

### **Question 1**

**Does your aspiration for the scale of the policy fit within our calculated range of 5600 to 30000 ha of restoration or expansion of open habitats from woodland or forest over 10 – 15 years. This is 370 to 3000 ha each year. What level of intervention would you prefer and how is this justified?**

We do not accept the premise of the question – namely that there should be a net loss of woodland area to open habitat. Apart for Ireland, England is the least wooded country in Europe, and targets should be set to increase the amount of woodland from the current 8% of land area.

There are considerable costs to removing trees from open habitat. There is the initial capital cost, then the loss of revenue. But in addition there is the opportunity cost – such as the loss of recreation potential timber revenue and the employment value that forestry brings. We are not convinced that the biodiversity benefit of creating more open habitat out of forestry has scientific foundation. There are Habitat Action Plans for woodland which conflict with the policy as set out here. In addition, forests and woodland are dynamic ecosystems which have open space in them as a natural part of their management system, e.g. rides, glades, part of the rotation system or open space in wet woodland or wood pasture. These already provide considerable 'open habitat benefits' but do not seem to be taken into account. The biodiversity benefits that are being assumed to accrue from creation of open habitat will depend very much on site specific circumstances and future management treatments which are not clearly specified in the proposals. The benefits could be achieved in other ways. The committee is also concerned that this is a forestry/open habitat policy. It should be a policy that looks at all land use, and not target the perceived soft target of forestry when the country already imports the majority of its timber needs. There is also a concern that there will be a disproportionate affect on the region because the majority of the open habitat target will be heathland, and there is a large amount of forestry on light land in the East of England.

There is also a false assumption that there is some sort of threshold whereby you can remove some land from forestry for open habitat and have no effect on the wider objectives of timber production, revenue, supply of saw logs, access and recreation etc. Any loss of land from forestry will impact on other objectives. The sort of integrated approach that this policy is seeking has already been achieved in the exemplary management of Thetford forest.

### **Question 2**

**Have we developed a reasonable list of desired outcomes of the policy. Do you wish to suggest any amendments?**

The policy should be looking at all land use – not just forestry. It should be concerned with the heterogeneity of all habitats.

Any change of forestry to heathland will result in access to grazed land (CROW Act). A key desired outcome missing is that there should not be a

loss of recreational potential or quality and no conflict between access and grazing.

### **Question 3**

**Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendment to this indicator list?**

There needs to be much more research and monitoring. There seems to be an assumption that increasing the amount of open habitat at the expense of forestry will deliver biodiversity benefits. But where is the research comparing existing open heathland with young plantation forestry on the same land, and on the effects on biodiversity of recent heathland restoration exercises? Open land then young plantation is, after all a normal stage in plantation forestry. Ecological communities as an indicator should not be included without substantiation. There appears to be a fixation on a static solution (i.e. perception of one particular desired outcome) to a dynamic system and environment.

### **Question 4**

**Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea useful in gaining support for open habitat restoration and expansion from woodland?**

The answer to this question depends on context and scale; it is a difficult concept to apply in a general way.

Forestry practice currently has considerable heterogeneity. When measuring habitat complexity and integration it is critical to be able to measure the horizontal and vertical complexity of the habitat. It is not about two dimensional landscape planning. It is not helpful to promote this idea without the specific regional and locational context. What would be helpful would be to promote the fact that forestry is a dynamic system which has open habitat as part of its natural cycle.

### **Question 5**

**Do you agree with the principle that there should be a presumption against removal of ancient and mature native woodland?**

We would add that the definition of mature woodland needs to be carefully considered in relation to wet woodland.

### **Question 6**

**What do you think of our proposed outline definition of 'mature native woodland'?**

Wet woodland matures at a young age and should be treated as a special case. We are concerned that the whole subject of wet woodland – a habitat of

particular importance in the East of England –has been put to one side in the consultation.

### **Question 7**

**Do you agree that local participation in decision making is helpful?  
What is your preferred option for how we apply this element?**

Local participation is important, but will come lower down the consultation process – in other words on a site by site basis. There is a cost in doing this which needs to be recognised, although the FC Environment Impact Assessment and Design Plan consultations work well. There is a big difference between engage and consult. Consultation comes at a much later date. Interest groups should be engaged at the earliest stage possible. Consultation comes later.

### **Question 8**

**Do you agree that prioritisation at a regional level is appropriate for this policy?**

Yes, we are surprised that there is no specific mention of the RACs who should have a key role at the regional level. The Regional Spatial Strategy for the East of England has a presumption against the removal of trees, so regional prioritising will be important, and this is best done through the RACs.

### **Question 9**

**Do you agree with the framework for evaluation? What is your preferred option for how we should apply this element?**

It is crucial that we measure any impact of the actions. In other words there is a need for research and rigorous monitoring. The process as set out is very linear, with no built in feedback. There is also no method for looking at opportunities that have been lost by undertaking certain management. We do not agree with this framework for evaluation which appears short sighted and target driven.

### **Question 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?**

There must be proper monitoring or you lose any potential benefit of the work. But good monitoring costs money. The research and methodology exists to track changes in biodiversity – it needs to be properly replicated and systematic. Do we know what success looks like? The assessment of condition is measured against current perceptions – these could change in the future. The landscape is constantly changing and targets should not be set that have been based on some arbitrary date in the past such as the First Edition Ordnance Survey. There are many external factors that affect policy and hence how you evaluate them. For example, fashion, climate change and disease.

### **Question 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 we do not agree with the principle of a Threshold. Firstly, we believe that any target should be about woodland expansion not loss, and secondly we do not agree with the principle of a threshold which implies that removing a certain level of woodland will not have a detrimental effect on objectives such as saw log production, recreation in woodland and woodland biodiversity. A key question for the committee was at what scale any threshold should be applied. We believe that it would be unacceptable to stakeholders to experience net deforestation at the County level for example. Indeed, Norfolk is already in current net deforestation. We believe that setting a threshold at the England level is too crude and that thresholds – and we would advocate woodland expansion levels – should be agreed at the Regional level and applied on the “Upper tier” authority level.

### **Question 12**

**Do you agree that the proposed threshold is about right, too high or high low?**

Any threshold should be about woodland expansion, with safeguards in place to ensure that there is the correct amount and type of open habitat across all land uses at the Upper Tier authority level.

### **Question 13**

**Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration on expansion of open habitats?**

Yes. Existing research needs to be adequately collated, and a proper mechanism for research and monitoring put in place.

### **Question 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 online practices presented? How could we best ensure that such practices are adopted?**

As soon as you remove trees for open habitat there is a net reduction in carbon storage and sequestration. Practices, such as leaving stumps are to be applauded.

### **Question 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 in the calculations on carbon balance?**

We are a little puzzled by the figures used here. Wood burned with coal is only 30% efficient whereas wood burned alone is up to 90% efficient. The former figure seems to be being used. Would this then increase the forecast carbon savings by a factor of three?

**Question 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 question presupposes that converting woodland to open habitat is a biodiversity gain. We do not believe that this is proven, and it is certainly a complex issue in a dynamic ecosystem. A need to plant new woodlands as compensation when creating open habitat would help to mitigate the need to make such a judgement.

**Question 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 SSSI's?**

SSSIs in particular are currently assessed using static criteria. A basis template is needed for those who are uninitiated in assessment of management of woodland. A more dynamic attitude to all land management is needed.

**Question 18**

**If so, how might such an approach be developed. Is there scope for modifying the conservation objectives on some SSSI's to incorporate a similar approach? If not, do you consider that the end point for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?**

A policy of flexibility to be delivered regionally is essential. Global targets are met by the management of local sites. The end goal is improved biodiversity which must be sustainable. Conservation objectives should be dynamic to cope with wider environmental change. Management objectives can be adopted over time.

**Question 19**

**Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?**

The demand for timber is increasing. Local sawmills have invested heavily and reduced supply of sawlogs could be serious. Of equal note is the signal any loss of woodland would send to the timber industry. Investment in modern technology – with the attendant jobs this brings – is expensive and confidence in supply is critical. The uptake of woodfuel is also increasing in the region and demand is predicted to double the total timber production in the region.

### **Question 20**

**Which of three approaches by which we make decision 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?**

Any policy must be sustainable. The cost of managing open habitats is given as Net Present Value, but the cost needs to be discounted in order to give a true reflection of the costs over time. The need is to ensure an appropriate scale and pace of change at a regional level, but as already stated, the concept of thresholds for forest reduction is not accepted.

### **Question 21**

**What is the appropriate note of compensatory planting in this policy?**

Compensatory planting is crucial and should be linked to targets for woodland expansion, for example around growth points. There is a supposition that there should be like for like planting – but this should be looked at on a site by site basis. The current Regional Spatial Strategy policy on woodland includes a presumption against woodland removal, but – if appropriate – seeks compensation planting of a least equal area and composition, ideally in the same landscape unit; certainly within the region.

### **Question 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?**

As already stated, we do not accept the premise of the policy that some loss of forestry for open habitat is acceptable. We should like to see questions asked:

- What increase in woodland cover should be aimed for (England is currently 8.4%).
- What opportunity costs are there in removing woodland i.e. what management objectives might be compromised?
- Is there a scientific basis for suggesting that removing woodland for open habitat increases biodiversity?
- Should a policy about open habitats look at all land use – not just forestry?

- Is the need to ensure the supply for timber and wood to already expanding markets of prime importance?
- Do you think that increasing the amount of heathland – which will be subject to open access under the CROW Act – will cause potential conflict with the need to increase grazing and therefore deliver desired habitat structures?

### **Question 23**

**Have we missed any major implications for delivery mechanisms?  
Would any be particularly welcome or unwelcome by you?**

The potential loss of woodland could have serious implications for a wide range of other – accepted – government priorities. These include carbon policies timber supply woodland biodiversity woodland expansion, access to the countryside and health and well being. All of this would be unwelcome. It seems perverse that this is a consultation on how to restore and expand open habitats at the expense of woodland.