	Question.
10.	How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?
<p>This policy has many complicating factors, so support to practitioners would be helpful and is probably necessary. Guidance and exemplar projects have a role to play. We also think that developing a scoring system for assessing projects based on the framework could assist here, as a form of guidance itself, though it may need to be tailored for different habitats. This has already been attempted when developing some of the county heathland re-creation plans, with projects scored/prioritised depending on: size, soil type and characteristics, remaining open habitat present, time since habitat was afforested, practicality of management as open habitat etc. Natural England would be happy to work with the Forestry Commission on this.</p>	
<p><b>To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.</b></p>	
11.	Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?
<p>Yes we support this principle. We do not, however, wish to see it applied mechanistically as this may restrict restoration proposals. Our view is that we would wish to see this principle applied but balanced over time, so we are closer to the first option. We also agree that the threshold needs to be considered at the regional level.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
<p>We have concerns that the threshold of 1,100ha/yr is too low, partly as a result of being calculated against last years woodland creation figure (a sharp drop on previous yearly totals), and partly because of the difficulty in getting accurate figures particularly around the level of woodland that is being lost (which you describe in the evidence paper). Because of the uncertainties we accept the threshold put forward on the basis that it is reviewed when more accurate figures are produced through the National Forest Inventory later this year.</p> <p>However, given that we support the goal over time of a high total level of restoration of open habitat, the need to avoid net deforestation and the need to significantly expand woodland cover for a variety of reasons, there is an urgent need, to increase woodland creation above current levels.</p>	
<p><b>Key variables</b></p> <p><b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b></p>	
13.	Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?
<p>This question is difficult to answer in detail. The simple answer is that the greater the level of restoration or expansion of priority open habitats, the greater the contribution to biodiversity objectives, although some of these will take time to be realised. Other factors that need to be considered include size, connectivity, soil type and characteristics,</p>	

No	Question.
	<p>remaining open habitat present, time since habitat was afforested etc. As important, given the predicted impact of changing climatic conditions, is to ensure that we create the habitat conditions that provide opportunities for a range of species, through structural diversity of micro and niche habitats, and allowing scope for natural processes to occur.</p>
14.	<p>Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the outline practices presented? How could we best ensure that such practices are adopted?</p>
	<p>We support the position that every effort should be made to minimise carbon emissions during restoration. We also offer our support to work with the Forestry Commission to explore the carbon implications of different restoration scenarios and to develop guidance on how to minimise carbon losses. We also offer the following comments:</p> <p>We would like to see a significant proportion of the arisings from clearance (and from subsequent management) used, the obvious example being for woodfuel. The potential of 'Biochar' should be established over the timeframe of this policy and, if this turns out to be a practical and cost effective end use, this could provide a simple way of dealing with the arisings on site, minimising handling and transport.</p> <p>We support the view that there should be a presumption against removing commercial crops nearing maturity so that that they are able to maximise their value for a variety of reasons, including that this will provide higher product substitution values against materials with a higher carbon footprint. In practical terms there will in general be easier targets to prioritise which make more economic sense, although we can foresee circumstances which over-ride this.</p> <p>We support the position not to remove stumps as this will significantly increase soil disturbance resulting in significant additional carbon loss.</p> <p>It will be important to highlight the risks of significant carbon losses from operations on peat, especially blanket bog. This is something that could be addressed through the production of good practice guidance for carbon and open habitat restoration (possibly as part of the UK Forestry Standard guides).</p>
15.	<p>Do you agree that it is appropriate to include impact on long-term average carbon store <i>and</i> loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?</p>
	<p>The real issue here is to get agreement over the approach taken to measuring reduced sequestration and substitution potential. We would be happy to work with the Forestry Commission to explore this.</p>
16.	<p>Where do you think the appropriate balance lies between achieving biodiversity objectives and the need to reduce carbon emissions? What processes might help to make this judgement?</p>
	<p>We believe that the carbon impact of the policy must be minimised. We do not support the view that carbon impact should be given equal weight regardless of the site as there are likely to be cases where exceptional wildlife benefit comes with a strongly negative carbon balance. We support the principle overall, on the basis that individual sites are assessed on a variety of factors. We also believe the role of compensatory planting/woodland creation should be included in this judgement, as a means of off-setting emissions.</p>

No	Question.
	<p>Another issue here is the need to improve our understanding of the carbon implications for different approaches to deforestation that this policy could produce. Only if this shows a wide variation and significant carbon losses should this lead to a reassessment of the biodiversity objectives. We would wish to contribute to such work.</p>
<p><b>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</b></p>	
17.	<p>Outside SSSIs, do you agree that a more dynamic attitude to land management could deliver equivalent or greater gains for open habitats and species than one where success for all sites is based on assessments of condition as applied to SSSIs?</p>
<p>Outside of SSSI's, where desired condition is defined, we support the principle that a more dynamic approach should be explored. Habitat mosaics from more closed woodland through scrub to open ground in general are very important for biodiversity and also add to visual diversity at the micro-scale. They are more representative of the conditions that may have occurred in 'naturally' grazed situations and there is little of this sort of habitat mosaic present in England. More dynamic approaches to restoration could also have a significant role to play in adaptive responses to climate change. However, much of the value of this approach depends on scale with a more dynamic approach being more appropriate on large sites (or where the total area of the site in question is being added to through woodland creation), as well as other factors including site conditions and connectivity.</p> <p>We also need to consider the long term sustainability of the different open habitats being restored, as all these habitats are likely to undergo both structural and taxonomic changes over the next few decades and longer in response to changing climatic conditions. In time this will mean that current definitions of favourable condition will also change. However, the evidence available points to the benefits to open habitat species of semi-natural open habitats overall and the maintenance of variation in structure within them. In this context, dynamic management needs to apply to the micro-habitat and niche scale too, as open habitat BAP species requirements are (largely) associated with bare land, scrub and other structures. For example, we should not be overly worried if <i>Calluna vulgaris</i> dominated heathland becomes a parched heath-grassland as long as it is structurally rich.</p>	
18.	<p>If so, how might such an approach be developed? Is there scope for modifying the conservation objectives on some SSSIs to incorporate a similar approach? If not, do you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?</p>
<p>We do not think that all sites need to be or should be judged against SSSI favourable condition criteria (there are clear parallels between the treatment of SSSI woodlands and ancient woodlands more generally). However, we believe that a useful way forward would be to adopt the same framework as offered by favourable condition but to use different thresholds, as with HLS.</p> <p>It may be that the conservation objectives for some SSSI's could be modified to take a more dynamic approach, but this needs to be considered against evidence that this approach is working elsewhere and reviewed on a site specific basis: we do not support it as a point of principle.</p>	
<p><b>What level of woodland removal due to restoring or expanding open habitats</b></p>	

No	Question.
<b>could avoid a significant negative impact on the timber industry?</b>	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
<p>We recognise that this is a concern but have no information to offer. It is important that any influence this has on the policy is based on clear evidence, however we also understand that industry confidence is an important factor too.</p>	
<b>Different approaches to applying policy</b>	
20.	Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?
<p>We support a combination of options 2 and 3.</p> <p>Option 2 is important because it most clearly presents the driver for this policy, which option 3 fails to do. However, option 3 does provide some realism over practicalities that is missing from option 2. We do not support option 1 as this is far too limited in its scope and overly negative. It does highlight, however, the importance and priority that should be given to creating viable management units.</p> <p>We believe the starting point for applying this policy should be to focus on those past open habitats that are the most restorable and the most sustainable. Defining what 'most restorable' means in practice needs more work. We think more reference should be given to the policy on the restoration of PAWS in Keepers of Time as these should be seen as parallel policies.</p>	
<b>The role of compensatory planting</b>	
21.	What is the appropriate role of compensatory planting in this policy?
<p>We do not in general support a formal link between restoration projects and creation ones as this will put a significant break on the amount of restoration that occurs. We do however support moves to encourage links and in some cases, particularly with larger scale restoration proposals, would agree that it is desirable to link compensatory planting at the landscape scale, expanding out from the site in question. Overall we believe it is important to balance compensatory planting with restoration nationally but with a regional dimension too.</p> <p>Compensatory planting needs to ensure that there is no net loss of native woodland within the overall totals.</p>	
<b>Factors to consider when deciding which policy is likely to work best</b>	
22.	Have we developed a reasonable set of questions for informing the decision on which policy is best? Do you wish to suggest any changes to the list of questions?
<p>Our answers cover suggested changes.</p>	
<b>Implications for delivery mechanisms</b>	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
<p>No. In the case of HLS we do not foresee any major problems in targeting support at</p>	

No	Question.
	<p>eligible sites (privately owned or tenanted with a 10 year or greater tenancy) to support management or through special project funding for issues such as remedial scrub clearance. The important factor here is that proposals are identified in good time in Natural England's Regional tactical Plans so that budgets can be allocated.</p>
	<p><b>Other comments</b></p> <p>We welcome your input on any other aspect of this consultation.</p>
	<p><b>We wish to stress again the importance of stimulating potential markets on the back of this policy, as a means of off-setting costs, as well as recognising the employment associated with managing open habitats.</b></p> <p><b>Restoration of open habitats should be seen as an opportunity to develop wider public benefits too, in particular the opportunity to develop recreation and access provision.</b></p> <p><b>We have some concern over the way the costs of restoration are presented. There are two elements to this. Firstly, the use of the average costing has the drawback in that the policy is clearly pointing to the priority of restoring larger sites where costs are lower, plus there is likely to be a presumption against restoration from higher yielding forests. We therefore believe the average costs of the restoration that follows could be lower than the figure given and recommend that more work is done to tease this out once the policy direction is agreed. The second concern relates to the woodland/forestry focus of the costings given. This is important but we believe that wider context needs to be given too, in terms of how this level of support fits with other established support through Environmental Stewardship, together with some comparison of what the costs of meeting the Government commitment to open habitat restoration/creation would be from other land uses. In value for money terms, the cost of restoring open habitats from unproductive forests is likely to be the cheapest way of making progress towards the BAP targets: this important message does not come across.</b></p> <p><b>Restoration of open habitats will impact on many BAP priority species, some of which require specific conditions and management responses. Given the scale of restoration this policy proposes, species specific guidance to inform local decisions should help. For example, the impacts of restoration generally will be positive for reptiles and largely a neutral impact for amphibians (major benefit to natterjack toads), although the impact could be negative if restoration occurred close to important amphibian breeding sites. Using this example, we would therefore support the development of specific guidance to inform restoration proposals on the impact on reptiles and amphibians, and recommend that existing guidance relating to European Protected Species is used as the starting point.</b></p> <p><b>Natural England has carried out research on the impact of heathland creation on archaeology and soils which provides some guidance on how to avoid damage. More general guidance should be considered.</b></p> <p><b>There are instances where wood-pasture and parkland, itself a priority BAP habitat, could benefit from the removal of woodland. While not included in the definition of open habitat, there is the danger that this priority habitat will fall between this policy and the one covering plantations on ancient woodland sites.</b></p>

Please include the “information about you” form with your response.<sup>1</sup>

**Please send your completed forms to:**

[Dominic Driver](#)

Senior Projects Officer | Policy and Programme Group | Forestry Commission England

620 Bristol Business Park | Coldharbour Lane | Bristol | BS16 1EJ

0117 906 6003 | 07779 627668 | [oh.consultation@forestry.gov.uk](mailto:oh.consultation@forestry.gov.uk)

Fax: 0117 931 2859

**By 17.00hrs, Friday 5 June 2009.**

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<sup>1</sup> See [www.forestry.gov.uk/england-openhabitats-consultation](http://www.forestry.gov.uk/england-openhabitats-consultation) for a copy.