

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:	Alison Turnock
Your organisation (if any):	Dorset Area of Outstanding Natural Beauty
Date:	May 8 th 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>Given that the current rate of restoration is 500 ha per year (table 2), and it has not been suggested anywhere that this is too low, it is considered that the range should be 500-3,000 ha per annum. It is unclear why the timescale ranges from 10-15 years - this is quite a variation. It is suggested that the target should be based on HAP targets as these have been nationally agreed. FC should lead the way with their own estate, and restoration should be phased with harvesting of mature timber. New sites for woodland creation should be sought to ensure that there is no net deforestation.</p> <p>The administration cost of 20% seems a high figure, and there does not appear to be an explanation as to why this is so.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Yes but see below for amendments</p> <p>Table 4: avoiding net deforestation: if the replacement rate is increased in line with the rate of forest removal, there would be no net deforestation</p> <p>Table 4: climate change, carbon balance: consideration should also be given to the impact of restoration of wet sites which could provide a positive contribution to the carbon balance.</p> <p>Table 4: quality of life and landscape / learning about landscape history / preservation of historic environment: this could have a positive impact through restoring landscape character, and resulting in better management of historic sites</p>	

No	Question.
	<p>Table 4: business and markets: there will be a short term gain as trees are removed. Once the open habitats are created, they will continue to require management and this should be taken into account.</p> <p>Table 5: desired outcomes</p> <p>Carbon balance: peat bogs can make a big contribution to reducing carbon</p> <p>Timber sector activity: it is felt that "economic activity" would be a better heading, and that this should include the economic benefits from open habitats. The policy should aim to retain current rates of timber production. As restoration is undertaken, there will also be an increase in timber availability over the next 10-15 years, depending upon which target is adopted.</p> <p>Woodland biodiversity should just be called biodiversity, as there will be benefits to species associated with open habitats, and the outcome should be delivering FC obligations to deliver UK BAP targets.</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>In general a reasonable set of indicators. A few detailed comments:</p> <p>Ecological communities: yes, and a measure of fragmentation / connectivity would be helpful</p> <p>Positive engagement by users: add in a measure of access / recreational use (this may be desirable on sites other than heathland, where access is an aim). Measure engagement through the level of preconsultation undertaken? i.e. assess the process being used.</p> <p>Carbon balance: add in contribution to renewable energy targets through harvested timber</p> <p>Timber sector activity: rename "economic activity"</p> <p>Woodland biodiversity: rename "biodiversity" (see Q 2).</p> <p>Add in a landscape indicator e.g. national monitoring methods through countryside quality counts</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. Proposals should be based on landscape character, biodiversity and impact assessments. This approach should not be used as a reason for aiming at the bare minimum to achieve targets.</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</p>

No	Question.
	of ancient and 'mature native woodland'?
	Yes ancient woodland should be retained. There may be exceptional cases for removal of mature native plantation woodland.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	Clear definition
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. A combination of 1 and 4 would be helpful - the level of engagement will depend on the population adjacent to the proposed site.
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 - regional prioritisation will be helpful in determining which regions have the best opportunity for restoring open habitats. However local stake holders and delivery mechanisms should be involved at a local level to maximise delivery. A regional appraisal mechanism could determine which sites are selected based on local consultation.
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?
	Yes - a combination of 2 and 4 would be helpful. Figure 2. It would be helpful to explain the framework diagram to explain what each stage represents. It needs to be user friendly so it can be used in public consultation and the public can clearly see how the process works.
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?
	Support should be available but the process should also use existing local delivery mechanisms such as Dorset Woodlink.
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?

No	Question.
	<p>A threshold is unhelpful. The policy should establish what restoration is needed based on BAP responsibilities (see answer to Q1). The rate of planting should be adjusted to ensure no net deforestation, and ideally result in an increase in woodland cover.</p> <p>The Dorset Woodland strategy has identified a policy of no net loss of woodland, even taking into consideration the large areas of forested heaths which it is proposed to be restored to heathland. It takes a landscape character approach and can be found at (couldn't find link on website?)</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	See above
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 habitats?
	It would not be cost effective to address this accurately. As each site is restored, a monitoring programme should be developed and the results used to estimate the contribution to biodiversity.
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. Arisings can be used for wood fuel, and trees should generally be felled when economically mature. Best practice should be promoted. Local initiatives should be supported such as Woodlink which gets practioners to work together an develops networks to encourage use of wood fuel.
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. This will depend upon the rate of replanting (see Q1). Benefits from rewetted sites should be included, and improving the carbon balance should be used as an argument for planting more trees in appropriate sites.
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?
	These need not be mututally exclusive if replanting balances restoration of open habtiats (see Q1).

No	Question.
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?
Agree that a dynamic approach is helpful, however we would prefer a 30% rotational woodland, 10% permanent woodland and 60% open habitat (which would include trees)	
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?
No - there should be a differentiation between nationally designated sites which will need to take priority if 2010 targets are to be met.	
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?
<p>The question should be what level of woodland expansion is needed to maintain the timber industry?</p> <p>In the short term, restoration and maintenance will provide significant amounts of timber to the timber industry. Additional planting should be undertaken to ensure a continued supply. This could result in benefits to the economic sector.</p>	
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?
See answer to Q1. 6.3.2. is the best option, but it should be backed up by a commitment to additional planting.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
A balanced strategy should be developed which adjust replanting targets depending upon rates of removal. These should not be via a compensatory mechanism which would be restrictive and difficult to implement - replanting could occur in a different part of a county or region. (see Q11)	
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?

No	Question.
	Appears to repeat earlier questions.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	Not aware of any implications missed out.
Other comments	
We welcome your input on any other aspect of this consultation.	
<p>Restoring and expanding open habitats from woods and forests in England: a consultation</p> <p>Thank you for consulting the Dorset AONB on this document. A number of general comments are given below.</p> <p>General comments</p> <p>The premise of restoring and expanding open habitats from woods and forests is welcomed. However, the document seems to have been produced with the aim of encouraging respondents to support a target of restoring 1,100 Ha per year, and the information provided and questions appear to take the reader down that path.</p> <p>It would have been more logical to take as a starting point the requirement for creating open habitats based on HAP targets, as these have been agreed by a wide partnership of organisations and provide a target to aim towards. From section 4.1, this would appear to lead to a goal of 3,000 Ha per year woodland removal. However, it is also agreed that the policy should not result in deforestation – as stated in the document, woodland cover in England is relatively low. It is not clear why there could not be an aim of planting an equivalent amount of woodland elsewhere, not as “compensatory” planting, but as a target to work to in partnership with other organisations and landowners. An increase in woodland cover could even be aimed at, which if planted with appropriate species would provide benefits in terms of biodiversity, recreation, landscape and economics. For example, Woodlink in Dorset has been working with landowners to manage woodlands and link this with an economic return through use for wood fuel, and encourage planting of new woodlands in appropriate locations based on landscape and habitat assessments (Tom can you reword if this is incorrect?).</p> <p>It would also be more helpful if this policy document were to be fully integrated into “A strategy for trees, woodlands and forests” – this would assist in the provision of a clearer vision of what is being aimed at and why from a biodiversity perspective as well as a forestry one.</p>	

No	Question.
<p>Questions contained in the document have been answered on the appropriate form.</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.