

# 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>                  | Professor Rob Fuller          |
| <b>Your organisation (if any):</b> | British Trust for Ornithology |
| <b>Date:</b>                       | 21 May 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? |
| <p>Whilst the BTO provides evidence and advice to help formulate and refine policy it does not seek to pursue or lobby for a particular policy position. Our comments will, therefore, be based mainly on where we see a need to improve the evidence base or to take further account of existing ideas, theories, information and knowledge in reaching decisions. We do not have a view about how much open habitat there should be. However, with regard to the second question, we think that more account should be taken of existing open space within forests and the management of these areas to deliver biodiversity benefits. Assessment of what these existing open areas already provide is needed.</p> |  |
| <b>Desired outcomes</b>  |  |
| 2.   | Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?  |
| <p>'Ecological communities able to cope with threats' is the key desired outcome. This is laudable but whether this is achieved will depend to a very large extent on how the open land is subsequently managed and on the habitat structures that develop. Developing habitat heterogeneity at different scales is likely to be an important aspect of future strategies to improve resilience of biological communities and I think this needs to be acknowledged. It is also worth pointing out that much managed forest does provide a degree of habitat heterogeneity through rotational management and that many heathland species do adapt to the early stages of forest development.</p>                     |  |
| <b>Measuring the success of the policy</b>   |  |
| 3.   | Have we developed a reasonable set of indicators for evaluation? Do you wish to  |

| No  | Question.   |
|---|---|
|   | suggest any amendments to this indicator list?  |
|   | <p>The indicators for measuring success under the desired outcome 'ecological communities able to cope with threats' are not adequate. In particular an indicator based on patch size and connectivity is of highly questionable value in the absence of direct data about biodiversity; such an index would tell us nothing about functional responses and assumes too much about the effectiveness of connecting features. There should be properly structured survey and monitoring of ecological communities on at least a representative sample of sites. Only in this way will it be possible to assess how communities are responding both to the initial habitat creation and to its ongoing management. I am sceptical about relying on spatial pattern as an indicator of habitat quality for biodiversity.</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>Woodland and open habitats are complementary in their biodiversity value; both are clearly valuable in their own right. Whether they are 'mutually beneficial' is unclear. It is not, however, all that helpful to think simply in terms of 'woodland' and 'open habitats' because both encompass a wide range of habitat types and structures that should be encompassed in biodiversity management planning. Open habitats that exist within woodland are extremely important habitat elements for biodiversity so I suspect this simple dichotomy could be confusing in some circumstances.</p> |   |
| <p><b>A presumption against removal of 'mature native woodland'</b></p>   |   |
| 5.  | <p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>  |
| <p>Broadly yes. But (a) need to acknowledge that maintaining open habitats within these in the form of rides, glades and, where appropriate, through coppicing is important for biodiversity conservation, (b) need to recognise that some young woods are of considerable value in their own right e.g. coppice rotations and young wet woodland.</p>  |   |
| 6.  | <p>What do you think of our proposed outline definition of 'mature native woodland'?</p>  |
| <p>OK with the above provisos.</p>  |   |
| <p><b>We will expect practitioners to help local users to participate in development of the initial proposals</b></p>   |   |
| 7.  | <p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>   |
| <p></p>   |   |
| <p><b>We will promote mechanisms for prioritising woodland removal at a regional level</b></p>  |   |

| No   | Question.  |
|--|--|
| 8.   | Do you agree that prioritisation at a regional level is appropriate for this policy?   |
|  | This is important - taking account of regional conservation and economic contexts is essential. Of course, there is a question here about what is meant by regional.   |
| <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?   |
|  | This framework is not entirely satisfactory. Its essentially linear nature does not appear to allow feedbacks and management to be adjusted as experience accumulates and (hopefully) information is gathered through research and monitoring.   |
| 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?  |
|  | There needs to be systematic structured monitoring and more detailed research to assess exactly how ecological communities and vegetation develop on restored open habitats. This will (a) help management plans to be adjusted where necessary and (b) help us gather more fundamental information on ecosystem change and restoration.   |
| <b>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.</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?   |
|  |  |
| 12.  | Do you consider that the proposed threshold is about right, too high or too low?   |
|  |  |
| <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?  |
|  | A lot could be learnt from a new study that was a combination of literature review and fieldwork with the aim of addressing the following two questions: (a) what is the relative contribution of young forestry and open heathland to biodiversity? (b) what has been the response of biodiversity to those recently-restored open habitats? The last question should address causes of variation in responses and also compare recently-restored and long- established open habitats. Such an exercise, conducted through a rigorous approach, would greatly inform exactly what might be expected from a major new drive for open habitat creation. It could also inform decisions about site selection and |

| No   | Question.   |
|--|---|
|  | management.   |
| 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?   |
|  |   |
| 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?  |
|  |   |
| <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>   |   |
| 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?  |
| A dynamic responsive approach to land management is highly desirable. We cannot be sure how species will repond to climate change. Some may need to disperse considerable distance into new climatically suitable areas. Others may simply shift into different nearby microhabitats or not be obviously affected. We need to be flexible in our future management responses and not necessarily stick to current perceived good practice. This is why feedback / adaptive management is essential (question 9). |   |
| 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? |
| Detailed monitoring of population trends and niches of exemplar species in functional groups at representative sites may help to be provide the knowledge base upon which a dynamic management system could be taken forward. It may become necessary and appropriate to reconsider attitudes to SSSI management at some future stage. It would not be shortsighted to use SSSI favourable condition as a benchmark or endpoint for restoration projects more widely.  |   |
| <b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b>  |   |
| 19.  | Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?  |

| No  | Question.  |
|---|--|
|   |  |
| <b>Different approaches to applying policy</b>  |  |
| 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? |
|   |  |
| <b>The role of compensatory planting</b>  |  |
| 21.   | What is the appropriate role of compensatory planting in this policy?  |
| Compensatory planting should be consistent with regional priorities as defined by regional forestry strategies.   |  |
| <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?   |
|   |  |
| <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?  |
|   |  |
| <b>Other comments</b>   |  |
| We welcome your input on any other aspect of this consultation.   |  |
| <p><b>One point that does not seem to be clearly covered by any of the above questions concerns the implications for management in forests that are not converted to open habitat; this could be significant at a local / regional scale. A large conversion of managed conifer forest to open habitat could result in the remaining forest being managed more intensively, for example through the felling of retentions on a shorter rotation and through the planting of permanent open space. Were this to happen it would probably have a deleterious effect on biodiversity in managed forests. The importance of many managed forests as large reservoirs of biodiversity should not be under-estimated.</b></p> |  |

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

**Please send your completed forms to:**

[Dominic Driver](#)

Senior Projects Officer | Policy and Programme Group | Forestry Commission England

<sup>1</sup> See [www.forestry.gov.uk/england-openhabitats-consultation](http://www.forestry.gov.uk/england-openhabitats-consultation) for a copy.

620 Bristol Business Park | Coldharbour Lane | Bristol | BS16 1EJ  
0117 906 6003 | 07779 627668 | [oh.consultation@forestry.gov.uk](mailto:oh.consultation@forestry.gov.uk)  
Fax: 0117 931 2859

**By 17.00hrs, Friday 5 June 2009.**