

# 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>	Tom Munro
<b>Your organisation (if any):</b>	Dorset Woodlink
<b>Date:</b>	May 28 <sup>th</sup> 2009

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>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 at the higher end of 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 economically 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>	
<b>Desired outcomes</b>	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>The list is reasonable but we'd like to suggest some 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. Rather than balance the removal of trees with a fixed allocation for planting through EWGS, Dorset Woodlink would encourage fixing the removal rate in line with an increased EWGS planting rate.</p> <p>Table 4: climate change, carbon balance: consideration should also be given to the impact of restoration of wet sites which would provide a positive contribution to the carbon balance. Re-wetting sites formerly drained for forestry would create a good, long-term carbon sink</p>	

No	Question.
	<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> <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>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. Additionally, over the medium term while the open habitats policy is being enacted, we believe there will be an increase in timber availability as wooded habitats are felled. Likewise, there is likely to be an increase in the 10-15 year future for forestry businesses engaged in the felling and processing of this timber.</p> <p>'Woodland biodiversity' should just be called biodiversity. Woodland biodiversity is likely to suffer, while the biodiversity of open habitats will benefit - and therefore some qualitative analysis of the relative worth of the two groups needs to be established - rather than setting the system up to report negatively on this aspect.</p>
<p><b>Measuring the success of the policy</b></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 this is a reasonable set of indicators, however a few of the indicators seem chosen deliberately to show the negative impacts of enacting this policy, whereas with a few changes they can incorporate the positives brought about by open habitat restoration. Some specifics:</p> <p>Ecological communities: 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). Another suitable measure for engagement would be the level of preconsultation undertaken - i.e. assess the engagement process and re-adjust methods if necessary.</p> <p>Carbon balance: add in contribution to renewable energy targets through harvested timber entering the woodfuel sector</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 (or its successor)</p>
<p><b>Policy proposals</b></p>	
<p><b>Elements present in the policy</b></p>	
<p><b>We will treat woodland and open habitats as potentially mutually beneficial</b></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</p>	

No	Question.
	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.
<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'?
	Yes, ancient woodland should be retained. There may be exceptional cases for removal of mature native plantation woodland although it is unlikely to be a priority.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	We support this definition
<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?
	Yes. A combination of 1 and 4 would be helpful (ie insisting on high-quality engagement but providing the tools and encouragement to facilitate this). However, the level of engagement will depend on the population adjacent to the proposed site - for instance, open habitat clearance in the peri-urban Dorset Heaths would require more consultation than for the clearance of a forestry plantation in an uninhabited and little-accessed site.
<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?
	Yes. Local initiatives such as Dorset Wodlink could, if adequately resourced, assist with the process.
<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?
	<p>Yes - a combination of 2 (ie as a condition of funding) and 4 (providing assistance to achieve it) would be helpful.</p> <p>Figure 2. This framework is unclear, and is more a representation of the whole policy-development process than the evaluation process (which is summed up in the 'did it work' box).</p> <p>It would be helpful to modify 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.</p>
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	Question.
	<p>We believe the framework should be modified first - then support should be available in the form of print/web guidance and some funding of local advisory networks such as Dorset Woodlink to be able to provide some locally-applicable, on-site advice.</p>
	<p><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></p>
11.	<p>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?</p>
	<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. Based on this strategy, Woodlink is developing some spatial guidance based on landscape-character which will show planting opportunity areas.</p>
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
	<p>See above</p>
	<p><b>Key variables</b></p> <p><b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b></p>
13.	<p>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?</p>
	<p>It would not be cost effective to address this accurately. As each site is restored, some monitoring should be undertaken and the results used to estimate the contribution to biodiversity.</p>
14.	<p>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>
	<p>To the first two parts: yes, we agree. As to how it can be achieved:</p> <p>Burning of brash is to be discouraged.</p> <p>A 'whole tree harvest' approach should be encouraged, diverting those parts not of saw log quality to the woodfuel chain.</p> <p>Felling of trees when economically mature would ensure greatest 'carbon harvest'</p> <p>Best practice should be promoted. Local initiatives such as Dorset Woodlink would be the ideal bodies for providing such promotion.</p>

No	Question.
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. If there is adequate planting, there will be no loss of potential to substitute timber for higher carbon materials and fuel.	
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 mutually exclusive if replanting balances restoration of open habitats (see Q1). Additionally, the fact that 'most people believe' that trees play a positive role in combatting climate change does not mean that there is substantial quantified proof of their relative benefits over non-wooded habitats. While we believe woodlands do offer benefits over cultivated land, the relative benefits between forests and peat-accumulating habitats (e.g. those on podzolic soils and mires) are more difficult to determine.	
<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?
Agree that a dynamic approach is helpful, however we would prefer targets of 30% rotational woodland, 10% permanent woodland and 60% open habitat (which need not be entirely tree-less)	
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.	
<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?
The question can be inverted to ask "what level of woodland expansion is needed to maintain the timber industry?"  In the short term, restoration and maintenance will provide significant amounts of timber (and work) to the timber industry. Additional planting should be undertaken to ensure a continued supply. This could result in overall benefits to the economic sector.	
<b>Different approaches to applying policy</b>	

No	Question.
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?
<p>See answer to Q1.</p> <p>6.3.2. is the best option, but it should be backed up by a commitment to additional planting.</p>	
<b>The role of compensatory planting</b>	
21.	What is the appropriate role of compensatory planting in this policy?
<p>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)</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?
<p>An additional area to investigate - possibly under 'burden' - would be to evaluate the economic positives from open habitats.</p>	
<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?
<p>Not aware of any implications missed out.</p>	
<b>Other comments</b>	
<p>We welcome your input on any other aspect of this consultation.</p>	

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

**Please send your completed forms to:**

[Dominic Driver](#)

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

**By 17.00hrs, Friday 5 June 2009.**