

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:	Ed Dyson
Your organisation (if any):	The Deer Initiative
Date:	5 June 2009

No	Question.
The nature of the change	
1.	<p>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> <p>We and many of our Partners and wider stakeholders have been and remain committed to woodland expansion. Even a policy for remaining static would not be acceptable. FC England's Public Opinion of Forestry 2007 states that 71% of the general public surveyed expected to see more woodland creation, even in wide open spaces such as in the uplands. Public money has been spent on awareness raising initiatives to promote the concept of sustainable forest management in light of climate change obligations. Anecdotal evidence suggests that even non-forestry public bodies are keen to continue to support and promote this concept.</p> <p>We do however accept that there are plantations that would be best removed for habitat restoration, but suggest that each site should be considered on its merits within a framework of relevant parameters. Taking into consideration the woodland removal that has taken place over the last decade and more any further area of woodland that is deemed unarguably better to be removed must be minimal.</p> <p>Depending on the nature of the woodland in question, and the species of deer, restoration to open habitat could conceivably have either negative or positive effects on the ability of the area to support deer. While it is difficult to say what the overall effect might be in terms of deer numbers in England, the impacts on deer management (which could either positive or negative depending on the specific nature of the change) are likely to be more significant on the local/regional scales.</p>
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish

No	Question.
	to suggest any amendments?
	<p>From the point of view of sustainable deer management, the proposed desired outcomes seem reasonable. However, both native and non-native species of deer are likely to respond to local changes in habitat resulting from open habitat restoration and there is little evidence available as to potential impacts on remaining woodland (See Q 11). The responses (for example in distribution, density, and local impacts on forestry, agriculture and natural habitat) are hard to predict, but are likely to affect two of the desired outcomes in particular on a local/regional scale: the nature of ecological communities, and trends in woodland biodiversity.</p>
<p>Measuring the success of the policy</p>	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
	No comment
<p>Policy proposals</p>	
<p>Elements present in the policy</p>	
<p>We will treat woodland and open habitats as potentially mutually beneficial</p>	
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>Deer use a wide range of habitat, including woodland edges and transitional habitat which gives them access to different foraging and sheltering resources. Individuals especially of the larger species tend to range over areas larger than the average landholding. These factors mean that the interaction of habitat types is especially important for deer and deer management.</p>
<p>A presumption against removal of 'mature native woodland'</p>	
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'?
	Acceptable.
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
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. Evidence of high quality local engagement must be provided with any proposal for deforestation. We would hope that insofar as any specific proposal may affect deer management, local interests would be consulted, including the local Deer Management Group where it exists.</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?
For large wild mammals such as deer, we support the principle of local, collaborative land use management. It would be appropriate for woodland removal to have a regional or local element in order to take account of local impacts and needs.	
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?
Full guidance on evaluation must be provided. Although any policy will be aligned with the timescales of ETWF (10-15 years) an annual reporting schedule should be put in place to monitor its effectiveness. The results should be used to inform a three-yearly policy review.	
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?
No comment	
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?
Yes. We believe that any threshold of deforestation must ensure that there is no net loss of woodland cover in England, already one of the lowest coverages in Europe. As there is apparently no compiled record of woodland removal from land and building developments then it is essential that deforestation is kept to a minimum. We would also wish to see not only a national and regional threshold but the evaluation process may identify local areas where planting combined with deer management is essential to ensure that there are no unacceptable impacts from wild deer (and wild boar) on other habitats.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
No comment	
Key variables What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?	

No	Question.
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?
No comment	
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?
No comment	
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?
No comment	
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?
No comment	
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?
This proposed change to a more dynamic attitude is attractive - but extremely difficult to monitor, however it may be possible if practiced at a landscape scale. The use of more indirect monitoring; such as the Woodland Bird Index does make this a possibility but there is a real risk that it might make it extremely difficult to ensure that landowners and managers comply with their statutory obligations.	
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	
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?
n/a	

No	Question.
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?
We support the principle that key open habitats be restored where the benefits outweigh the environmental and social costs, but emphasise the need for implementation to be sensitive to habitat and wildlife interactions at the local level.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
No comment	
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?
We are content with the questions and we believe that the proposed questions most relevant to deer management are "Will practitioners be allowed flexibility to take account of specific woodland biodiversity requirements?" (Woodland biodiversity) and "Does policy promote high quality local participation in decision making?" (Local engagement).	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Activities such as removal of forests, compensatory planting, manipulation of natural and artificial boundaries (such as fencing) and so on could have local effects on deer distribution, movement and impacts on forestry, agriculture and the natural environment. As such there may be local impacts (positive or negative) on deer management issues, and this should not be overlooked.	
Other comments	
We welcome your input on any other aspect of this consultation.	
The DI Partners' principal concerns were that impacts on the management of large wild mammals such as deer and boar would not be overlooked in the planning and implementation of the Open Habitats policy. Other significant concerns were about the wider implications of deforestation in the context of climate change and efforts to raise public awareness about the role that sustainable forestry should play.	

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.