

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:	Craig Dixon
Your organisation (if any):	Devon County Council (Environment, Economy and Culture Directorate)
Date:	4 June 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>From a nature conservation perspective alone, it is likely that the 'higher' level of restoration or expansion would be preferable (especially assuming that most of the clearance will be of non-native species), though it would still need to be focussed and targeted. However, there are good reasons for ensuring that the rate of deforestation is such that net deforestation is avoided, including potential negative impacts on the forestry industry. Therefore, as a general guideline your 'middle' level of restoration may be appropriate, as that would avoid net loss. That said, there should still be flexibility in the policy to allow for exceptions.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>DCC generally supports the listed desired outcomes, especially those relating to ecological communities (the primary outcome of the policy) and woodland biodiversity.</p> <p>However, there is no mention in the desired outcomes of protecting and enhancing the historic landscape and archaeological/historic features. As pointed out in Section 4, the policy would have implications for such features, potentially both positive and negative.</p>	

No	Question.
	<p>The English Heritage 'Monuments at Risk' survey could be easily included, although it does not include unscheduled monuments, which are far more numerous than scheduled monuments and many of which are of national importance.</p> <p>ETWF theme: page 16. Learning about landscape history states that 'a historic landscape will be restored' – but it is important to state that historic features including relict field boundaries, etc, need to be preserved and protected during any associated felling operations.</p> <p>Preservation of the historic environment includes potential for both damage and improvement. Improvement comes not just from the improved setting of the historic feature, but also from reducing risk of physical damage from root growth and tree throw (as well as harvesting operations). It is important that areas are properly assessed for Historic Environment features (which may have been masked by the tree canopy until now) at an early stage, as well as following guidelines. New techniques such as LiDAR are particularly helpful at identifying archaeological remains below the canopy.</p>
<p>Measuring the success of the policy</p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
<p>Regarding 'ecological communities able to cope with threats', the the indicators seem appropriate and the inclusion of 'trends in populations of UKBAP species associated with woodland habitats' is especially welcome.</p> <p>Additional indicators relating to the historic environment could include: (a) Improved condition of monuments, (b) Restoration of former Historic Landscape Character, where appropriate and (c) Improved access to monuments.</p>	
<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.	<p>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>
<p>Yes, woodland and open habitats are potentially mutually beneficial (transition zones, landscape complexity, etc.). However, this can be dependent upon the scale of the two habitat types, and there will be situations where large areas of woodland need to be removed to enable economies of scale and also to facilitate future management of open habitats (including dealing with the issue of seed-fall). There needs to be an element of judgement on a case-by-case basis.</p>	
<p>A presumption against removal of 'mature native woodland'</p>	
5.	<p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>

No	Question.
	Yes, though there needs to be some flexibility with respect to 'mature native woodland'. There may be exceptional cases when the benefits or felling mature (not ancient) woodland outweigh the undoubted costs - perhaps, for example, when felling a small block of woodland would enable important habitat connectivity.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
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?
	Yes, definitely. It will usually be important to include stakeholders at an early stage. It would be sensible for the nature of the consultation required to be appropriate to the scale and impact of the project.
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>This would allow for Historic Landscape Character to be taken into account, in consultation with Local Authority archaeologists (and, where appropriate, English Heritage).</p> <p>There is a new framework for the delivery of the England Biodiversity Strategy, which includes reference to the development of regional priorities for landscape-scale conservation. Prioritisation should engage with this framework, where appropriate, and also with other targeting mechanisms such as the South West Nature Map.</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?
	Evaluation of the success of projects will be important.
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?
	Guidance from the FC, taking into account the likely requirement of funding bodies, would be helpful (option 4).
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

No	Question.
	applied to policy?
	<p>There does need to be a means of ensuring that there is no net reduction in woodland cover and, indeed, preferably a continued expansion of native woodland for biodiversity and other ecosystem services. There may also be a sustainability case for expanding non-native cover where it meets a need and does not impact on present or future nature conservation objectives. Whilst compensatory planting could have significant financial implications for restoration projects it might be appropriate to require it if the threshold is reached within a certain time period. However, there would need to be the flexibility to still allow important projects where there are constraints to compensatory planting (and where the project may need to go ahead in the short-term, perhaps due to funding opportunities). Allowing natural regeneration of woodland may help to reduce the cost burden.</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	<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?
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?
	<p>Minimising emissions by reducing soil disturbance or not removing stumps may often also constitute best practice for historic environment features (though this may sometimes conflict with the habitat restoration objectives - another reason for early consultation).</p>
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?
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 balance may shift in favour of biodiversity objectives if based on a range of criteria, including number of NERC S 41 species/habitats concerned; linking/connectivity/buffering existing sites; scale of woodland removal and context, and where the project would achieve multiple objectives, including a range of ecosystem services and other considerations such as the historic environment. Again, there is a need for early</p>

No	Question.
	consultation.
<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.	<p>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>
<p>A dynamic approach would also need to take account of other considerations such as the historic environment, but there may well be a case for it on some large sites as there is evidence that dynamism, habitat and structural variety and appropriate levels of disturbance can be beneficial for much biodiversity. It may also help to address landscape and recreation considerations. The sites would need to be large and judged on a case by case basis, in the light of the project objectives.</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>Large scale, very extensive long-term management allowing natural processes and delivering ecosystem services may be appropriate in some cases. Management plans and targets would need to be flexible and the outcomes could not be accurately predicted.</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>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>The three approaches are not mutually exclusive but can form a hierarchy of prioritisation should funding be a limiting factor. Again, however, there is a need for flexibility. Generally, the urgent priority will be to maintain the open habitats that we have, though buffering, expanding and linking these, and creating new stepping stones is also of significant importance if we are to create a robust landscape capable of facing the challenges ahead. Again, assessments will need to be made on a case by case basis.</p>	
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
<p>There should be a presumption that any compensatory planting associated with biodiversity enhancement projects should be of appropriate native species. Whilst the role of compensatory planting should be to ensure no net loss of woodland or the availability of woodland products, it should take into account the wider picture (at least</p>	

No	Question.
	<p>regionally) and not necessarily result in an additional burden on individual projects.</p> <p>In addition, any areas for woodland creation should be appropriately targeted so as to fit with the Historic Landscape and avoid areas of archaeological and nature conservation sensitivity - planning at an early stage would be important.</p> <p>There is scope for compensatory planting of high production conifers on certain types of land such as improved grassland or arable.</p>
<p>Factors to consider when deciding which policy is likely to work best</p>	
<p>22.</p>	<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>
<p>Implications for delivery mechanisms</p>	
<p>23.</p>	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p> <p>Public Funding through Higher Level Stewardship should in theory protect Historic Environment feature as this is a multi-objective scheme, so this is welcomed. Thought may need to be given to the likelihood of funding continuing past the 10 year initial agreement.</p>
<p>Other comments</p>	
<p>We welcome your input on any other aspect of this consultation.</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.