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By email only
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Dear Dominic

Restoring and expanding open habitats from woodland and forests in England

Thank you for the opportunity to respond to this consultation. The East of England Biodiversity Forum (EEBF) is a liaison body of governmental and non-governmental organisations and groups involved in nature conservation, which provides a focus for furthering biodiversity in the region.

We have not attempted to answer all the consultation questions; simply those for which the EEBF has a remit and can claim some expertise.

Yours sincerely

Catherine Weightman
Regional Biodiversity Coordinator for the East of England

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?
No comment	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>The suggested "Woodland Biodiversity" outcome relates to "species of conservation concern" published under section 41 of the NERC act. This comprehensive list covers all the semi-natural habitats and more than 900 species. The EEBF is concerned that it will be difficult to judge the success of the policy against such large lists. For example, how would one judge the loss of firecrest habitat versus gain of Dartford warbler habitat?</p> <p>The EEBF was surprised that the "carbon balance" desired outcome implies that a net increase in carbon emissions as a result of this policy would be acceptable by stakeholders. The balance between biodiversity and carbon is a fine one, but if compensation planting is inherent in the policy (see response to Q21) then it should be possible to strike such a balance.</p>	
Measuring the success of the policy	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
<p>The EEBF has concerns about the indicator of "trends of populations of UKBAP species associated with open habitats" in that such trends may be affected by a number of variables, not solely the rate of open habitat restoration. We note, for example, that 15% (620ha) of existing heathland SSSIs are currently in unfavourable condition in the region, and improving these habitats could have more impact on key species than recreating 620ha from existing woodland.</p> <p>The EEBF believes that the commitment on "woodland cover" must be applied at the <u>regional</u> level (see response to Q11)</p>	
Policy proposals Elements present in the policy We will treat woodland and open habitats as potentially mutually beneficial	
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>The EEBF believes this to be the most important concept contained in the consultation. Mosaics of semi-natural habitats, containing niche habitats and a variety of eco-tones are most important for invertebrate, plant and bird communities in particular. The Forum was particularly impressed with the work of the Forestry Commission, RSPB and Suffolk Wildlife Trust at Dunwich Forest within the Suffolk Coast and Heaths AONB, where the intimate mix of high forest, wood pasture, heath and wet woodland maintains some locked up carbon in standing timber but also creating habitat suitable for species associated with open conditions on heathland. The EEBF advocates such an approach as the most sustainable balance</p>	

No	Question.
	between carbon and biodiversity and as the most sustainable means of managing such habitats and landscape in the future.
	A presumption against removal of 'mature native woodland'
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'?
	<p>The "at least 80 years old" criterion is a pragmatic approach. The EEBF does have some concerns with the ">70% closed canopy" criterion, which may inadvertently lead to loss of valuable developing wood pasture sites for example. We understand that the accepted definition of woodland is >20% canopy and it may be more appropriate to choose this.</p> <p>The EEBF is concerned that the definition of mature wet woodland has been unresolved. The East of England has some of the finest wet woodland in the country and a number of partners have formed the "East of England Wet Woodland Task Group" to ensure this "Cinderella" habitat is not overlooked. In many cases, wet woodland would "mature" in an ecological sense long before 80 years has elapsed. We would welcome the opportunity to engage in this issue.</p>
	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?
	No comment
	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>The EEBF warmly welcomes the proposal for developing a mechanism for prioritising woodland removal at the regional level. We are lucky in that we have a fully researched partnership study of opportunity mapping for heathland in the East of England (www.forestry.gov.uk/forestry/infd-7bbjff), but we have yet to develop such a comprehensive study for fen/ reedbed restoration that might affect wet woodland.</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?
	The EEBF has concerns about the apparent lineal nature of the framework. There should be more feedback loops and opportunities for applying learning.
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?

The EEBF has concerns about setting any threshold to avoid net deforestation at the national scale. As is noted in the "Open habitats and the FC estate in England" study by J W Spencer and R Edward, the variation in potential open habitat between English Regions is considerable and the majority by far, over 14,000ha, lies in the East of England. Setting a threshold at the national level may lead, for example, to net deforestation in the East of England, which we believe would not be acceptable to the majority of stakeholders, irrespective of any scientific merits. Instead, we would advocate that thresholds be set at the regional level, with an undertaking to avoid net deforestation at the regional level.

- 12.** Do you consider that the proposed threshold is about right, too high or too low?

The EEBF understands that grant aided woodland creation in the East of England is in the region of 150 – 200ha per annum, and that this might therefore represent the top end of any regional threshold.

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?

The EEBF acknowledges the difficulty of measuring the magnitude of the net benefit from given levels and types of open habitat restoration, and we welcome the undertaking to commission research in this area. Given the uncertainties the Forum would advocate a precautionary principle in setting threshold scales for such restoration work.

- 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?

The EEBF accepts that practitioners should seek to minimise carbon emissions during restoration. On larger scale or significant sites, such practices could be required as condition of Environmental Impact Assessment consents. On smaller sites it should prove possible to draw up best practice criteria, and the Forum would seek to engage its members in signing up to such a document.

- 15.** Do you agree that it is appropriate to include impact on long-term average carbon store *and* 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?

The EEBF acknowledges that the balance between biodiversity and carbon is a fine one, but if compensation planting is inherent in the policy (see response to Q21) then it should be possible to strike such a balance.

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?
Yes	
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?
The EEBF is broadly supportive of a dynamic approach to land management, allowing transient open space to be created, but we recognise that these are complex issues that probably need to be assessed on a site by site basis.	
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?
No comment	
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?
In seeking compromises with stakeholders it would seem inevitable that the approach to "ensure appropriate scale and pace of change" will find favour. However, the EEBF would urge that such an approach is applied at the regional, not national, level.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
The EEBF believes that compensatory planting could be a key tool in striking the balance between biodiversity, carbon and other benefits. Our Regional Spatial Strategy offers some an approach in stating, "The nature conservation and recreation value of woodland is recognised, and conversion to other land uses should be resisted unless there are overriding public and ecological benefits. Woodland unavoidably lost (to development) should be replaced with new woodland of at least equivalent area and composition, preferably in the same landscape unit".	
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 comment	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
No comment	

Other comments

We welcome your input on any other aspect of this consultation.

The EEBF welcomes the opportunity to respond to the Open Habitats consultation. In particular the EEBF welcomes the proposal for developing a mechanism for prioritising woodland removal at the regional level. As noted in our response, the EEBF has concerns about setting any threshold to avoid net deforestation at the national scale. Instead, we would advocate that thresholds be set at the regional level, with an undertaking to avoid net deforestation at the regional level.