

## **Consultation on Restoring and expanding open habitats from woods and forests in England**

### **Peak District National Park, Ecology team comments (in note form)**

#### **Page 12**

4.1 The Nature of Change – This section mentions woodland that might be removed will tend to be non-native conifers or relatively young mainly native woodland planted or grown on former open habitat during the 20<sup>th</sup> century. Some native regeneration will have biodiversity value and removal may be inappropriate. Some non-native conifer plantations may have ecological interest, such as being important for nesting birds (e.g. goshawk and crossbill). There is a need to consider ecological interest of any woodland before removal. The removal of non-native broadleaves does not seem to have been covered (e.g. poplar plantations). This needs to be included in the document. In addition, there is a need to consider the removal of native woodland where species have been used that are inappropriate to the locality.

Q1 – Removal at the higher end of the scale should be considered to help meet the HAP targets. Targets above the HAP threshold have not been considered, ideally this should be the minimum target. Woodland to be felled should not have a negative impact on biodiversity, but should have a net gain. Adequate site assessment is needed to ensure that there is no impact on protected species or other species of conservation importance.

#### **Page 14**

Avoiding net deforestation - Surely it is more useful to gain open habitat in good condition, removing inappropriate habitat and then increase woodland planting in appropriate places elsewhere.

#### **Page 15**

Climate change – Restoring open habitat will help strengthen some ecological communities reducing fragility by ensuring connectivity and wider utilisation of their particular niche.

Climate change and carbon balance – see comments below (comments for page 29).

#### **Page 16**

Natural Environment – mentions there will be little impact on landscape – could have a positive impact on landscape especially when targeting inappropriately planted woodland. Mentions this in comments but not in likely impact.

Need to assess what wildlife is present – could have a negative impact if not surveyed correctly or impacts on species of nature conservation importance.

## **Page 17**

Wet woodland is a UK and in some areas local BAP habitat. This habitat should only be removed when planting is inappropriate or compromising the biodiversity value for the site. This is recognised later on in the document.

Quality of life – mentions in the comments that there can be a positive impact, but does not show this in the likely impact section.

Business and markets – in some cases it has been uneconomical to harvest the timber anyway, so in these cases there would be little impact. Economic viability of the sites needs to be considered in the costings. Some of these elements are considered later on in the document.

## **Page 19**

Financial viability – surely most of these woodlands will be under some form of grant, under eWGS or previous schemes (the extent of grant funding may vary esp. when considering coniferous woodlands, but it is still likely that they are grant funded in some way i.e. woodland management plans). Therefore, it would just be a case of moving funding from one public funding stream to another, moving from eWGS to ELS/HLS.

Keeping to governments commitments on woodland cover – need to ensure that targets are met by increasing woodland planting in appropriate places elsewhere rather than reducing inappropriate woodland removal.

Woodland biodiversity – may be worth extending this to local BAP species and other species of nature conservation importance (e.g. nationally scarce etc.) that may not be included in those listed in section 41 of the NERC 2006 list.

## **Page 20**

Ecological community indicators – could include local BAP as well, although this may be more difficult and take up more resources.

Financial viability – should also look at % of woods removed that had eWGS or previous grants attached to them.

## **Page 21**

Woodland biodiversity – need to know whether woodland has had an appropriate assessment for ecological value. It should have done if the policy has been followed correctly. This indicator may not have resulted in a biodiversity loss. May need some rethinking.

## **Page 22**

Elements present in the policy – 1- depends what type of woodland you are considering. Some habitats will be more beneficial than others (ie. Spruce plantation and remnant blanket bog habitat would not be considered as having the same benefits).

2 – presumption against removal, but should be ensuring that native species in appropriate locations are present or encouraged.

6 – should again look at creating more woodland in appropriate places to compensate for this rather than limiting the scope for habitat restoration.

### **Page 23**

Q5 – agree no removal of ancient woodland. Other mature native may be on case by case depending what species are associated with that woodland, net gains for biodiversity when restoring to open habitat and whether the planting is appropriate (correct species in the correct place). Also need to consider phased works to reduce the impact on ecological interest.

### **Page 25**

Q8 – If prioritisation is at regional level, need to ensure that there is proper liaison with organisations at area level, such as national parks and councils.

### **Page 27**

Q9 – option 4 is preferred. Fig. 2 seems appropriate, but need to ensure feedback.

Q10 – There is a need for thorough guidelines produced nationally and at a regional/area level.

### **Page 28**

Q11 and 12 – Does sound like the desired threshold is too low and could hamper BAP targets. It would be worth reviewing losses and gains of woodland according to national inventory reporting and adjust the threshold rate of removal accordingly. This could be done in combination with compensatory woodland planting to ensure no net loss, providing that the planting is carried out in appropriate places and with species that are of local provenance.

### **Page 29**

Key variables – some habitats will create a net increase in carbon storage compared to woodlands. Annex 6 identifies c.5000ha of land that could be restored to blanket bog, c.500ha lowland raised bog, c.600 ha fens. Their ability to sequester carbon should be taken into account in any figures produced.

Q13 – Will be case by case with many variables to consider.

### **Page 30**

Q14 – Agree in principle, but will depend on what type of habitat you are trying to create. These options should be available, but their relevance will be case by case.

Q15 – if including these figures must also consider figures associated with restored carbon sequestering habitats such as blanket bog. Must also consider that some areas may be restored back into more appropriate woodland habitats (for example, coniferous to clough woodland or broadleaf where appropriate).

#### **Page 31**

Q16 – There should be room to achieve both aims through encouraging removal of inappropriate planting, habitat restoration which will have some carbon storage associated with it and appropriate compensatory planting to offset the net loss or potentially have a net gain.

#### **Page 34**

Q17 – This depends on a number of factors including what species should be allowed to regenerate (should be native), what the management objectives are on the site. This would need to be considered on a case by case basis. Agree in principle, but detailed guidance would be needed to ensure that biodiversity aims were still met.

Q18 – Only agree for SSSI's where development of native woodland of local provenance has a net gain for biodiversity without negative impacts.

#### **Page 39**

Q20 - support statement 6.3.2, but there is again a need to emphasise compensatory planting as a preferred option to reducing the removal of inappropriate planting. Elements of 6.3.1 also required to ensure that there is enough funding available to restore the quantity of open habitat that is put forward. As there is a limited budget, prioritisation is vital, but needs to be thought out carefully. There may be a need to move some funding from FC grants to HLS so that more money can be made available. Should NE and FC be asking for more grant funding to be made available. It seems that we are asking more and more from HLS which has a fixed budget. More money needs to be made available.

#### **Page 40**

Q21 – There is a need to consider planting that is in appropriate areas – this may mean that it is away from the habitat restoration works. New planting should be native and of local provenance. Woodland expansion/compensation could be covered under existing FC woodland schemes and projects throughout the UK e.g. woodland birds project in Peak District National Park.

#### **Page 41**

Woodland biodiversity – avoiding loss of mature native woodland – see comments above.

#### **Page 42**

Careful consideration must be given as HLS may not be the only funding mechanism in some cases. Could read – consider availability of HLS and other funding mechanisms.