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 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.

Your name:	Anon 05.06.09
Your organisation (if any):	
Date:	5 June 2009

No	Question.
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?
The extent of restoration or expansion of any open habitat restoration should be determined following the development of a sound rationale and should be based on sound social, environmental and economic criteria. I consider that it is misleading to commence a consultation on a rationale to guide decisions about restoration and expansion of habitats with a question relating to the scale of such change. The level of restoration that I feel is justified can only be that which can be matched by compensatory woodland creation; this to avoid net deforestation in England.	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
I agree that the policy outcomes are reasonable but how these are delivered must be adressed without any preconceptions. For example the first outcome 'Ecological communities able to cope with threats' - in the supporting evidence (Table 13) it is detailed that many open habitats are vulnerable to threats from climate change, a true assessment of the vulnerability of the existing woodland must also be made to determine which is most able to cope. Also the seventh outcome 'Woodland biodiversity' - as has been found in the recent research into the biodiversity of Britain's planted forests (Forestry Commission, 2003) plantations already provide habitats suitable for a very wide range of species, including forty-two Red Data List species, as these forest ecosystems develop and mature it can be expected their biodiversity will increase.	
Measuring the success of the policy	

No	Question.
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?

I do not accept that the indicators are reasonable. The assumption taken for the first outcome is that open habitats restored from forest are able to cope with threats whereas as stated above the evidence suggests otherwise, all but one of the indicators chosen (trends in UKBAP species) provide no evidence of resilience.

On financial viability the existence of HLS or other support does not indicate viability but purely that public money is being invested. In most instances heathland and wet fen were maintained as open habitat by management defined by socio-economic requirements and agricultutral practices. To continue to invest public monies to replicate these practices is unsustainable.

Engagement with local users could be much better assessed by their involvement in the EIA process rather than just where concerns are identified as an issue.

The outcome that reduction in timber production will have little impact on confidence in the harvested wood products producing and processing sectors, and economic activity in the sector is not significantly affected, is at odds with the fact that commercial (i.e. coniferous) woodland will inevitably be lost. This will act agaionst the targets set in the Forestry Commission's own Woodfuel Strategy for England.

Carbon balance must take account of carbon emmission through long-term management of open habitat and not be limited to the restoration process. Further consideration should be given to carbon savings lost by not managing those woodlands lost to open habitat restoration as a source of sustainable woodfuel.

It is disingenuous to suggest that only established native woodland has any biodiversity value, loss of any woodland will have an impact on woodland biodiversity. Much of the NVC W10 woodland lost to heathland restoration, and NVC W6 'wet' woodland lost to fen rstoration is of high biodiversity value even as successional habitat .

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?

Woodland and open habitats can frequently beneficial as a mosaic of habitat this should not of itself be used to gain support for wholesale woodland removal. Any consideration of open habitat restoration should be based on sound criteria, one of which should be the matrix of habitat types that are most suitable.

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'?

This is much too limited. There should indeed be a presumption against removal of ancient and 'mature native woodland' , however, the impression is given that any other woodland type is of lesser biodiversity value than open habitat.

No	Question.
6.	What do you think of our proposed outline definition of 'mature native woodland'?

It is inadequate. Much of the loss of open habitat occurred as a result of changes in agricultural practices post second-world war; so I would suggest that the stated criterion of 80 years be changed to one of 60 years. Also the focus on native woodland does not recognize the actual and potential biodiversity value of mature non-native woodland - in many cases it is the maturity of the woodland habitat that influences biodiversity irrespective of the actual species composition.

A definition used for EWGS Management Grant sates that a woodland consisting of 80% locally native trees and shrubs (i.e. species historically found in England that would arise naturally on the site) may be classified as semi-natural woodland. Why is this definition not used here?

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 scoping during development of proposals should always be encouraged but to suggest that there may be a single approach that should be used indicates a great lack of understanding of community engagement. The ideal would potentially encompass elements of all four of the options listed.

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?

The RFF process must be the means for the delivery of this policy. The opportunity mapping project refered to, covering the East of England and not just East Anglia, should be considered as a good approach that may be applicable elsewhere in the country, particularly as it addressed social as well as biodiversity aspects of open habitat restoration. However, these projects must first be formulated and agreed as a delivery mechanism with all interested stakeholders - there are other independently generated statements available from single interest groups.

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?

No. I suggest the current situation should be the baseline first step, followed by opportunity analysis (one option of which would be no change) based on sound criteria, leading to the preferred option and desired outcome with associated indicators. This will lead to delivery and ongoing monitoring and evaluation. There are however other approaches that could be adopted that would be equally valid. Any project proposal must be subject to evaluation.

The inclusion of the term 'problem' as the fist step of the framework is incredibly negative; it gives the impression that existing plantation or successional woodland on a potential open habitat is by default a negative issue that needs to be resolved. It astonishes me the Forestry Commission appears to have this attitude.

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?
The support needed will potentially vary incredibly depending on the project, on a case - by-case basis. The question should be how Forestry Commission much staff resource will potentially be taken in processing up to 30.000 ha of EIA determinations?	
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?
That the Forestry Commission should even consider 'trying not to' cause net deforestation is anathema. There must be a a categoric statement that deforestation will not occur in England. There should rather be a statement to the effect that the Forestry Commission will try to continue to increase woodland cover in England. As stated in question 1, decisions whether open habitat restoration from woodland should be permitted must be based on sound criteria, one of which will be the impact on overall forest cover in England.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
See my answer to question 1.	
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?
No. Assessments of short-term contributions to biodiversity objectives can be misleading in terms of sustainability clouded by the perceived aesthetic ideals of oen habitats. Long term and ongoing assessment should be practised, with the recognition that succession back from open habitat to successional woodland should be accepted if open habitat biodiversity gains are unrealised or economically prohibitive.	
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?
The practices suggested are logical. There is no means by which it is possible to ensure these practices are adopted, even if legislation were introduced, but a condition of funding for any restoration and subsequent management should be dependent on following best practice.	

No	Question.
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.	
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?
Considering that climate change is deemed to be the greatest threat to biodiversity globally it would seem logical that the balance must be weighted heavily in favour of reduction of carbon emissions (and increase in sequestration). Has the sequestration potential of the restored open habitats been fully assessed against the sequestration potential of woodland lost?	
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?
This is a much wider issue than should be dealt with in this consultation which is considering the restoration and expansion of open habitats. However, a dynamic approach to the management of open habitats should acknowledge that succession back from open habitat to woodland should be accepted if open habitat biodiversity gains are unrealised or economically prohibitive.	
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?
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?
This should have been part of the evidence that was gathered in advance of this consultation.	
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?
The first. As noted in your evidence (page 26) many of the biodiversity benefits that may accrue from open habitat restoration are dependent on management regimes that will	

No	Question.
	generate the ecological processes to deliver the niche requirements of priority species. The simple removal of forest cover will not deliver the biodiversity benefits which are the primary rationale for this policy.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	As stated above, a key criterion of this policy should be that it does not lead to deforestation therefore compensatory planting must be included. As with so many of the questions in this consultation it is too simplistic to suggest that one of the roles of compensatory planting is more appropriate than others, each will have its place.
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?
	See comments on question 3.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	The implications are inevitable if this policy is to be implemented, whether they are welcome or unwelcome is irrelevant.
Other comments	
	We welcome your input on any other aspect of this consultation.

Please include the "information about you" form with your response.[1]

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

Fax: 0117 931 2859

By 17.00hrs, Friday 5 June 2009.

[1] See www.forestry.gov.uk/england-openhabitats-consultation for a copy.