

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:	Adam Corbin
Your organisation (if any):	None
Date:	21 st 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?
	None. Forestry as a land use currently either stores or embodies significant amounts of carbon, a vital part of the fight against climate change. Granted some of these areas are not originally forested and their conversion into forest use may have contributed to greenhouse gas (GHG) emissions in the past, however reversion is not going to put those gasses back. What is done is done, lets make the most of a bad job and continue forest operations.
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
	Particularly agree with first point. The 'carbon balance' section should read: 'Woods and forests continue to make A VITAL contribution to the UK Government's commitments for reducing carbon emissions.'
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?
	The carbon balance section should ensure that any project which goes ahead is at worst carbon neutral and at best creates a positive balance of embodied carbon. The use of fossil fuels in re-instatement may be considerable, it is vital that ALL the carbon costs are accounted for, from cradle to grave.

No	Question.
Loss of woodland biodiversity needs clear and measurable indicators.	
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?
Yes- however we have already got a rural mosaic landscape, time, money and effort would be better spent improving farm woodlands and the mutual beneficiality between pasture habitat and such woodlands.	
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'?
100% yes, why not immature native woodland?	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
Why not all native woodland, particularly thinking of broadleaf, considerable resource and grant aid is likely to have gone into such projects, is it really worth throwing away?	
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 participation is vital, however the debate needs to be informed, not hijacked by environmental pressure groups and those with hidden agendas. Point 3 would seem most appropriate: We could require initial stakeholder analysis and a commitment to proceed accordingly.	
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. Total waste of resources, if the environmental pressure groups wish to deforest an area, let them build the support; one doesn't bark when one has a dog. Then the proposals can be evaluated on a national and regional scale.	
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?

No	Question.
	Impose a framework.
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. See points 7 and 8 above, let environmental groups do the ground work, it is a waste of money for an organisation committed to afforestation and defence against climate change.
<p>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.</p>	
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?
	You should do more than just TRY! Any proposed deforestation projects should provide equivalent afforestation on a tree for tree basis. It is the trees that store the carbon, not the hectares.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	Far far 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?
	Wait for decisive evidence in favour of deforestation, the precautionary principal should apply here also.
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?
	See comments at point 3. Minimisation of carbon emissions is vital and should be a priority.
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, the whole life costs of the scheme need to be accounted for.

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?
See point 13. And we need to remember that carbon capture and storage IS the most effective tool against the decline in biodiversity, unless we halt climate change it is possible that all of our biodiversity will be wiped out in the next 50-100 years. Forestry is the last place which should be looked at for this sort of scheme.	
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?
Maintaining such open habitats has a cost, both in terms of carbon used and money. Such habitats were once maintained by a way of life, no synthetic process will ever come close to mimicking this 'natural' management effects. If we wish to see restoration and maintenance of such habitats, support should be given on some basis to restoration of this way of life.	
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?
See above. There is a concern here that too much energy and carbon is expended on such maintenance and crystallisation of what is actually a dynamic process of land use change, bought about by humans in the first place.	
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?
No.	
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?
Combined central control and making very very sure that land will be managed in the long term.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
Any advocates of deforestation in favour of these habitats should be bound to replace	

No	Question.
	woodland cover on a tree for tree or carbon equivalent basis, at their cost. Twinning is not acceptable as the goal of a net INCREASE in forested area is most desirable to mitigate the impacts of climate change.
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?
	Far too soft, you are the FORESTRY Commission, not the DEFORESTATION Commission. This is a matter of principal, and yet no questions are asked as to whether consultees agree with the principal of the proposal or not.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	<p>Section 6.5.5. 'Research and evidence' does not seem to include any research on the net carbon cost of these proposals.</p> <p>I do not think that any projects of deforestation should be funded by the existing or future FC funded schemes. If EN want it, they can pay for it - all, including mandatory afforestation in mitigation.</p>
Other comments	
	We welcome your input on any other aspect of this consultation.
<p>Please note your mission statement:</p> <p>'Our mission is to protect and expand Britain's forests and woodlands and increase their value to society and the environment.'</p> <p>Surely this says it all....</p>	

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.