

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:	Roger Cartwright
Your organisation (if any):	Landscape and Woodlands
Date:	24 April 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?
NO - There should be no pre-determined level of intervention - a value judgement is needed in relation to the issues for each individual site	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>YES - Restoration of open country is not just about providing scientific and nature conservation benefits - there are many other important reasons for restoration, most have been correctly listed as factors in table 4 but I think you have shied away from subjective aspects - such as landscape beauty which many people will find a more compelling reason for restoration than just providing habitats.</p> <p>I am not sure that you have correctly identified the likely impacts, these will vary widely. In the area I am familiar with there can usually be more positive landscape impact.</p> <p>Restoration of a sustainable resource should have a high priority - this should include provision for the restoration of a viable long term system of future management (ideally not dependent on continued subsidy). Usually this will involve the restoration of some sort of conservation grazing (ideally as part of a local farm unit).</p> <p>If a viable low intensity farming or game management system is established this need not be more expensive to manage than the woodland it replaces.</p> <p>There were sound practical reasons why some areas were planted and if you restore the previous habitat without changing the underlying economic/land use/management issues (such as inherently poor land with difficult access) you will not have achieved anything that will survive for long.</p>	

No	Question.
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>YES - but you have missed any reference to landscape quality: assessment of visual improvement/or regression assessment of public perception/reaction</p>	
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>YES - in some circumstances - for instances mosaics may be more resilient than either woodland or open land</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'?
<p>YES - but there can also be a presumption against removal of other woodlands, such as designed or well loved wooded landscape, regardless of origin.</p> <p>woods that have been identified as valuable landscape features in local plans, particularly in National Parks and AONB's</p> <p>Restoration of designated 'theoretical' open habitats should not be allowed to overrule other important interests - after looking at options a balanced decision (based on a soundly based value judgement) needs to be made in relation to each particular case.</p>	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
<p>The definition is alright as an outline but should not be 'set in stone' - the actual assessment should be made in relation to each individual site and its history. in some circumstances potential native woodland can be just as valuable as mature woodland.</p>	
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>YES - this should usually be regarded as essential - this is a major landscape change comparable to significant afforestation and should receive similar detailed consideration and consultation.</p>	

No	Question.
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?
YES	
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?
<p>NO - it is too prescriptive - what we are really considering are options for change, consultations, a preferred design and final decision based on a value judgement.</p> <p>There is no magic formula that will provide the correct answer for every circumstance. Professional survey, teamwork, planning and design are all needed for every individual site.</p>	
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?
As much support as possible - help with ecological, landscape and historical surveys as required - this will vary for individual sites.	
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?
<p>NO - there is no magic figure but speed of overall change should be kept under review and it would be sensible to try and ensure that on a regional level there should be substantially more woodland replacement planting than removal.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
<p>There is no need for a threshold area if woodland clearance proposals are considered along the lines being discussed.</p> <p>Creation of large woodland rides, glades and viewpoints etc. should not count as woodland removal but as an integral part of good forest management.</p>	
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

No	Question.
	habitats?
	Rapid change is likely to be counterproductive - emphasis should be on dynamic systems of natural change and succession.
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?
YES	
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?
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?
	scientific assessment where practical - combined with common sense and balanced value judgements.
<p>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</p>	
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?
	<p>A more dynamic approach is needed - 'favourable condition' is meaningless as a basis for this sort of fundamental change in land use.</p> <p>Management should take account of the actual situation on the ground regardless of paper designations (intended for other purposes).</p>
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?
	As above - SSSI's are a paper designation - originally intended to protect special areas against undesirable change and destructive development and they are not usually a suitable basis for positive management and guidance for beneficial change to meet a wide range of objectives.
<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?

No	Question.
	Local circumstances will determine - climate change and resource depletion need to be considered.
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?
	They are all important and the preferred option should fit individual site circumstances - plus consideration of the appropriate scale and pace of change at the LOCAL level.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	IMPORTANT - there should be no overall loss of woodland area and ideally, integrated schemes that involve some woodland retention and new planting should be favoured.
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?
	YES but Landscape improvement, should be added as a separate outcome - landscape design and visual improvement are fundamental (much more than just 'good practice').
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	YES - too rigid adherence to over-zealous interpretation of legislation (intended for other purposes such as SSSI's, The Crow Act) can inhibit sensible change and the adoption of sustainable management systems.
Other comments	
	We welcome your input on any other aspect of this consultation.
	<p>The main thing is to provide well thought out guidance and avoid a rigid over-prescriptive approach to this complex and sensitive subject.</p> <p>There will always be situations that require a different approach and that are impossible to predict and plan for.</p> <p>Employ good field staff, involve them in the planning and decision making process and then let them get on with the job.</p>

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

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

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.

CONSULTATION - Supplementary Notes on restoring and expanding open habitats from woods and forests in England – Roger Cartwright, April 2009

The policy challenge

1. The key challenge is to establish a policy that encourages woodland expansion, provides environmental, social, and economic benefits for everyone now and in the future. A good example of this is the New National forest. This policy should be flexible and include a commitment to allow (exceptionally) the restoration of either whole blocks of forest or parts of forests (or woods) to open ground where there is a good case for such action. Taking account of all the issues that have been identified in the Consultation Document.
2. Open habitats for wildlife or scientific interest (regardless of designations and the delivery of biodiversity objectives) although important - should not have an over-riding special priority over other considerations - such as landscape, timber and land resource management issues. A balanced consideration of all relevant issues is required in each individual case.
3. 'Fat tracking' because it is 'The Policy' should not be allowed to over-rule the legitimate consideration of this full range of relevant issues in each individual case. Forest clearance and restoration to open space for whatever purpose should be treated with similar consideration and consultations (where necessary) to new planting and ideally schemes should include both. The existing Forest Design plans are perfectly adequate for delivery – there is no need to re-invent the system.
4. We need a simple policy that allows (but does not dictate) effective and open decision making about when it is right to remove woods and forests on potential open land and when it is wiser to retain them. This will help make sure that we have a landscape that delivers more public benefits overall now and in the future and a process of change that is supported by most people.

An approach to the challenge

5. A Strategy for England's Trees, Woods and Forests (ETWF) and the England Biodiversity Strategy include commitments to develop this policy with the Forestry Commission as the lead body. Ministers will make the final decision on the policy.

The Forestry Commission should be neutral but committed to developing workable policy options that take into account all of the Government's aims within ETWF: a sustainable resource, climate change, landscape and the

natural environment, quality of life, and business and markets. They will need to give clear direction to government with no bias to particular special interests.

6. It would help to implement this policy if the management of agreed open land restoration by the private sector could be automatically entered into relevant agri-environment grant aid schemes (where applicable) without the necessity for a separate application to Defra, Department for Energy and Climate Change and Natural England. A 'seamless' transfer to a Higher Level Stewardship grant aid scheme would be a very positive way of ensuring the success of this policy.

Consultation.

Wide ranging local consultation and adjustment of plans when necessary is the key to a successful, democratic and socially accepted policy.