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Dear Mr Driver

### ***Restoring and expanding open habitats from woods and forest in England***

The Campaign for National Parks (CNP) welcomes the opportunity to respond to this consultation. CNP is the national charity which campaigns to protect and promote National Parks for the benefit and quiet enjoyment of all. National Parks have two statutory purposes:<sup>1</sup>

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks; and
- To promote opportunities for the public understanding and enjoyment of the special qualities of the Parks.

A wide range of public bodies, including the Forestry Commission, must take the two purposes into consideration when making decisions that could affect the National Parks.<sup>2</sup>

As you will be aware, 8 per cent of England is designated as a National Park.<sup>3</sup> Although it differs from Park to Park, each contains areas of woodland and forest, including coniferous plantations and other areas where trees such as pine and birch have become established through natural regeneration. In this context it is clear that the policy that is the subject of this consultation is relevant to and will have an impact on the Parks.

Rather than respond in detail to the consultation questions we wish to submit some general comments only, focusing on the interface between the emerging policy and National Park interests.

## **Comments**

### *Chapter 4 - Evidence*

CNP recognises the complexity of considerations that must be taken into account in developing a policy on open habitat restoration that will ensure greater benefits than

<sup>1</sup> As set out in section 5 of the National Parks and Access to the Countryside Act 1949, as amended by section 61 of the Environment Act 1995.

<sup>2</sup> Section 11A(2) of the 1949 Act as amended by section 62(2) of the Environment Act 1995 requires all public decision-making bodies performing any function in relation to, or so as to affect, land in a National Park to have regard to National Park purposes.

<sup>3</sup> Excluding the South Downs, to be confirmed in final soon.

disadvantages across a number of key priority areas, biodiversity and species' resilience to climate change being foremost among them. We agree with the factors to be taken into account that have been identified in the Forestry Commission's evidence paper and summarised in Table 4, and are pleased to note that landscape impacts are included. These will be particularly important in a National Park context.

## *Chapter 6 – Policy proposals*

### *6.1 – Elements present in the policy*

With regard to the Commission's six proposed elements for inclusion in the policy we have several minor comments, but will break briefly with the order of Chapter 6 so as to start with the most important from a National Park perspective.

At 6.1.4 (We will promote mechanisms for prioritising woodland removal at a regional level), we agree broadly with the suggested regional approach. However, we would add two points: first, with regard to land within a National Park, we believe that the appropriate approach to prioritisation must be to work closely with the relevant National Park Authority (NPA) in order to take decisions that are consistent with the National Park Management Plan and that reflect the area's special qualities. In some cases this may lead to no restoration of open habitat and in others it may lead to a considerable amount – the critical point is that decisions are taken within the context of, and adhere to National Park statutory purposes and the management plan for the area. Second, with regard to any area being considered for restoration which is close to a Park, the purposes must also be taken into account where taking action is likely to have an impact on the National Park environment (in accordance with the statutory duty on all public decision-makers referred to on page 1 of this response).

In relation to 6.1.2 (A presumption against removal of 'mature native woodland'), we strongly support this stance but believe that the text as drafted should be clarified and strengthened. The final sentence before Question 6 states: "Unless there are exceptional circumstances, we will normally refuse proposals which include removal of mature native woodland". Some explanation of the type of situation that might be regarded 'exceptional' should be given, as it is difficult to comment in the absence of more information. We accept that unbending prescription might not be the most favourable option, but at present there is nothing to suggest what types of exception might be allowed. The word 'normally' should also be removed, as it is redundant alongside the qualifier as to exceptional cases.

With regard to 6.1.3 (We will expect practitioners to help local users to participate in development of the initial proposals), we welcome the emphasis that has been given at various points throughout the document to local participation in decision-making. In a National Park context 'local users' can include a wide spectrum of the public and we agree that it is important to involve those who know and care about an area in developing proposals that will affect it. Every National Park has an associated voluntary society made up of individuals committed to safeguarding National Park interests and protecting and promoting their area. As the national voice for these groups and other voluntary sector organisations that are concerned with supporting the National Parks we welcome the Commission's commitments. More broadly, we hope that the Commission will draw on its experience as part of the LIFE II Partnership in the New Forest, which included the restoration of more than 2000 hectares of open habitat through the clearance of conifers and other non-native species. We understand that that project involved extensive public participation through many different mechanisms ranging from workshops, seminars, conferences and other consultation events, to guided walks and talks. We are encouraged by the

Commission's recognition of the need to listen to and engage with local groups as well as to help them to understand the importance of open habitats and the range of considerations that must be taken into account when applying restoration policy.

At 6.1.5 the Commission outlines its proposal to apply a framework of evaluation to projects. Needless to say we endorse this approach, as it will be critical to assess the overall success of the policy as well as to learn lessons that can be applied along the way. The only suggestion that we would make is that some consideration be given to allowing flexibility in the quantity of information required to reflect the scale and complexity (or simplicity) of any given proposal. We accept that for the sake of consistency in gathering evidence and compiling comparative data there must be some common structure and content to the evaluation framework, but within this there could be scope for – and merit in – a small number of different 'tiers' of information required, depending on the proposal. In terms of how to apply the framework, we believe a hybrid of the suggested options would be appropriate. In particular, evaluation should be mandatory (albeit tailored to reflect scale and complexity) *and* the Commission should provide guidance and funding support.

Section 6.1.6 sets out the Commission's intention to avoid net deforestation by setting a threshold rate of woodland removal. Without commenting on the detailed options for this proposal we would like to voice our support for the principle, with just one query as to why the Commission states only that it will "try not to go over a threshold". It is not clear why, if a threshold is to be determined and however it might be managed, the Commission cannot commit firmly not to exceed it.

## *6.2 – Key variables*

The three key variables identified go some way to demonstrate again the complexity of considerations in developing and applying this policy. We do not wish to comment in detail on each, save for some general comments in relation to the questions of how to integrate objectives relating to biodiversity and reducing carbon emissions, and the approach to management once initial restoration of sites is complete.

On climate change, first, we agree that all possible measures to minimise carbon emissions in the way that restoration is performed should be undertaken.

Second, with regard to total negative impact on carbon balance brought about by restoration, this point should only serve to strengthen the commitment to ensure that overall, deforestation is avoided (see above comment, 6.1.6 and below, 6.3.4 - compensatory planting).

Third, the Commission highlights the 'communication' role of trees with regard to climate change – that most people believe that trees have a significant role to play in combating climate change and that, as a result, permanent woodland removal could make it harder to communicate positive climate change messages. It is right to be alert to the risk of negative messages brought about through restoration of open habitat. However, we believe the difficulties identified are surmountable, not least through the kind of public engagement and participation referred to elsewhere in the document (see comment above re 6.1.3). Again, we hope that the Commission's past experience in educating people and involving them in the development and delivery of specific proposals will come to the fore. In a National Park setting NPAs will be an invaluable partner in this regard, having experience, expertise and local knowledge that can contribute to meeting the challenge.

On the management of sites once initial restoration has taken place, without favouring any one of the options discussed we can see merit in at least developing further the idea that in some situations, outside of SSSIs, there may be a case for a more dynamic approach than pursuing the technical definition of 'favourable condition' would allow. We would support the outcomes-based approach outlined in the final paragraph before Question 18. In every case, as above, where proposals would have a direct or indirect impact on a National Park, we would like to reiterate the need to take into account National Park purposes and work closely with the NPA and other groups with an interest in and commitment to the Parks.

### *6.3 – Different approaches to applying policy*

Briefly, we believe that each of the approaches outlined in this section raises valid concerns but no single strategy, in isolation, would be appropriate. Therefore we would support a combination that sought to realise the wildlife value of potential open habitat sites while also reflecting the need to ensure long-term sustainability and appropriate scale and pace of change at a national level.

With regard to 6.3.4 (the role of compensatory planting), we note that whichever approach is taken, it must be considered in the context of the overall aim to avoid net deforestation. This would suggest that merely 'encouraging' the inclusion of woodland expansion in individual area proposals would not be appropriate. However, an option might be to combine formal commitments to 'twinning' with some form of geographical limitation, so that local / regional carbon, green infrastructure, recreation and access concerns might be addressed.

Thank you for the opportunity to contribute to the development of this policy. We hope that our comments are helpful. Please do not hesitate to contact us should you require any further information or have any questions.

We look forward to seeing the outcome of this consultation.

Yours sincerely



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