

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 05.06.09B
Your organisation (if any):	
Date:	June 2009

No	Question.
The nature of the change	
1.	<p>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> <p>The aspired scale of deforestation suggested in this consultation is of considerable concern.</p> <p>The consultation does provides an excellent opportunity to readdress the open habitats policy in terms of planned adaptation. Rather than focus on conservation of BAP priority habitats, with questionable balance of sustainable development benefits, it should focus on future land use needs.</p> <p>These would be for; sustainable resource for future populations, increasing climate change resilience, ensuring a strategic resource and providing an appropriate balance between sustainable development criteria.</p> <p>An evidence-based decision making approach, such as a long-term ecosystem services, should be adopted to define the real need and requirement. The approach would be broader and more inclusive, and although it might result in an unpopular policy with certain NGOs (mainly focused on biodiversity), it would better serve the United Kingdom. Until this is undertaken the scale suggested could be considered, by future generations, as highly detrimental.</p> <p>It is accepted that biodiversity is vulnerable, but existing open habitats are not effectively managed, provide a considerable burden on the public funds. A good example are grazing projects which have been accepted on theoretical potential and their support of rare breeds. This approach has not been proven successful and indicators such as condition assessment are extremely questionable, especially when compared to landscape scale forest mosaics.</p> <p>It is important that Forestry Environmental Impact Assessments (EIA) ensures that evidence used is fully robust and balanced of future needs and not focused on the creation of long lost conservation idyll.</p>

No	Question.
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>With reference to the themes (Table 4) in the consultation that defines the outcomes, I have some concerns with the structure of the themes.</p> <p>Reference the climate change theme there is overlap between 'ecological communities able to cope with threats' and 'carbon balance'. I understand the need to separate the two but this has left other climate change issues out.</p> <p>I would urge the inclusion of a factor 'resilience to natural hazards' (storms, flooding, wildfire, drought etc.) as stated in ETWF Delivery Plan (Aim two, climate change: context and objective CC2, CC3 and CC4). This would be consistent with national spatial planning guidance as well as service delivery targets. In the case of wildfires Open Habitats are predicted to be an increased risk (likelihood and severity) by 2040 (Met Office, Hadley Centre, 2008) and increasing thereafter.</p> <p>Has the factor and outcome 'ecological communities able to cope with threats' been developed to consider habitats and their related species that are unable to adapt to the threats defined? If they are not then a future policy may be chasing an unachievable goal. The proposed deforestation achieved may not be justified. As open habitats are predicted to perform poorly given predicted higher temperatures (spring and summer) and variable rainfall (thus not producing consistent moisture for heather etc.) then there is a question why we are conserving and not adapting our land use? Therefore it is questionable that these habitats can be maintained or enhanced. In Table 4 I would urge that the likely impact would be negative.</p> <p>The theme of 'carbon change' limits the climate change impacts that a proposed policy could cause. I would urge that an 'increasing resilience to climate change' outcome be adopted consistent to the aim in ETWF Delivery Plan. This would allow both mitigation and adaptation approaches. This would ensure that the scope of strategy in parallel to this consultation and fully consider carbon sequestration and greenhouse gases. How would the policy measure the increase in methane (a far more worrying aspect of GHG and greater than carbon) if increased grazing is used as a management approach?</p> <p>I would urge that an outcome 'increasing resilience to climate change' is included to cover Greenhouse Gas and Natural Hazards outputs.</p> <p>The outcome of 'financial viability' should ensure that the long-term call on public funding should be equal to or less than the forested cost. This would ensure that proposed deforestation is fully financially considered and does not reduce resources on other more important funded requirements (i.e. adapting to climate change).</p>	
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?
<p>Please add the following indicator to the 'financial viability' outcome:</p> <ul style="list-style-type: none"> • Trend of public funding of open habitats in comparison to original forested land. <p>Please ensure that the 'adaptation to climate change' outcome uses the existing carbon balance indicators that are inclusive of greenhouse gas emissions.</p>	

No	Question.
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?
<p>Strongly agree with the statement that woodlands and open habitats are mutually beneficial and support point 6.2.2 in the consultation, adept with longer rotations. During my six-years managing MOD Home Counties SPA Thames Basin Heaths and SAC Wealden Heaths we used a landscape-based approach using this system. The harvesting of trees off-set the costs of more difficult clearance and provided patches of lowland heath. The natural regeneration of Scots pine and birch slowly returned the woodland but proved suitable window for heather to support nightjar, dartford warbler and woodlark. In addition this had numerous benefits such as; fragmentation of open habitats to wildfire risk, economic woodland management, use of existing practice management systems and operational practices, sustaining skills, jobs and developing innovative operational approaches. Although this productive concept may not be understood by NGO, it perfectly suits land managers with forestry management experience.</p> <p>Using a forest mosaic with a long-term rotation of open habitats and woodland should be adopted as the first consideration of Forestry EIA (if it is appropriate upon the site) over deforestation of landscape scale areas and use of grazing. Practically foresters have the skills and equipment to ensure this process is viable.</p>	
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'?
No comment	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
No comment	
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?
<p>My current role allows me unique understanding of the public and professionals comprehension of forestry. The majority of people I make aware of forestry have limited, if at all, any understanding of the benefits of forestry. I note that the biodiversity focused NGOs have been allocated considerable sums (including public funding via HLF) to raise awareness of open habitats. Similarly they now dominant access management groups and suppress discussion about forestry. They promote large scale forest clearance to heathland and grazing. Their main incentive, to sustain financial viability via increasing paid membership, runs contrary to their corporate social responsibility.</p> <p>Although I am fully supportive of active and comprehensive consultation with regional and local stakeholders, I note that forestry is poorly represented and it potential not fully</p>	

No	Question.
	realised. This presents an imbalance on public consultations with poor regard for the real needs and requirements.
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?
	Strongly agree.
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 comment
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?
	Strongly support 'seek to impose the framework'
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?
Although the issue of the threshold is important I would suggest other consideration need to be considered first. If the net deforestation caused by creating open habitats falls upon productive (or potential) woodlands then the net loss is considerably greater than currently considered, especially with regard to carbon and greenhouse gas loss.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
	Too high.
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?
I would suggest not. This should not be a reason not to define data to establish evidence. This is a strong motivation not significantly increase deforestation at the lowest level, until a more robust evidence based approach has been successfully established.	
14.	Do you agree that management practices to minimise carbon emissions during

No	Question.
	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>Linked to consultation point 6.2.2 I would urge an additional point linked to Question 4 that promotes the use of natural tree regeneration/replanting, as part of a landscape scale approach, to increase the potential for carbon sequestration and decrease GHG emissions.</p> <p>Natural regeneration and well considered tree planting on open habitats should not be viewed as an ecological taboo, but rather an opportunity to ensure a sustainable resource to future generations, within balanced long-term vision.</p>
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?
	Strongly agree. The potential timber lost in supporting carbon materials is extremely important in future evaluation of a potential policy. In addition this issue should have predominance over biodiversity.
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?
	<p>Climate change is the long-term priority and primary focus. Biodiversity is sub-servant to it, and at present has a conservation focus that restricts practical adaptation and mitigation. The Climate change impact will define what biodiversity is viable given many open habitats species vulnerability to this issue.</p> <p>Broadmeadow (2008) defines that productive woodlands provide greater capacity than unproductive to meet the carbon challenge. FC England must ensure policy integration between open habitats policy and ensuring productivity, as defined by the CLA (Seeing the wood for the trees, 2009). If productively managed areas are lost as a result of a proposed open habitats policy, then unmanaged woodland must become productive to offset losses (financial, carbon, access, jobs, markets etc.) before replanting can make up to the difference (a lag of 70 to 180 years).</p> <p>The more productive trees that can be sustained the more robust biodiversity can be. If deforestation is approved replanting must be mandatory on a like for like basis.</p> <p>The landowner should be assessed to define if they are capable of productive long-term management in comparison to what is to be lost and if they are suitable candidates (management, skills, experience, background, knowledge etc.), otherwise resources may be misallocated.</p>
	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?
	Yes strongly agree, but with longer tree rotations to ensure MAI/CAI potential is reached before deforestation. I would also urge FC England to work with NE and JNCC to ensure this more dynamic approach becomes part of condition assessment of SSSI within

No	Question.
	Common Standards of Monitoring. This would provide considerable public financial benefit for HLS and ELS schemes.
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?
	<p>Yes there is considerable and necessary scope to modifying conservation objectives on some SSSI. In response to Climate Change Natural England's policy (Climate Change 2008) states that dynamic changes must be made to existing designations (SSSI) and new designations must be more adaptive. I would urge that Common Standards of Monitoring for condition assessment should also be similarly more adaptive and considerate of landscape scale forestry mosaics on open habitats. I believe the present condition assessment process does not provide a level playing field for such forestry practices in comparison to grazing.</p> <p>I would suggest a strategic approach at a national level by Natural England, FC England and Environment Agency. This must define a national vision for land use across the country for the next 100 years. This framework should be cascade at the administrative levels (regional, county, local) with increasing degrees of needs and requirements at each point. At the landscape level (defined by similar designations or habitats or land use but still over 100 years, but with 25 year reviews) there should be a clear land use vision setting out to land owners how their differing uses can form synergies (Access Management, Land Management, Markets etc.). This would promote better understanding between pro-heathland NGOs and forestry (These organisations are in conflict within the Thames Basin Heaths SPA for example), valuing opportunities and decreasing threats. Assessment should then be made at a site by site level, using the landscape scale vision and timescale to ensuring nationally with have sufficient resource reserves (timber, carbon, biodiversity).</p>
<p>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</p>	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
	Strongly support EFIP (2009) report on impact of confidence on the timber sector. Any consideration on economic activity should be climate change proofed to reflect threats posed on existing tree species and adaptation needs required for markets.
<p>Different approaches to applying policy</p>	
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>I would suggest the first (6.3.1) but I would urge the statement:</p> <p><i>"Where strategically it is appropriate the removal of some woods and forests may be necessary to restore and expand priority open habitats, which in turn is important for maintaining and enhancing wildlife. However, much of the open habitat is proving costly to manage and without appropriate management it could fail to deliver desired outcomes. We will therefore prioritise the quality of management of existing open habitat. This means that we will support the removal of woodland or forest to restore or expand open habitats, only where it is making the management of existing open habitat easier, with</i></p>

No	Question.
	<i>priority given using long-term landscape scale forestry mosaics of woodland and open habitats”.</i>
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	<p>As a condition for deforestation, if long-term landscape scale forest mosaics (as defined in my response to Question 4 and as a result of 20) can not be used, I would support compensatory planting of productive woodland (as defined in the strategic approach defined in my response to Question 18). It should use like-for-like species but the scale should be greater to reflect the potential lost income/volume caused deforestation.</p> <p>It should be within the same landscape area (to ensure local markets are protected) as the deforestation.</p>
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?
	<p>I would urge the following additionally questions (given changes suggested in Question 2):</p> <p>Ecological communities able to cope with threats –</p> <ul style="list-style-type: none"> • To what extent are open habitats still viable given predicted climate change impacts? <p>Long-term viability –</p> <ul style="list-style-type: none"> • Is the rate of re-management of unmanaged woodlands sufficient to meet the short fall in costs (carbon, financial, jobs, skills, access, biodiversity etc.)? • Is there sufficient potential for like-for-like replanting within the landscape area defined in the open habitats policy? <p>Climate Change –</p> <ul style="list-style-type: none"> • Does the potential increases in natural hazard caused by change to open habitats decrease the resilience of communities and government departments?
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	<p>Strongly support statement made about MOD Defence Estate land after managing 7,000 ha of SSSI, SPA, SAC for 6 years as Head Forester. These productively managed woodlands need to be fully recognised in their delivery of military doctrine (especially in ‘Fighting in Forests and Woods’) as well as their potential for markets, job, skills, access and recreation.</p> <p>Open Habitats should be independently assessed in a similarly way to sustainable woodland accreditation (similar to Forest Stewardship Council). If woodlands and forest are deemed sustainable by UKWAS to an international standard, should not open habitats</p>

No	Question.
	also be? Why should they be exempt? If they are not sustainable, why are we deforesting?
	Other comments We welcome your input on any other aspect of this consultation.
	<p>This consultation also highlights several questions that should be defined before the development of a policy.</p> <ol style="list-style-type: none">1) What is the appropriate and sustainable balance of land use in the United Kingdom?2) How do we ensure that unproductive woodlands fulfil their potential?3) Why are we looking to increase open habitats and deforest when existing are not effectively managed?4) Do the public have sufficient awareness of trees, woodlands and forests future potential if consulted upon open habitats?5) If woodland management upon open habitats is defined as sustainable, why are we deforesting? <p>I strongly support the comments made by the South East England Wildfire Group, sent in by Kate Hutchinson.</p>

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

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.

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