

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:	Mike Seville
Your organisation (if any):	Country Land and Business Association
Date:	26 th May 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?
<p>No.</p> <p>For private land this is essentially a land ownership rights issue. it should be a matter of choice for the individual owner. There must be no compulsion on private owners to remove woodland to meet any targets this policy may set.</p> <p>The CLA recognises that open habitats can make a valuable contribution to biodiversity and many CLA members own or manage large areas of open habitat providing a significant contribution to that biodiversity.</p> <p>However this policy should in no way be target driven it should instead be criteria based. A policy that is target driven even if that target is arrived at after consultation will inevitably result in the criteria being altered and in bad decisions being made in its implementation purely to meet the targets. The removal of targets will also remove the spurious argument currently being used by some sectors that they are working for the greater public good and helping to meet government targets.</p> <p>The criteria should take effect as soon as the policy is introduced and should cover all proposals for deforestation including any land on the public estate already identified for deforestation.</p> <p>The criteria should take account of the following:</p> <p>Climate change is an overarching global issue that affects us all. If we fail to slow down and halt climate change then any attempts to address local conservation issues such as open habitats are doomed to failure.</p> <p>Land is a precious resource that in the past we have had the luxury of wasting, as the global demand for food ,renewable fuel and fibre increases it is vital that we optimise the</p>	

No	Question.
	<p>use of our land to produce not only local environmental benefits but also the wider benefits of food, fuel, fibre and carbon sequestration.</p> <p>The Inter-Governmental Panel on Climate Change (IPCC) states "that reducing deforestation had to be a cornerstone of global strategies to tackle climate change".</p> <p>The Stern Report 2006 stated: "The investment that takes place in the next 10-20 years will have a profound effect on the climate in the second half of this century and in the next". Woods and forests make a small but significant contribution to the UK Government's commitment of reducing carbon emissions. Further, this contribution should be met by all UK countries, i.e. the following scenario should be avoided where reduced woodland cover in England is balanced through increased woodland cover in Scotland. Fast growing tree stands (softwood) sequester between 3-10tC/ha/annum; over the lifecycle of a stand this amounts to about 200tC/ha/annum.</p> <ul style="list-style-type: none"> - Woodlands play a role in mitigating against the effects of climate change by, for example, reducing soil erosion, alleviating flooding and providing shade in both the urban and riparian environment. - Carbon balance: The role of forest soils - carbon content of woodland soils is generally higher than soil under any other vegetation cover (average of 217tC/ha). Managing woodland of low commercial value as carbon store rather than removing these (carbon reserve management) to boost carbon storage capacity is probably still a better use of that land than conversion to open habitat. - Woodlands / forests, in particular softwoods, play a role in climate change mitigation through substitution of fossil fuels and materials. Energy used to manufacture equal volumes of: <ul style="list-style-type: none"> Sawn timber: carbon released (kg/m³) 15; carbon stored (kg/m³) 250 Steel: carbon released (kg/m³) 5320; carbon stored (kg/m³) 0 Concrete: carbon released (kg/m³) 120; carbon stored (kg/m³) 0 Aluminum: carbon released (kg/m³) 22000; carbon stored (kg/m³) 0 <p>Typically the total embodied energy in a timber-frame house is 250 kWh compared with 100 kWh for a brick house.</p> <ul style="list-style-type: none"> - Possible inclusion of Harvested Wood Products accounting in the post 2012 climate regime. Assuming sustainable forest management - if a forest is managed so that the standing stock of the forest remains at least constant over time, and the stock of wood products is increasing, then carbon dioxide is being removed from the atmosphere in net (Estimations of net emissions on basis of pool/stock changes). - UK government pledge of zero emission new housing by 2011. - UK Habitat Action Plan forestry and woodland expansion targets. Current existing fragmentation of woodland habitats and potential affect of resilience of this habitat in the face of climate change. Woodland species of plants and animals are often specialists that are poorly adapted to survive in open habitat. Consideration of minimum woodland size (even within a mosaic of habitats) to maintain resilience. Any new plantings will take about 50 years to deliver ecological niches and to provide an effective link at landscape scale. - Economically valuable forest can be managed sensitively in ways that encourage and promote social and environmental principles and much has been done over the past twenty years. - Lack of robust figures on UK deforestation. Deforestation takes place through existing policies / commitments to creation of open habitat, development, felling licences, etc.

No	Question.
	<p>For example in 2003, FC estimated a rate of 500ha/year as an absolute minimum (based on felling licences). However, OS data showed a mean of 2,925 ha/year and a peak at over 5,000 ha/year (rolling surveying programme). Deforestation alone currently accounts for some 20 % of global emissions of CO₂, and its prevention around the world is a global priority. Estimates of the UK deforestation rate are required for reporting under the UNFCCC GHG Inventory and the Kyoto Protocol.</p> <ul style="list-style-type: none"> - UK government's renewable energy targets (15% of total energy needs): woodfuel and timber production needs to be matched to end-users for optimal utilisation of wood's contributions to reduced fossil fuel consumption. Biomass contributes 83% to the renewables target of which 10% is wood (with a potential contribution of 16% should a further 2Mt of wood be made available which equates to a 60% increase in wood production in England). - Carbon trading: The value of forests, forest vegetation and forest soils as an increasing pool of carbon. Carbon is now a traded commodity and forests once included in the EU trading scheme could provide currency (at 2004 prices, the sequestration in UK forested land of 16.30 Mt CO₂ would be worth €160 million annually). - Climate change and its detrimental effect on the health of forests and woodlands, in particular commercial softwood stands, i.e. increased loss of forests and woodlands / greatly reduced yields due to increased pest and disease incidences, windfall, unfavourable growing condition for current species mix. Potentially there could be a natural, uncontrolled creation of open habitat and additional unmonitored deforestation. - The prolonged use of public money (cost of £61 million at higher level of intervention) to create and more importantly maintain a transient land type. <p>There are no natural habitats or landscapes in England; indeed there is not a square inch of the English countryside that has not been affected by human intervention at some time in our history. Open habitats in England are not natural; they were created by human intervention and rely on constant and in many cases quite intensive human intervention for their continuing existence.</p> <p>In England heathland is not climax vegetation and without continued human intervention it is constantly trying to evolve firstly into primary woodland and progressively into climax woodland.</p> <p>There is no set figure for the amount of heathland that this country should support nor is there any magic figure for the number of nightjars, woodlark, sand lizards etc we should expect to survive in England.</p> <p>The management of land for commercial purposes and to provide food and fuel is perfectly legitimate and in England has a historical precedent dating back many centuries.</p> <p>Up until very recently heathland was created or removed for sound commercial reasons either for a cash return or to provide food and fuel.</p> <p>The current drive for de-forestation to create more open habitat is being driven by the personal aspirations of a very small number of very vociferous people in a small number of often single interest organisations.</p> <p>The policy for deforestation to create open habitats should be in no way driven by arbitrary targets devised by this small number of vociferous individuals.</p> <p>The open habitat that is created by this deforestation is often not the same as that which was there before the current generation of woodland. the soil has already become woodland soil and thus without expensive and aggressive treatment, often involving practices which release large amounts of Co₂ both from the soil and the process it is impossible to get them back to anything like a heathland soil.</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>No</p> <p>There is too much presumption that deforestation is acceptable and that a case is having to be made for not proceeding it when actually it should be the reverse and a case should have to be made for any deforestation to go ahead.</p> <p>The following ammendments should be made:</p> <p>Ecological communities able to cope with threats. If as is stated the main threat to ecological communities is climate change then it is clearly important that the policy does not in any way either further contribute to climate change or impinge upon the valuable role that all woodland but particularly high yielding productive woodland can play in mitgating climate change.</p> <p>It is important that we do not fall into the trap of thinking that only open habitats have biodiversity value. Woodlands also have biodiversity value which is also under threat from climate change and would be under more threat from excessive deforestation for open habitat creation. This biodiversity value is not restricted to ancient or native woodland, studies by forest research have clearly established that plantation stands make a significant contribution to biodiversity. Additionally most plantation woodland is still first generation woodland and with appropriate and sensitive management its biodiversity value can be significantly enhanced in the second generation.</p> <p>Financial Viability</p> <p>This should also consider the benefits that this money could buy if used elsewhere in the forestry sector for example to improve the productive management of woodland or for the planting of new productive woodland.</p> <p>Keeping to Government commitments on woodland cover.</p> <p>It is not enough to maintain net woodland cover we should also be increasing woodland cover by planting more productive woodland and increasing the quality and productivity of our existing woodland.</p> <p>Positive engagement by local and other users.</p> <p>This is especially important where deforestation is proposed on public or quasi public land. Local public opinion must be actively canvassed and given due weight when assessing if the deforestation should be allowed to go ahead.</p> <p>This must also include consultation with potential business users of the existing and "future" forest resource.</p> <p>Carbon Balance</p> <p>This is not strong enough especially in the light of Governments commitment to even tougher targets on carbon emmissions, it should read: Woods and forests make an increasing contribution to the UK Governments commitments for reducing carbon emmissions.</p> <p>Timber sector activity.</p> <p>This is totally unacceptable. When the timber sector has the potential to contribute so much to climate change mitigation through material substitution and with increased</p>	

No	Question.
	<p>global demand when security of timber supply for both material substitution and renewable energy is going to become ever more important we should be aiming to increase our homegrown timber production. The EFIP study has demonstrated that there is already a shortage of material of the right quality and species to service the requirements of our existing processing sector. At a minimum this should read there will be no reduction in the longterm supply of timber of the quality and species required by the processors within whose catchment the area lies.</p> <p>Woodland Biodiversity</p> <p>This must be given at least equal weight if not more weight than the biodiversity that may or may not be created by deforestation and open habitat creation.</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?
No	<p>The policy should not be target led therefore any indicators relating to target areas or species populations are false</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?
No	<p>Woodland provides a much wider range of eco system services and public benefits than open habitats.</p> <p>Appropriately managed woodland can and does provide many of the benefits of open habitat, with the permanent removal of the trees open habitats provide only a very few of the benefits that woodland does.</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'?
Yes	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
OK	

No	Question.
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?
Local engagement is very important but this should not be target lead so this should not be about setting priorities rather it should be about informing the local stakeholder of the consequences of the proposals and ensuring that they meet the criteria.	
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?
<p>Firstly we should not be prioritizing woodland removal we should be prioritizing woodland creation.</p> <p>See above if the correct criteria are adopted then the effects will be appropriate for the region.</p>	
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>Yes there should be a frame work but this needs to be firmly based upon the criteria which means that some of the suggested indicators are inappropriate.</p> <p>For the public forest estate this frame work should be imposed.</p> <p>For private woodland you should insist that the criteria within the frame work are met as a condition of any public funding.</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?
None. The cost of carrying out this evaluation is another additional cost over retaining the area as woodland therefore it is a cost that the proposer should expect to bear	
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>Yes. whilst there should not be targets for the area deforested to create open habitats there should be a threshold over which woodland removal should not go. however it is not good enough to say that this should be no net decrease in woodland area, nor is it acceptable to utilise the Kyoto definitions of woodland to fiddle the figures. Overall we should be looking to see an increase in productive woodland cover.</p> <p>Existing public funding for new planting should not be used to replace woodland removed to create open habitats. the purpose of that money is to increase woodland cover and it</p>	

No	Question.
	<p>would be unethical to use it otherwise.</p> <p>Applicants wishing to permanently remove woodland for any reason including open habitat creation should be required to contribute to a planting fund administered by the Forestry Commission which would then be used to fund compensatory planting elsewhere. It may be appropriate for this fund to be held regionally in the first instance which would encourage the compensatory planting to be carried out locally. The level of the contribution the same as the level of new planting grant.</p> <p>The general principle should be that compensatory planting should be like for like, but this should be based on the criteria. It does not necessarily mean exact like for like, it may well be acceptable for an area of low yield scots pine for instance to be replaced with a smaller area of higher yielding Douglas fir, or low quality birch to be replaced with potentially higher value oak. The details would have to be further discussed. The principle is that the money in this fund would effectively mean that the policy would have no effect upon the productive capacity of the woodland cover. Productive capacity is also related to the carbon value of that woodland.</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	See above
<p>Key variables</p>	
<p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
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?
	<p>Probably not.</p> <p>This question assumes a simplistic relationship between levels of restoration / expansion of open habitat and health of habitat / biodiversity.</p> <p>Climate change should be the over-riding concern and any measures that reduce CO2 emissions should be top priority. A run-away climate will have a catastrophic impact on the survival of most species irrespective of extent of habitat.</p> <p>in the short term i.e. next ten years we should adopt the precautionary principle and concentrate our efforts on</p> <ol style="list-style-type: none"> 1. Mitigating climate change 2. Improving the management and condition of existing open habitats. 3. Developing ways of managing those habitats that are cost effective and financially sustainable. 4. Monitoring the effects of climate change on those existing 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?
	Yes but the impact of the management practices of deforestation and open habitat creation should also be included in the carbon account for the proposal when assessing it against the criteria.

No	Question.
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	<p>it is vitally important that this is included. the trouble with so many policies such as this is that there is no long term vision. If we are to halt and then reverse climate change then we are going to have to totally rethink the way we live. We are going to have to become much more reliant upon the use of sustainable renewable materials in all the products and services that we use. This combined with the continuing increase in the human population and the effects of existing and unavoidable immediate climate change means that we are going to have to optimise the use of our land to maximise food, fuel and fibre production whilst maintaining environmental security. we are going to have to examine and adopt land management practices that allow us to do this in a cost effective and financially sustainable way FOR EVER. As a nation we cannot rely on the rest of the world to feed us, clothe us, build our houses and heat and light them. Any timber that we use will have to come from somewhere else and this will inevitably put pressure on more valuable woodland habitats such as rainforest. How can it be acceptable to decrying deforestation in Indonesia and the Amazon and at the same time promoting it here?</p>
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>The need to reduce carbon emissions must take priority.</p> <p>See all of the above.</p>
	<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?
Yes.	<p>Firstly in this policy open habitats are being looked at completely out of context. they are only being considered in relation to woodland. This is a nonsense, effectively any land that is not under woodland or development is an open habitat in which case the area of open habitat far exceeds the area of woodland.</p> <p>Whilst we accept that the need to conserve our existing special habitats and that these may need continued long term funding to achieve, we need to be pragmatic in our approach to the management of our other land. Rather than having land that is productive but has little or no ecological value and land that has high ecological value but is totally unproductive we need to find ways that optimise both its productive and environmental value.</p> <p>We need to recognise that in some cases existing woodland management practices already provide the conditions for many open habitat species eg clearfelling of pine in Thetford and that other practices such as CCF will also improve biodiversity for other species.</p>

No	Question.
	<p>We must also recognise that some of the impacts of climate change will be that some habitats and species will not survive, or not at the same level or location and that the impacts of climate change may well require us to change our land management practices.</p>
18.	<p>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>
	<p>We must make mitigating climate change our over-riding objective and then adopt the precautionary principle when looking at ways to adapt to it.</p> <p>for the time being we should maintain the conservation objectives on SSSI's but investigate whether there are other more sustainable and cost effective ways of meeting those objectives.</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.	<p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>
<p>See the EFIP study</p> <p>See the Open Habitats and open habitats potential on the Forestry Commission \public Estate In England.</p> <p>See the EFIP response to this consultation which we fully support and endorse.</p> <p>Given all of the above and the role that forests and the products that they produce can play in climate change mitigation this is almost an obscene question. what we should be doing is looking where and how we can increase our productive woodland cover not considering how much deforestation we can get away with.</p> <p>In the medium to longterm we will need more timber not less and we need to be planting this now so that it will be available for the market when we require it.</p>	
<p>Different approaches to applying policy</p>	
20.	<p>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>
<p>Decisions should be criteria based not target focussed, however of the three options offered only option one is sustainable, if we cannot be sure that the land will managed in the long-term for whatever reason then the deforestation and open habitat creat will not fulfill its objectives and all of the benefits that the woodland could have produced will have been forgone for no gains.</p> <p>See answers above.</p>	
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
<p>See answers above especially in question 11.</p>	

No	Question.
	<p>Compensatory habitat creation is already a recognised measure in habitat protection and should be extended to cover the complete range of ecosystem services that woodland provides. This could take the form of a "Bank" into which compensatory payments for deforestation were made which could then be used to incentivised compensatory planting in other locations. this could also be used to cover compensatory planting as a result of deforestation for other reasons such as development.</p> <p>The CLA is already exploring this idea as one way of delivering Environmental Markets and this would also tie in with potential carbon markets.</p> <p>The CLA would be happy to discuss this further with the Forestry Commission, Defra and Natural England.</p>
<p>Factors to consider when deciding which policy is likely to work best</p>	
22.	<p>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>
No	<p>Your questions are perfectly ok for the arena in which you have approached this issue however you have completely failed to grasp the importance of the wider issues especially those raised by climate change. Things have moved on, this is really yesterdays policy. What we should be considering is not where we can allow deforestation but where we can encourage afforestation i.e. the replacement of open habitats with woodland, and how we can maximise the benefits of that woodland so that it produces the optimum mix of ecosystem services.</p>
<p>Implications for delivery mechanisms</p>	
23.	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>
	<p>The main thing about this policy in its present form especially if it remains target focussed is that objectives are set nationally but the impacts are very much felt regionally, at county level and even at parish level where for example a potential supply of local woodfuel for a community heating system can be lost forever by the removal of an area of woodland. The East of England for instance could bear the brunt of the deforestation and in Norfolk the amount of woodland lost already exceeds the amount of new planting. In the East of England the timber from the FC at Thetford underpins the three main softwood processors in the region. the presence of three sawmills ensures a competitive market for timber and allows the supports the growers in the private sector. If their long term timber supply is threatened then they will not reinvest and may well close. they are based in the east of the region so it would be very expensive to bring in roundwood from further west. in fact they are more likely to follow the hardwood mills and import timber off the docks and just resell it, which is surely not something we should be supporting.</p>
<p>Other comments</p>	
<p>We welcome your input on any other aspect of this consultation.</p> <p>We commend the Forestry Commission on the delivery of this consultation and on commissioning the evidence studies which will have helped to inform</p>	

No	Question.
	consultees responses. We hope you also take note of the evidence in those studies. We hope the the FC has the courage to maintain the quality of this process by keeping the consultees informed and involved in the process before it becomes fixed in policy.

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.