

# 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](http://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](http://www.forestry.gov.uk/england-openhabitats-consultation).

<b>Your name:</b>	Imogen Davenport
<b>Your organisation (if any):</b>	Dorset Wildlife Trust
<b>Date:</b>	5/6/09

No	Question.
<b>The nature of the change</b>	
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>Dorset Wildlife Trust (DWT) endorses the detailed responses (on all questions) made by The Wildlife Trusts, Dr Lesley Haskins and East Dorset Environment Theme Action Group. This brief response is made to re-iterate some of the points from a Dorset point of view.</p> <p>The absolute minimum level of removal of trees to restore open habitats should be that which is required to meet Biodiversity Action Plan targets. If we do not take this step then it will be impossible to get any way towards our national and international target to halt the decline in biodiversity.</p>	
<b>Desired outcomes</b>	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
Meeting UK, England, Regional and Local BAP targets should also be included	
<b>Measuring the success of the policy</b>	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
The outcome listed in 5.1 relates to trends in key species (NERC s41 species) whereas the indicator relates to loss of established native woodland whether or not this enhances biodiversity. The measure should be re-written as a biodiversity indicator including amount of BAP habitat restored as a result of tree removal.	

No	Question.
<b>Policy proposals</b>	
<b>Elements present in the policy</b>	
<b>We will treat woodland and open habitats as potentially mutually beneficial</b>	
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, based on the direction the question is leading – ie towards patches of open habitat within continued monoculture dense conifer plantations. We agree that a vision of open habitats which are not totally treeless would provide a picture which is more realistic of landscape-scale conservation aspirations, but we would want to see these trees and wooded areas adding to biodiversity rather than being remnants of old style forestry which offer little biodiversity benefit and fragment and isolate other habitats.	
<b>A presumption against removal of 'mature native woodland'</b>	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
We support a presumption (and stronger) against ancient woodland removal, but with secondary woodland there needs to be more flexibility to allow for differing circumstances. The text mentions "relatively biodiverse native woodland" – presumably this is relative to dense conifer plantations but may well not be relatively biodiverse compared with the open habitats potentially restored. In most cases removal of mature broadleaved woodland would be difficult and costly and thus it would only be contemplated in areas where there is good reason to - eg restoration of fully functioning mire systems.	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
We do not feel it is helpful to set a tight definition in this way. Lowland heathlands date back to early clearances in the Bronze Age and their restoration should be given just as much priority as retention and restoration of Ancient Woodland.	
<b>We will expect practitioners to help local users to participate in development of the initial proposals</b>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
A rigid prescription for consultation will not be helpful – the appropriate methods depend on local circumstances. Guidance (option 4) would be helpful. Local sensitivity is required and the right information being prepared and circulated at the right time. The principles set out by Dr Haskins in her response should be adopted.	
<b>We will promote mechanisms for prioritising woodland removal at a regional level</b>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
National BAP priorities should be used to target action - otherwise there is a danger that regions with less biodiversity potential will receive resources better spent elsewhere. But	

No	Question.
	sub-regional targeting (eg at a level of SE Dorset Heathlands) is also required.
<b>We will apply a framework for evaluation to projects</b>	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?
It would need to be framed in a much more user-friendly way to encourage landowners to propose restoration of open habitats rather than out them off.	
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?
The Forestry Commission should set up a programme to enable them to carry out monitoring and evaluation to inform the future development of the policy rather than	
<b>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.</b>	
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?
It is very negative to suggest that species-poor conifer plantations should be retained at the expense of meeting biodiversity targets. Instead we should be trying to meet both biodiversity and woodland cover targets with expansion of planting of native woodlands in appropriate places. So the answer to the questions is there should be no threshold – instead positive targets should be set.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
There should be no threshold as set out above - there should be targets for restoration of BAP habitats and targets for creation of new native woodland at an an equivalent rate and in appropriate places.	
<b>Key variables</b> <b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b>	
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?
Much better account needs to be made of the contribution of habitats such as heathland to carbon sequestration - the presumption seems to be that open habitats provide no contribution and this is incorrect.	
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

No	Question.
	adopted?
	Management practices to reduce carbon emissions should be used throughout within a framework of meeting BAP targets - and the carbon costs of timber production, transport, processing etc be taken into account as well.
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 - see Qs 16 and 19	
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?
	We should be doing both so there is no 'balance' needed here. The question arises as to what the difference is in CO2 equivalents stored between different types of woodland – eg conifer monoculture versus broadleaved / native woodland which would be encouraged in planting schemes.
<b>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</b>	
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?
	There is a valid question about rigid National Vegetation Assessment-based condition assessments - we are looking for BAP priority habitat to be restored rather than a specific category of community. However the emphasis is on BAP priority habitat - this should not excuse the retention of species poor conifer blocks.
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 Q17	
<b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b>	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
	In reality the removal of inappropriate woodland can and should increase the supply to the wood fuel market over a timescale when the supply from sustainable woodland management will be built up to fill any gap. If managing open habitats is indeed that much more expensive then this implies it will create more jobs than are lost - this should be taken into account.

No	Question.
<b>Different approaches to applying policy</b>	
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?
Decisions should be made based on Biodiversity Action Plan priorities. Dr Haskins' response provides a well set out summary of the policy approach which should be taken.	
<b>The role of compensatory planting</b>	
21.	What is the appropriate role of compensatory planting in this policy?
<p>The two issues should be kept separate – an equivalent policy document for woodland expansion, targeted in the right places, is needed. Insisting on compensatory planting for every removal project will result in trees being planted in the wrong place (eg on other important open habitats) just because the applicant cannot find any suitable site at the time. At the most a requirement to pay into a fund which gives grants for planting could be imposed.</p> <p>Links to the Green Infrastructure agenda and the role of developer contributions in funding woodland creation and management have not been taken into account.</p>	
<b>Factors to consider when deciding which policy is likely to work best</b>	
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?
The burden question pre-supposes that there will be an additional cost to government and the carbon balance question pre-supposes there is a negative outcome - both need to be re-worded.	
<b>Implications for delivery mechanisms</b>	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
A grant mechanism to allow removal of trees which were planted on priority habitats with public money is needed. There are a number of plantations which serve no biodiversity or landscape value, being dense conifer, planted on former heathland, chalk grassland or other habitats (including sites which were recognised Local Wildlife Sites) using either FC grants or local council grants. It would be really helpful to be able to acknowledge that these trees are in the wrong place and remove them before they get to maturity.	
<b>Other comments</b>	
We welcome your input on any other aspect of this consultation.	

Please include the “information about you” form with your response.<sup>1</sup>

<sup>1</sup> See [www.forestry.gov.uk/england-openhabitats-consultation](http://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.**