

## Forestry Commission Open Habitats Restoration

Consultation Response: England's Northwest Regional Advisory Committee

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### Name & Contact details

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This response is to the consultation on restoring and expanding open habitats from woods and forests in England that was launched on 12 March 2009 by the Forestry Commission which ends on 5 June 2009. It was developed through discussions with the NW RFF as there is naturally some common ground however the Framework Steering Group is submitting a separate response.

### The nature of the change

*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?*

While the landscape and biodiversity benefits of open habitat restoration are recognised by stakeholders in the Northwest and it is acknowledged that the quality of woodland areas is every bit as important as extent of woodland cover, the RAC has a long-stated strategic aim of extending woodland cover. In addition, the important carbon contribution from woodland, issues of public acceptability, long-term management and the confidence of the timber mean that a consensus view for the RAC would be to set the level of habitat restoration towards the lower levels outlined in the Forestry Commission's evidence papers e.g. 500ha per year. This would mean intervention can be targeted at the most valuable habitats and so that compensatory planting can be achieved to ensure that the region suffers no net loss in woodland cover or carbon store. There is agreement over the kind of woodlands that should be targeted, i.e. lowland plantation forests that have limited value in terms of biodiversity or public amenity.

### Desired outcomes

*2. Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?*

The list of desired outcomes is helpful and encompasses all of the main points raised by our stakeholders. Particular mentions have been made regarding the financial viability of any restoration programme, given previous clearances within our region that have had inadequate management regimes in place and which have reverted to low-quality woodland as a result. The climate change implications of the policy have also been raised by stakeholders and so it is helpful to see carbon balance in the outcomes list.

### Measuring the success of the policy

*3. Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?*

The indicator set is reasonable and helpful but somewhat under-developed. From a regional perspective it is possible that some of the policy indicators might carry more weight than others given our regional strategic priorities. The Northwest has put a low carbon economy as its primary objective and so impacts on carbon stores and carbon emissions could be

seen as a key indicator for the region, so the a comment on the proposed indicators might be their relative weighting during the policy evaluation process.

In addition, the landscape ecology approach is helpful but generalized indicators should not be allowed to drive the monitoring process. For example, greater connectivity in the landscape may inadvertently lead to pathogen or alien species spread so should not be assumed to be always a desired outcome. Any such indicator on patch size and connectivity must be species or habitat specific and take the wider landscape into consideration.

The Landscape indicators avoid mentioning landscape character and quantitative components of this e.g. scale of existing wooded landscape.

The History outcome is oddly worded – what will need to be interpreted is that the landscape change results from a decision to favour the species complement of one particular managed landscape over another. There may be a better indicator than simply number of interpretation projects e.g. number of schools/ people visiting the interpreted site.

### **Policy proposals - elements present in the policy**

#### **We will treat woodland and open habitats as potentially mutually beneficial**

*4. 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?*

Yes, and this should be high in the 'mix' as the policy is rolled out to avoid overdue public/stakeholder concern that such a programme of restoration will involve the blanket removal of woodland areas.

#### **A presumption against removal of 'mature native woodland'**

*5. Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?*

Absolutely. Where support has been voiced for this policy amongst our stakeholders it has assumed that the target for removal would be 'ill-thought' coniferous forestry plantations, possibly from the latter half of the 20th Century and there would be little support, if not outright objections, to a programme that saw the removal of mature native woodland, particularly given the Northwest's low level of woodland coverage.

*6. What do you think of our proposed outline definition of 'mature native woodland'?*

The use of 80 years is arbitrary but recognises the greater value of older stands for biodiversity. Where a site has been identified as AWS however, this should take precedent over tree age or stand condition. Likewise, there should be clarification on regional native-ness of particular tree species – how far is this considered? Also relevant to the Northwest situation is the particular value of more mature conifer stands for the red squirrel population – the policy needs to enable local decisions to be taken.

#### **We will expect practitioners to help local users to participate in development of the initial proposals**

*7. Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?*

Local participation and engagement should be a priority in all areas of policy, not just the restoration of open habitats: this aspect of the proposed policy is critical, particularly if the programme is not to be met by widespread public condemnation.

While the public tends to value natural open spaces every bit as much as woodland landscapes there is an acknowledged risk of a public 'backlash' as a result of woodland removal in favour of open habitats, particularly where these areas of woodland are used for recreation or where they 'screen off' less appealing landscapes such as roads or industry. The Forestry Commission has noted that in the Environmental Impact Assessments for eleven recent open habitat restoration schemes, four met with significant levels of local protest at the planned deforestation.

The specific concerns raised by the public included a general objection to the loss of woodland and more specifically: reduction in screening of road noise, landscape change, reduction in carbon sequestration, impact on recreation and fears about housing development. These concerns could be addressed if those carrying out any restoration project undertook extensive stakeholder engagement and more broadly if the wider open habitats policy included an overarching commitment to local engagement.

In terms of engaging local users in the application of any restoration policy, at the regional level it is highly likely that this would be a 'site specific' issue depending on the woodland area, its ownership and its location. In some areas the lead could be taken by the Forestry Commission itself while in other areas local authorities, or perhaps our community forests, would be the best facilitators of community engagement. Where possible, the community dialogue should aim to cover the range of stakeholders in the area and be informed by views of social, economic and environmental experts. Focus groups, questionnaires, the web and canvassing opinion on site can all be used.

### **We will promote mechanisms for prioritising woodland removal at a regional level**

*8. Do you agree that prioritisation at a regional level is appropriate for this policy?*

Yes. There are mechanisms in place at the regional level to help guide this policy and its implementation, including a regional policy context (e.g. new integrated regional strategy and regional forestry framework) and regional leadership groups (e.g. the Forestry Commission RACs, Forestry Framework Steering Groups and regional Sustainable Development Groups). At a regional level it would be possible for a coherent view to be taken if a minimum policy of 'no net loss' were pursued and if the aspiration were for a carbon balance to be maintained.

### **We will apply a framework for evaluation to projects**

*9. Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?*

If this framework is based around the indicator set proposed in the consultation document, and if help were given around the weighting given to differing indicators, then it is a useful framework for decision making and should be applied. As any habitat restoration programme is highly likely to be dependent on public funding to be taken forward then it seems appropriate for the framework's application to be based around the funding decision for any individual project.

*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?*

This possibly depends on the resources available to the practitioners involved but written guidance on how to take a balanced view e.g. balanced score card - PBRs approach, possibly backed up with training if required, should be sufficient. Where there are more complex technical questions involved (e.g. carbon storage in woodland vs. restored peatland areas) then there may be a need for additional guidance and support for practitioners.

### **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.**

*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?*

A threshold level of woodland removal will be critical if national (as well as regional) commitments to sustain and where possible expand woodland cover are to be met. This threshold must not be wrongly interpreted as a target for woodland removal. One issue raised by stakeholders in the Northwest is pertinent however. The threshold proposal simply places clearance for open habitats restoration against year-on-year expansion of woodland cover under the assumption that this is the only driver for reduced woodland cover, which may not be the case. Recent years have seen a dramatic drop in new planting levels and discussions are ongoing as to whether we have the monitoring mechanisms in place to give a true and genuine picture of actual woodland coverage levels across England. These two issues suggest that open habitats creation vs. year-on-year woodland expansion may not be a zero-sum scenario.

With regard to an application mechanism, a regional as well as a national overview of the threshold would be helpful as at the regional level there are mechanisms and partnerships in place to ensure that the threshold is not exceeded. On a project-by-project basis it may be more complicated to apply a threshold particularly if compensatory planting is required, as some voluntary groups or NGOs may acquire a potential open habitat site but not have the lands or the funds to carry out compensatory planting, here a broader focus at the regional or sub-regional level may be more appropriate.

12. Do you consider that the proposed threshold is about right, too high or too low?

Given the comments above about reduced planting levels then the proposed threshold may well be too high and it may be advisable to set a threshold level closer to the current level of open habitat restoration (500 ha per year).

The importance of working hard to avoid net deforestation should be restated here. Although conservation-focused stakeholders have urged to restrain from over-fixation on woodland cover levels per se (rightly reminding us of the quality not quantity rationale) there is a strong policy context for promoting woodland *expansion*, not just stasis.

The Agenda for Growth for example is the region's strategic framework for forestry and it explicitly recognises that with levels of woodland cover lower than the UK and European average, the Northwest should pursue a policy of 'sensitive' woodland creation and management, particularly where it helps to connect isolated areas of existing natural or semi-natural woodland. The Framework also proposes continued work to create greenspace - woodland - that improves the image of the region, specifically in areas of social need, on derelict and brownfield land and along key gateways and transport arteries. While these may not be the areas of woodland targeted, to avoid net deforestation efforts in these areas will need to be redoubled if we have to compensate for woodland removal.

More generally there is widespread support amongst environmentalists and the public alike for an increase in woodland cover. England has one of the lowest levels of woodland cover in Europe (9% versus a European average of 46%) and England's Northwest has even lower levels of cover, at 6.8% of land or just over 96,000 hectares. As a result there is widespread support for an expansion in woodland cover in England, as evidenced in a recent survey of the public by the Forestry Commission (2007) which found that more than 70% of the public supported increased levels of woodland creation. In addition, any woodland removal in an area of low woodland cover like the Northwest will have a greater impact than in a more wooded region.

If open habitat restoration targets are set towards the higher, more ambitious end of the proposed spectrum then there would be net deforestation suffered across England, which would be counter to both the policy context and public opinion.

This scenario of woodland loss is important if consideration is given to recent, year-on-year reductions in new planting levels referenced above. In the year to March 2008 levels of new planting dropped to just 7,000 hectares, down from 10,000 in 2007 and 18,000 hectares in 2006.

## Key variables

### What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?

*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?*

The biodiversity objectives will only be met if maintenance is sufficiently resourced. Recent restoration projects have suffered from inadequate maintenance regimes hence we should not embark on clearance programmes without being completely certain that long term management is in place, as we risk clearing woodland cover only to have their quality decline and could even see tree species such as birch or bracken return.

*14. 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?*

Yes. Any 'carbon sensitive' process should monitor, minimise and where necessary offset its carbon emissions to help the UK achieve the ambitious, world-leading targets set out in the recent climate change bill passed by Parliament. There are a number of carbon footprinting and management tools that could be utilised to achieve this.

*15. Do you agree that it is appropriate to include impact on long-term average carbon store and loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?*

Yes. Absolutely. At a regional level the Northwest is strategically committed to being a lead region on tackling climate change and so any reduction in our long-term carbon store would be counter to our current policy environment; it would also meet with significant levels of opposition from those working hard to combat climate change. The region has also recently embarked on a promotional programme to encourage the use of timber as a low carbon resource of first choice (a programme called Form>Wood) and so the utilisation of timber as a low carbon product is also a regional priority. There is also a regional biomass strategy and working group which would strongly endorse the consideration of woodfuel within any carbon balance consideration.

The Northwest region has the potential to increase, not decrease, its carbon store in woodlands if the recent decline in planting is reversed.

*16. 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?*

In 2008 the UK led the world by publishing the first national Climate Change Act which committed the UK to achieving a cut of 80% in carbon emissions by 2050, set against a baseline of 1990. It also set out plans for the first ever 'carbon budgets' which will be set each year to keep the UK on a trajectory to meeting its planned target. As a result the carbon implications of all areas of policy or public sector activity will be carefully scrutinised in the future.

As the evidence papers published by Forestry Commission make clear, in terms of adapting to climate change, the move to restore open habitats, if handled carefully, could be positive as a mosaic of more diverse habitats could help species to adapt to a changing climate, particularly if those habitats are less isolated, allowing species to migrate more conveniently in response to a shift in climate.

Conversely open habitat restoration could have significant negative implications in terms of the UK's performance in reducing and managing carbon emissions. One of the positive aspects of the mass-afforestation programme carried out during the 20th Century was that it created a significant carbon 'sink' of 3.32 million tonnes of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) since 1922. If the higher level goal of open habitat restoration was pursued this would result in a 7% loss of this woodland cover, bringing with it a .23 million tonne CO<sub>2</sub>e loss in sequestered

carbon. If the carbon emissions associated with deforestation are added this climbs to 0.53 million tonnes CO<sub>2</sub>e per year. Under Article 3.3. of the Kyoto protocol emissions or removals due to afforestation, reforestation and deforestation have to be reported, so this outcome would be significant given that the UK's current submissions under 3.3 are running at 1.7 million tonnes sequestered in 2006. In short we could put a very large dent in this part of the UK's CO<sub>2</sub>e reporting.

The direct impact on the UK's carbon balance would be similarly dramatic. The removal of woodland areas would result in a direct removal of a long-term store of 168 tonnes CO<sub>2</sub>e per hectare, on average. If you factor in the use of timber products from these area as a carbon neutral fuel source or product, this adds another 289 tonnes CO<sub>2</sub>e per hectare over 100 years. In total, woodland removal to open habitat would result in a net direct impact of 457 tonnes CO<sub>2</sub>e per hectare. For a higher level target of 30,000 hectares of open habitat restored, this would commit forestry in England to a release of some 13 million tonnes CO<sub>2</sub>e.

As some of the open habitats being targeted are on peatland soils there might be some expectation of these habitats sequestering higher levels of carbon once restored, but once the carbon impact of deforestation has been factored in, alongside releases from peatlands of methane, there is no net gain in CO<sub>2</sub> sequestration.

At a regional level the above implications are of vital importance given the Northwest's commitment to be a leading region on climate change. Our current Regional Economic Strategy and the consultation papers around a new, Integrated Regional Strategy (RS2010), place the transition to a low carbon economy and significant curbs on greenhouse gas emissions as primary strategic objectives. In consequence, a policy of open habitat restoration which led to significant emissions of CO<sub>2</sub>e would work against regional policy and strategy at the very highest level.

In short, biodiversity outcomes are of importance, but the region views tackling climate change as a primary objective.

**Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?**

*17. 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?*

We favour the dynamic approach here, particularly given comments from partners around difficulties with maintenance regimes and the possibility that a dynamic approach could ensure that some element of productive woodland were retained across restored sites. There needs to be a balanced, socio economic and environmental approach.

*18. 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?*

The favourable condition criterion is too limiting and for all habitats is not backed up by sound science. It also precludes the recognition of contemporary, resilient habitats and ecosystems which arise from the specific site history; it cannot always be correct to re-create an historic ecosystem?

**What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?**

*19. Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?*

No additional information to supplement that given by both EFIP and ConFor. From a regional perspective the one point to note here is that the processing industries that rely on long-term timber flows do account for a small but important sector of the region's economy and in specific locations, particularly to the North of the region, they are important employers

whose confidence and long-term viability is of high importance. These businesses have voiced a genuine concern around these proposals and we would do well to take their concerns on board.

With new planting levels currently falling and with heavy focus on planting broadleaved rather than coniferous woodland there is significant concern within the timber industry that we will see a 'peak' in wood supply (particularly softwood) around 2020 with an increased reliance thereafter on timber imports. For timber industry representatives the additional removal of plantation forest under a move towards open habitats would lead to a reduced domestic timber resource and, as a result, a loss in jobs and business. This is an issue that has been discussed at regional fora and which is of concern to our stakeholders.

The levels of reduction of softwood supply do not at first glance appear significant. Under the higher level of removal (up to 30,000 hectares) the reduction in resource would be 6% set against 1% for the lower scenario. This higher level of deforestation would, it is estimated, equate to a loss of £18 million per year or 1,500 jobs. While these are not large figures at the national level, they could impact on the confidence of the industry, particularly when it comes to key investment decisions.

The confidence of the forestry sector is of importance to the Northwest, where the wider sector generates around £435 million GVA each year and employs almost 70,000 people. It is for this reason that industry body ConFor has called for no net loss in productive forest area as a result of a policy around open habitat restoration. This is a call that we would support even though our sector in the Northwest is focused on processing as a priority, rather than timber production.

### **Different approaches to applying policy**

*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?*

Given comments from stakeholders, particularly those engaged in the timber industry, land management, community forestry and climate change, the tendency would be towards the first policy approach 'Making sure that land can be managed in the long term'. If a higher level of woodland removal were introduced, under policy scenarios two or three, then a level of compensatory planting would be welcomed.

Also welcome would be a recognition that scenarios two and three could be more relevant at the local, sub-regional or regional scale, rather than a 'top-down' approach. The Northwest has a long tradition of practical and productive partnership work in this area which makes implementation of policy easier if conducted partly through regional mechanisms.

A balanced scorecard approach could be taken as long as the quantification of benefits could be at a regional level.

### **The role of compensatory planting**

*21. What is the appropriate role of compensatory planting in this policy?*

While compensatory planting would be helpful to assuage a number of concerns, including long-term carbon stores and productive timber flows, it is fair to recognise that this would represent an additional cost to government. If a 'no net loss' approach were to be taken with regard to carbon, timber and woodland cover, it could be that this could be assessed not on a site-by-site basis but through regional or sub-regional partnerships. This would help to ensure that the philosophy of the 'right tree in the right place' was adhered to, it would build on regional research work on where the greatest public benefit could be realised and it would release individual practitioners (a Wildlife Trust for example) from an additional burden of woodland creation as they seek to restore an important open habitat.

Targeted (via PBRs) compensatory planting must be the way not just create replacement woodlands of similar ha but locate new woods where they can deliver greatest functional benefits!

### **Factors to consider when deciding which policy is likely to work best**

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?*

No.

### **Implications for delivery mechanisms**

23. *Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?*

The principal implication is the direct financial burden of the policy at a time of constrained public spending. The policy of restoration to open habitat must deliver a quality habitat, not just a tree-less habitat and it should be affordable.

### **Other comments**

*We welcome your input on any other aspect of this consultation.*

Only one other piece of context is relevant. At a recent Natural England event a workshop was held to explore the open habitats proposals and it was suggested that a (very) long term view of our landscape history might be helpful. An important point of context is that many of the open habitats to which we would return are themselves the result of human intervention:

“By the time humans arrived in significant numbers, during the Mesolithic period, much of the landscape was heavily wooded, except in the highest fells and on the nascent peat mosses. The species composition varied depending on drainage, exposure and the soil parent material: oak predominated on freer draining slopes; ash on limestone; alder on wetter ground in the valleys and on the lowlands. The first major environmental consequence of human activity was woodland clearance, either through deliberate removal or as a result of grazing livestock preventing regeneration.”

*Angus Winchester, England's Landscape: The North West  
English Heritage, 2006*