

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:	P G Blake
Your organisation (if any):	Munro Sawmills Ltd
Date:	26/05/09

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>In the immortal words of the Sun newspaper: "Are we all mad? Have we gone completely bonkers?"</p> <p>Britain is already being rapidly deforested at a time when we should be planting like never before. It is estimated that the Forestry Commission currently only replants 70% of the area that it clearfells. The rest is open space and environmental areas. In the private sector the figure is nearer 50% because of the poor grants and emphasis away from conifers. What is being replanted is more often than not slow growing hardwoods and scrub with low commercial value and little carbon sequestering capacity. New planting of viable commercial crops is virtually at a standstill because of the poor grant structure. Future generations will look back and say, "What were they thinking of! Why are we living in a shrubbery? Where is our productive woodland?"</p> <p>Britain is the least forested country in Europe (except Iceland). We import 80% of our timber. Yet despite this we are promoting biomass plants to burn our trees. 2.5GW of biomass generated electricity is currently under planning permission or proposed. If burning wood this would consume 30m tonnes a year. The output of Britain's forests is currently about 9m tonnes. We are in danger of rapidly deforesting the whole country and turning the trees into CO2. If a fraction of the money being thrown at biomass plants through ROCS (or environmental issues like the one in this consultation) were invested in new planting the forestry sector could be revitalised. The correct strategy is surely to encourage planting, not promote burning existing forests.</p> <p>Environmental initiatives like this one are much loved by politicians, but all too often they act as an excuse for ignoring the serious issues that affect the country. Forestry is a long term business with a need for consistent long term policies. We have had policy and grant changes every two or three years. New planting and replanting has been inadequate for twenty years. We don't need more environmental initiatives we just need</p>

No	Question.
	powerful incentives to persuade estate owners and farmers to PLANT MORE CARBON-SEQUESTERING PRODUCTIVE WOODLANDS!
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
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?
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?
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'?
6.	What do you think of our proposed outline definition of 'mature native woodland'?
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?
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?

No	Question.
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?
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?
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?
12.	Do you consider that the proposed threshold is about right, too high or too low?
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?
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?
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?

No	Question.
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?
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?
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?
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 role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
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	Question.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
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](#)

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By 17.00hrs, Friday 5 June 2009.

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