

# 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>	Ken Smith
<b>Your organisation (if any):</b>	Association of Local Government Archaeological Officers: England (ALGAO: England)
<b>Date:</b>	5 June 2009

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?
ALGAO per se has no aspiration for the scale of the proposed policy. However, it would be prudent to pursue a target that would avoid nett deforestation, which would mean a target maximum of 1,100ha per annum (as per Table 2), assuming that no measures such as comensatory planting are deployed. In the event of such measures being adopted, then this figure should be reviewed against a range of issues, including economic impact and the likely cost of that and any other planting schemes.	
<b>Desired outcomes</b>	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
ALGAO is convinced that there should be an additional desired outcome, that any restoration/expansion projects should not compromise the historic environment content of any woodlands and that this content should be used to maximise the learning potential of any such project.	
ALGAO acknowledges that the consultation is to do with restoring and expanding open habitats from woods and forests. However, we would suggest that, while issues such as sustainability, climate change, natural environment (not surprisingly!), quality of life and business and markets are given appropriate prominence, the historic environment, in comparison, is given relatively short shrift. In Table 4, for example, the third ETWF theme heading should be expanded to reflect that in the ETWF - Land and Natural Environment - so that the second of the three bullet-pointed objectives in that Theme can be addressed.	

No	Question.
	<p>It needs to be acknowledged within the product of this consultation that woods and forests contain significant evidence of past human activity. Sometimes these activities were associated with the management of those woodlands, sometimes with activities that took place prior to the woodland being established. Significant opportunities will be presented, as a result, for '...safeguarding, enhancing and celebrating the characteristic elements of rural and urban landscapes and their cultural and historic values' (ETWF, page 23). However, unless these opportunity are enabled by specific mention within the outcomes of this consultation, they will be missed.</p> <p>This leads on to the two factors addressed on page 16 of the consultation. Learning about landscape history is assessed as 'Little impact'. We would suggest that, if the process of restoring or expanding open habitat is done properly, then recourse will have to be made to datasets such as historic landscape characterisation (HLC), landscape character assesement (LCA), aerial photographs (APs) and historic maps (for map regression analysis as part of any landscape impact assessment). While any evaluation process will necessarily need to be commensurate with the size of the area to be opened up, even small areas can include features of archaeological or nature conservation importance or which may have a significant landscape impact; they all deserve an appropriate level of assessment.</p> <p>Whether or not any restoration or expansion goes ahead, the information generated by such an exercise should provide a significant resource for enhancing learning about woodlands and their role in the development of landscape, both generally and specifically. If such restoration or expansion is in keeping with landscape character, that is one story; if an informed decision is made to change the acknowledged landscape character, then there is an even more important story to tell, to enable people to learn, understand and acknowledge the claimed benefits of such landscape change.</p> <p>It is essential to ensure that well-intentioned management changes do not result in unforeseen damage to historic environment features or habitat. Once cleared, most sites will need medium- to long-term commitment to regular management to control re-growth. Management that relies on an infrequent 'blitz' could encourage inappropriate, invasive species. Grazing will be the best solution in grassland restoration but not necessarily for heath. This may then lead to animal welfare needs such as water troughs and supply pipes or boreholes for abstraction which in turn impact physically on the landscape, on biodiversity and historic environment interests and their settings. Occasionally, sites adjacent to byways open to all traffic or roads used as public paths (BOATs or RUPPs) can become vulnerable because the barrier of trees that made them inaccessible has been removed and earthwork banks are seen as an 'off road' challenge to 4x4 vehicles.</p> <p>The acknowledgement of the potential for both positive and negative impacts on historic environment features as a result of these proposals, is welcomed. We are aware that the Forstry Commission has its own guidelines for dealing with historic environment issues within woodlands and that these are currently under review. However, it is suggested that these proposals offer a significant opportunity to develop a much closer working relationship between the Commission and local authority historic environment services. In addition to the already acknowledged benefits, such a partnership would add that of safeguarding the historic environment resource through the pursuit of these open space objectives.</p> <p>Local authority services are where the Historic Environment Record (HER) for any given area is held, as well as other pertinent datasets such as HLC, historic maps and APs (as noted above). Staff of these services are able to offer information and advice as to the most appropriate ways of safeguarding the recognised historic interests held within woodlands as well as what additional works might be needed in order more-fully to inform the decision-making process.</p>

No	Question.
	<p>Local authority historic environment services are significant repositories of data, in their HERs and more importantly HLC, that is ideal for informing this policy. We consider that we have shared objectives at a landscape level and this policy and its implementation offers a significant opportunity for partnership working both to express them and to deliver against them.</p>
<p><b>Measuring the success of the policy</b></p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
<p>It then follows the response to Q2 above that there should be an historic environment indicator for evaluation. This could relate to the objectives contained within the Land and Natural Environment section of the ETWF, for example, 'characteristic elements of cultural and historic values safeguarded enhanced and celebrated'. Indicators could be historic environment content identified and safeguarded; historic environment content identified and enhanced; historic environment content utilised in learning opportunities relating to this open space restoration/expansion, or something similar. ALGAO would welcome further discussion on how such an indicator might be developed and implemented in partnership with local authority historic environment services.</p> <p>At a more-strategic level, consideration needs to be given to how the proposed policy and its associated initiatives will dovetail with and complement other environmental land management initiatives such as Higher Level Stewardship and local authority Landscape Character Assessments. This policy needs to be supported and reciprocated by the underpinning policy objectives of the stakeholders who will be helping to deliver it, including local authorities, in order that mutually acceptable long-term landscape objectives can be achieved. To this end, as well as periodic maintenance/management inputs, there should be a facility for review of the initiative at intervals in order to assess whether or not it is achieving its particular objectives and what, if any, intervention is required.</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>ALGAO agrees that these elements are potentially mutually beneficial and that promoting this concept will be helpful for gaining support for such proposals. While accepting the bullet-pointed issues noted as positives in the consultation document, it is also a case that targeted open spaces would be of significant value to historic environment elements. Many plantations (e.g. Thetford Forest) were simply imposed upon the existing landscape, which can survive very well-preserved but unseen within woodland. Advance surveys in Thetford Forest, for example, have resulted in the recognition of many previously unknown Bronze Age barrows, field systems and medieval warren banks. The need for evaluation, by whatever appropriate methodologies, of potential areas of enhanced open space needs to be recognised, in order that the historic environment</p>	

No	Question.
	component can be taken into account in developing and implementing the policy, to avoid unwitting damage occurring to that component as a result of the works necessary to restore or expand open habitats.
<b>A presumption against removal of 'mature native woodland'</b>	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
	Qualified support for this suggestion. If, as ALGAO hopes, the historic environment is taken more explicitly into account through this policy and its implementation, then some significant features, such as hillforts or landscape scale elements such as field systems, would benefit as a result. There will doubtless be occasions when, under such circumstances, mature trees would need to be removed at best, or reduced significantly at worst (from an archaeological perspective) to achieve such benefits. There may be similar instances from a biodiversity perspective also where removal of mature trees could be seen as beneficial. There should be sufficient flexibility in any such principle to enable this to happen, after due process of appropriate consultation with relevant interests. The reference to exceptional circumstances at the end of Section 6.1.2 on page 24 of the consultation is therefore welcomed and every effort should be made to retain it in any developed policy document.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	No opinion.
<b>We will expect practitioners to help local users to participate in development of the initial proposals</b>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
	Agreed. The preferred option should be contact and consultation as early in the process as possible and such consultation should be as fully informed as possible, with appropriate information about landscape, biodiversity and historic environment content, impacts - both positive and negative - and perceived outcomes. Early consultation avoids consultees fearing they are being presented with a 'done deal' if consultation takes place later in the development of the proposal, and should occur before those developing the proposals become too wedded to their own initiative, in order that they can properly consider, adopt, adapt, improve or reject consultees' suggestions. While this might be more expensive - not least in time - it is more consistent with current government guidelines for planning applications, for most elements to be resolved as part of pre-application consultation, so that when submitted an application can be processed relatively speedily. This does of course mean that one of the consultees in such circumstances would have to be the Forestry Commission.
<b>We will promote mechanisms for prioritising woodland removal at a regional level</b>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
	Agree. Such a proposal would reflect positively the regional establishment of organisations such as NE and English Heritage and the regional delivery of Environmental Stewardship. It should also reflect the burgeoning development of regional landscape

No	Question.
	<p>character assessment (LCA) which would be important for assessing landscape impact, not least because LCA at a local authority level does not at present have comprehensive coverage. In addition, prioritisation enables some of the difficulties that could arise from landscape not respecting administrative boundaries to be overcome.</p> <p>Regional prioritisation could enable economies of scale to be introduced, for example, targeting groups of HLS agreement holders to achieve a wider impact than might otherwise be possible.</p>
<b>We will apply a framework for evaluation to projects</b>	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?
	<p>The proposed framework for evaluation appears attractive at first glance but the trouble with a linear evaluation is that, on completion, it appears that the job has been done, whereas this is almost always never the case. There will always, for example, be a need for management or other interventions to maintain the open spaces that have been created. There is therefore a need for constant rounds of evaluation. The model should therefore be circular (there are plenty of examples of progressive circular processes of initial consideration, development, implementation, assessment, further consideration and so on. Graphically represented, they reflect the reality of something that is considered to have a long-term future.</p> <p>It is suggested that it would be better not to start with 'The problem'; either start with 'Desired outcomes' or perhaps better 'Issues' - which would lend itself more to the progressive circular model of evaluation. Similarly 'Did it work' might be better replaced with 'Assessment' which would then run into the suggested 'Issues' and the cycle starts over again.</p> <p>ALGAO considers that the historic environment should be included as part of the evaluation process. At present, as part of the evaluation process in the delivery of HLS and the Energy Crop Scheme, local authority historic environment services are consulted so that the information contained within their HERs can be used, to obtain best value from and for these schemes. It is strongly recommended that the Forestry Commission should consider introducing such a facility, to inform delivery of this initiative, to maximise delivery across the board - biodiversity, landscape and historic environment. Such a process would enable known features to be identified but also allow areas of high archaeological potential to be flagged up where further survey or other appropriate work, as part of the process of identifying the most-appropriate areas of open space, might be most beneficial.</p>
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>We suggest that use of an evaluation process - as part of the process of safeguarding the investment of public funds - should be a condition of grant (Option 2). It would have to be accompanied by the imposition of a timetable for such evaluation, which means monitoring but the impact of such work would in part be dependent on the timetabling. It could be quinquennial or decennial; anything longer than 10 years we consider to be too long.</p>
<b>To avoid net deforestation in England we will try not to go over a threshold rate</b>	

No	Question.
<b>of woodland removal due to restoring and expanding open habitats.</b>	
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?
Not really our area of expertise but the 'netting off' option seems the most straightforward (which doubtless means there are issues surrounding it!).	
12.	Do you consider that the proposed threshold is about right, too high or too low?
If the calculations are correct then the threshold should be appropriate.	
<b>Key variables</b>	
<b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b>	
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?
No opinion.	
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?
Agree that management practices to minimise carbon emissions during works should be adopted. Agree with the proposed management practices, not least because the first, third and fourth bullet points would also be beneficial for the long-term management of the historic environment resource. ALGAO would support the removal of trees when they are economically mature so long as the associated access, felling and removal were done according to appropriate guidelines, to minimise impact on the historic environment component. It is recommended that in areas where such activities are proposed, then, in the event of insufficient or inadequate information being available, appropriate work should be undertaken to establish the nature, extent and preservation of any historic environment interest and that understanding then used to inform the optimum ways in which timber is extracted, with minimum impact on those identified elements.	
15.	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?
ALGAO believes that this course of action is appropriate.	
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?
Not really ALGAO's area of strength but one way forward might be through looking to justify restoring or expanding open habitats where such work would benefit Red Databook species, would benefit improving the condition of SSSIs or would benefit endangered	

No	Question.
	<p>species or habitats recognised in Local BAPs.</p> <p>In addition, if the approach to achieving more open habitats was more-explicitly multi-disciplinary, then inclusion of historic environment elements would provide a further suite of reasons for balancing loss of trees and reduced carbon uptake against the other benefits that would accrue from implementing this open habitats policy.</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>We leave our ecological colleagues to respond in detail to this question. However, the concept of shifting mosaics of woodland, and repeated cycles of felling, removal and all the associated works with potential for ground disturbance, are much more likely to have a far greater damaging impact on any historic environment interests than one cycle of removal followed by ongoing management as open space.</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></p>	
<p><b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b></p>	
19.	<p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>
<p>No</p>	
<p><b>Different approaches to applying policy</b></p>	
20.	<p>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>
<p>The third option appears to be the most appropriate, as long as each set of proposals is subject to consultation with key stakeholders and other interested parties, including historic environment.</p>	
<p><b>The role of compensatory planting</b></p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
<p>Compensatory planting should perhaps be an option, with a declaration in any open habitats scheme that proposals brought forward that include compensatory planting will be looked on more favourably than those without. It should be a condition of any such compensatory planting that the areas identified for such planting should be afforded the same level of scrutiny as any new planting proposals, to avoid negative impacts on</p>	

No	Question.
	biodiversity, historic environment and landscape interests.
<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>ALGAO welcomes the inclusion of historic environment in the 'Good practice' list in Table 6. In that context it is entirely appropriate. We would suggest however that one additional question that should be asked is about additionality. Does the policy encourage and recognise additional benefits that would or could accrue as a result of expanding open habitats? Obvious additionality could be provided by ensuring that historic environment elements were being offered more-sustainable management as a result. Equally, delivering against a Landscape Character Assessment Action Plan would also generate benefits additional to those provided by a purely biodiversity driven policy.</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>There are some 20,000 Scheduled Monuments (SMs) across England. These are nationally important monuments protected, under the Ancient Monuments and Archaeological Areas Act 1979, from any action that might cause damage, without explicit written permission from the Department for Culture, Media and Sport (DCMS). Some of these SMs are up to or more than a square kilometre in extent. Conversely, in some landscapes where area scheduling hasn't been pursued, there is a proliferation of individual schedulings. Both have implications for land management of all forms. English Heritage and DCMS are the competent authorities for advising on Scheduled Monuments and ALGAO strongly recommends that this information is included in any developed policy.</p> <p>Under 'Research and evidence' we suggest that one issue that should be considered is that of additionality - as well as delivering against biodiversity requirements, to what extent does/could implementation of the open habitats policy deliver against historic environment and landscape objectives? Such research could address issues to do with the impact of tree growth on historic environment features - different types of features, different types of soils; how effective are the Commission's own historic environment guidelines in protecting historic environment interests, as they have been identified under 'Good practice' in Table 6; how does the condition of historic environment features vary/is it improved between land before it has been converted to open habitat and once that transformation has taken place?</p> <p>Provision needs to be made for bringing relevant guidance documents, other than those produced by the Forestry Commission, to the attention of those who might be implementing the open spaces policy. For example, Natural England has recently produced a research report - 'Impact of heathland restoration and recreation techniques on soil characteristics and the historical environment' (Natural England Research Report NERR010). In the particular circumstances of extending open habitats in heathland areas, this could be of significant importance.</p>
<b>Other comments</b>	
	We welcome your input on any other aspect of this consultation.

No	Question.
	<p><b>In summary, the potential benefits of restoring and expanding open habitats from former woodland needs to be assessed case by case, on an inter-disciplinary basis, informed by a thorough understanding of the historic environmental and biodiversity issues. The resource implications of providing this analysis should not be under-estimated and may need a combined approach utilising local authorities, national agencies and external consultancies to provide the appropriate level of information at the decision stage.</b></p>

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

**Please send your completed forms to:**

[Dominic Driver](#)

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**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.