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:	Hilary R Chittenden
Your organisation (if any):	Environment Theme Action Group, East Dorset Community Partnership
Date:	4th June 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?

1.1 We recognise that for the purposes of overall costing of the Open Habitats proposals it is convenient for the FC to amalgamate all its freehold plantations. However, doing so masks the complexity of the ecological priorities for habitat restoration and variations in potential timber yield at regional and sub-regional level.

1.2 The long standing UK commitment to Biodiversity Action Plan targets predates recent (knee-jerk) commitment on general tree cover of the whole of the UK and must take precedence. The absolute minimum level of removal of trees to restore open habitats must be that which is required to meet BAP targets. It is essential to recognise and comply with this: if not, how can the government possibly make any progress in reaching its target of halting the decline in biodiversity (theoretically by 2010)?

1.3 We strongly recommend that a view is taken on the relative importance and urgency of habitat restoration across the country coupled with ensuring that we maximise the yield of our timber crop, growing appropriate trees where they do best in the UK (not just England). This approach should be supported by using sound ecological principles creating large blocks of restored habitat and reducing the perimeter to area ratio so that islands of natural and semi-natural habitat are better able to withstand pressures through reduced edge effect. Though attractive to walkers and horse riders, widening of forest rides to create ecological corridors is limited in its effectiveness and expensive to manage effectively:

- as the trees grow so they shade out the understorey vegetation that may have started off well;
- the lower growing vegetation is susceptible to trampling by people and horses.

1.4 It is essential that we take this opportunity NOW to maximise the chances of creating not just ecological links and stepping stones between our existing natural habitats but

No	Question.

also the restoration of larger areas adjacent to SSSIs and sites of local nature conservation importance (in Dorset these are "SNCIs") that are threatened through isolation and their large perimeter:area ratio. Making them more resilient to threats such as climate change is critical.

1.5 Taking our local area of East Dorset as an example, it is now more than 10 years since the "On-the-spot appraisal of the Dorset Heathland" was carried out and led to the adoption of the Bern Convention Recommendation no 67 on the conservation of Heathlands in Dorset. This includes in its first clause a requirement to create new heathland from woodlands or agricultural land. The potential for reclaiming agricultural land is very limited: we are dependent on restoration from FC coniferous plantations. Little has been achieved in East Dorset in these 10 years and our heathlands are under even greater pressure with the impending construction of thousands more homes following the publication of the SW Regional Spatial Strategy.

1.6 We strongly recommend that, within East Dorset in particular, areas adjacent to SSSIs and SNCIs are given high priority in the conifer felling programme. There are many SNCIs in private ownership that are not shown on the FC Forest Design maps: details are available from the Dorset Environmental Records Centre. In Dorset many of the SNCIs are equivalent in ecological importance to the SSSIs elsewhere in the UK and land use planning must take full account of their significance. Where it is necessary for heathland habitat protection and rapid restoration to SSSI recovered status, felling should be given higher priority than the economics of the timber crop. Certainly, in Dorset, the higher level of OH restoration is necessary and we would urge for even greater intervention because of the international importance of our heathland. This should include removal of some or all recent restocking where it is adjacent to relatively isolated SSSIs.

1.7 The revised (2007) UKBAP targets for lowland heathland (summarised) are:

T1 Maintain the current extent of all existing lowland heath (no net loss of habitat).Baseline fig. for England 58,000ha

T2 Maintain the area of lowland heathland currently in favourable condition. Baseline fig. for England is 13,049ha.

T3 Improve the condition of lowland heathland on sites currently in unfavourable condition. Figures available may require updating following the recent spate of fires in SE Dorset.

T4 Increase the extent of lowland heathland by 7,600 ha by 2015. Baseline fig. 2000 ha in 2005: targets 3050ha in 2010 and 6100 by 2015.

T5 Increase the number of heathland patches over 30ha from 10% of the total resource to 50% by 2030. Baseline 288 in 2005: targets 342 by 2010 and 395 by 2015.

East Dorset has seen very little heathland restoration and there is clearly an urgent need and a legislative framework for this to be achieved.

Desired outcomes

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

2.1 ECOLOGICAL COMMUNITIES ABLE TO COPE WITH THREATS
2.1.1 We welcome the FC's commitment to this being the key driver of the Open Habitats restoration proposals but would urge that greater importance is attached to the overarching target of HALTING THE LOSS OF BIODIVERSITY BY 2010 (p9). It is critical that we take this opportunity to identify those habitats that are threatened most. We

No	Question.

should not only expand and create many more links to existing habitat but also restore larger areas adjacent to SSSIs and SNCIs that are threatened through isolation and their large perimeter:area ratio. Making them more resilient to threats such as climate change is essential.

2.2 FINANCIAL VIABILITY
2.2.1 The larger the blocks of restored habitat the lower is the cost of fencing per unit area for grazing purposes. Again this supports a sound ecological approach - larger islands are less susceptible to pressures than smaller ones. We note that locally in East Dorset, the thinning and clear felling plans (based on age structure of the Forests) are relatively small blocks, probably reflecting the labour intensive planting and felling of previous decades. Across the country, where restocking is planned, greater efficiency of land use to offset some habitat restoration costs might be considered.

2.2.2 East Dorset shares a responsibility for the protection and enhancement of Dorset's internationally important heathland habitats and species. Restoration would cost far less than for other habitat types across England [Lowland Heath £300-650 pa, Upland £1600-5000, Lowland £1000-£750, Wetland £1000-1500].

2.3 KEEPING TO THE GOVERNMENT'S COMMITMENTS ON WOODLAND COVER
2.3.1 We welcome the commitment to maintaining woodland cover across the UK as a whole. However, responsibility for our woods and forests is currently divided between England, Scotland, Wales and Northern Ireland. We question the validity of continuing this approach. To support sustainable construction, Europe (including the UK) needs to re-establish its timber industry (sawn timber and wood based panel products) and select those tree species that will give the greatest yield and timber quality, planting them where they grow best. We support the plans to ensure no overall net deforestation (including native woodland) and a commitment to no reduction in carbon sequestration. However, on technical grounds the boundaries between Scotland, Wales, England and Northern Ireland in this context are entirely artificial and meaningless and because of climate change we may need to widen our horizons and think in terms of European timber production. Policy should be driven by sound science.

2.3.2 The FC's Yield Class data show very clearly that East Dorset heathlands fall far short of other areas in England in their ability to produce good quality timber: and walks around the forests underline the variability of growth even after thinning and the risk of wind blown trees where the relatively shallow root system cannot hold fast in thin soil in high winds. The yield of Corsican Pine is likely to fall dramatically due to Red Band Needle Blight (RBNB) and it is recognised that even without the now confirmed impact of RBNB on Scots Pine, this species grows significantly better in cooler regions (further north) than East Dorset. Longer term impacts of climate change should also be taken into consideration in planning our forest reserves.

2.3.3 The Policy does not appear to have considered the possible use of "improved" land for the establishment of new forests where natural biodiversity or food security would not be compromised. Such land would include lower grade (4-5) agricultural land but might usefully enhance otherwise degraded Green Belt.

2.3.4 As a nation we have an inherent love of our native broadleaved woodlands and a commitment to their retention is very welcome. Again we underline the need for any new planting to be carefully selected: the right trees must be grown in the most suitable locations - the contribution they make to local biodiversity, watershed protection, landscape and amenity are essential criteria. We recommend that greater consideration is given to the value of and need for amenity planting of native trees within new housing and industrial developments and as part of the wider proposals for more extensive Green

No	Question.

Infrastructure that will reduce the pressure on our more vulnerable habitats.

2.3.5 We would not endorse proposals to grow broadleaved species on former heathland soils. The consequent enrichment of the soil would preclude subsequent reversion to heathland. Our land use planning requires a longer term view and recognition of the custodial nature of our use of our soil – land is the ultimate non-renewable resource.

2.3.6 The document confusingly refers to woodland when discussing both native broadleaved woodland and coniferous plantation. The two are distinct habitats in the minds of members of the general public and we recommend that future documents show this distinction to avoid the very obvious confusion that has arisen locally in East Dorset.

2.4 POSITIVE ENGAGEMENT BY LOCAL AND OTHER USERS
2.4.1 We welcome the way in which our Local FC Team has engaged with so many individuals and organisations in the consultation on the East Dorset Forest Design Plans that will contribute to the final Nationwide Policy. In recent years, within the Christchurch and East Dorset areas, a vocal minority has voiced strong opposition to some tree felling when there were suspicions of ulterior motives. Claims that it would be ecologically beneficial have had little credibility when timber and lop and top are left lying on the forest floor (generally, this has not been on FC holdings). However, it is seen as a waste of resources and reduces landscape value at a local level and fuels the claim that tree felling is bad.

2.4.2 A recent report by Footprint Ecology has highighted the importance of the Dorset heathlands for informal recreation. It is the larger areas of heath that attract people. Smaller local Greenspaces are useful but do not satisfy their wish for semi-natural wide open spaces with low numbers of other visitors – the craving so many of us have to “get away from it all”. The pressures caused by dog walkers and others on our heaths would be greatly diluted by extending the heaths and, where it is possible to extend them in less urban locations (eg Cranborne Common), they are potentially far less open to pressures of invasive non-heathland species and bored kids.

2.4.3 Within the retained areas of plantation forest, the proposals present an opportunity to create more attractive and interesting routes for local users. More gently winding rides could break what for some users are monotonous uniform blocks and create landmarks and focal points. The value of cool areas under trees for exercise (due to high evapo-transpiration rates) will be increasingly important with higher temperatures. Similarly their role as windbreaks must be taken into consideration as part of overall sustainability planning, particularly when siting new developments.

2.4.4 We were sorry to learn that the local FC team’s research showed that people use the forests for walks “because they are there” and convenient rather than because of any special enjoyment derived from them. This may indicate a role for greater local involvement and education. Suggestions have been made in East Dorset for a scaled down version of Moors Valley Country Park in the Cannon Hill/Uddens area. We strongly recommend that the feasibility of this is considered and more details supporting it have been included in our response to the local consultation. Similar schemes across the country might be worth considering and, given the proven success of Moors Valley, could well support FC income.

2.4.5 Dorset is renowned for its wide open vistas, many of which have been obscured by 60-70 foot high coniferous plantations. This is likely to apply to other now forested areas across the country. Even where it is not economically viable to fell large numbers of trees, so much more could be made of the potential for restoring our views and creating information points. Winding tracks to a summit viewpoint could provide recreational

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targets and be graded to accommodate the needs of those who are not as fit as we once were or for parents with small children in buggies.

2.4.6 Converting dense conifer plantations to open habitat is likely to improve landscape quality. If they are well designed, restored habitats will also provide more attractive settings and thus enhance quality of life.

2.4.7 We are concerned that the consultation document (p16) is somewhat dismissive of the historic landscape: It is hardly likely to engage members of the public asking them to read about once important features but telling them "hard luck", they can no longer see it because of the trees. Panoramas matter: we climb to the top of tall buildings to put them into their historic context and see what lies below and in the far distance. East Dorset forests include numerous round barrows which, like the heathlands, originate from the Bronze Age. The history of our coniferous plantations is somewhat less exciting.

2.4.8 There is a question below (Q6) about the definition of native woodlands and a time scale of not less than 80 years is suggested. Given that heathlands date from about 2300- 700BC, we suggest that a clear policy framework protecting heathland should be equally valid.

2.5 CARBON BALANCE
2.5.1 The sequestration of carbon is somewhat more complex than outlined in the FC reports and carbon held in soil, including the stumps and root systems, is lost to the atmosphere in the deep cultivation that is required for replanting of trees. The documents acknowledge that this has not been taken into account in the calculations but we request that the total carbon balance is determined where this is to be a deciding factor in land use.

2.5.2 We are concerned that the impact analysis of carbon balance does not appear to have taken into account any positive impact for restoring peat-forming ecosystems and other habitats.

2.6 TIMBER SECTOR ACTIVITY
2.6.1 Please see our comments under "financial viability" and "woodland cover" above.

2.7 WOODLAND BIODIVERSITY
2.7.1 We support the intention of not compromising improvements in trends in key species of native woodlands and plantations.

2.8 The desired outcomes should also include meeting UK BAP targets. This is fundamental to the whole Open Habitats programme.

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?

3.1. ECOLOGICAL COMMUNITIES ABLE TO COPE WITH THREATS. Given the international importance of Dorset's Lowland Heaths we would wish to see them identified as a separate habitat under this heading.

3.2 FINANCIAL VIABILITY could usefully include any additional income generated as a result of new visitor attractions.

No	Question.

3.3 WOODLAND COVER should be subdivided to take account of native broadleaved woodland, new Community Forests (likely to be low density but large areas) and coniferous plantation.

3.4 POSITIVE ENGAGEMENT BY LOCAL AND OTHER USERS. It is unclear what would be considered a good outcome. Would it be good if lots of people raise concerns (and are thus engaged): alternatively would it be good if this were minimised due to increased awareness? A better measure is needed here

3.5 CARBON BALANCE

3.5.1 Calculations should include losses of soil carbon particularly where soil is physically disturbed, long term sequestration by heathland (including the current research on how microbes in dry heath could be significant absorbers of methane) and the formation of peaty soils particularly in valley mires or other habitats including build up of leaf litter. Allied to this is the carbon balance of the timber industry: what is the carbon consumption of planting, harvesting, transport, conversion to end product (eg use of timber for permanent structural components such as sawn lumber or wood based panel products rather than fence posts with limited life) and marketing? What offsetting could be achieved through better growing conditions and choice of species? It is widely accepted that with climate change increased photosynthesis is leading to greater yields, particularly in broadleaved species across Europe: thus there is significant increase in carbon sequestration.

3.5.2 The Hardy's Egdon Heath project estimated that 1152 ha of tree clearance would result in 123,000 tonnes of carbon over 20 years – equivalent to one 747 flying across the Atlantic 100 times. This is the carbon that would have been fixed by the trees had they been allowed to remain so the carbon deficit of the plantation clearance is due only to the prevention of tree growth not from release of carbon through burning or decay.

3.5.3 There is no evidence that the restoration of heathland necessarily results in a negative carbon balance. Even if it does it must be put into context as indicated in the previous paragraph.

3.6 WOODLAND BIODIVERSITY. The outcome listed in section 5.1 relates to trends in key species (NERC s41 species). However, the measure identified in Table 5 relates to loss of established native woodland per se and so would register as negative even if, for example, nightjar populations increased after the removal.

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?

4.1 Priorities for woodland removal should be determined on ecological grounds: BAP targets will not necessarily fall conveniently into FC regions and permit an even distribution of open habitat gains across England. The urgency of achieving BAP targets has been neglected in the consultation document.

4.2 We disagree with point 6 (section 6.1). The aim should be to meet BAP targets, and to encourage and increase new native planting in appropriate places such that long term targets for expansion of native woodland are met.

4.3 We are concerned that a commitment to retaining tree cover across the UK as a

No	Question.

whole risks being translated into retaining all of England's plantations and that biodiversity targets will be largely ignored. To ensure this does not happen, we should grasp this opportunity to rethink our landscapes and develop them for the 21st and 22nd centuries. Creating broadleaved woodland on non-HAP land (lower grade though improved agricultural land) should be given serious consideration. It could contribute to biodiversity objectives for eg all native woodland species, coppice and orchards, create additional employment and provide essential areas of Green Infrastructure.

4.4 Again the use of the term "woodland" when referring to coniferous plantation is misleading. In discussing this suggestion we refer again to the overarching target of halting the loss of biodiversity by 2010 and our international commitment to heathland re-creation.

4.5 We agree that inappropriate management must not form part of the policy and that in some cases abrupt transitions can mar the landscape. The width of the rides and frequency of cutting or other management to maintain a varied understorey are critical and will govern the biodiversity of these corridors. This has to be balanced against the potential for long straight wide rides to act as wind tunnels. Costs of such management need to be included and offset against the introduction of grazing.

4.6 Although the third bullet point of section 6.1.1 is not incorrect it is misleading. Open habitats provided by forest rides are only a substitute allowing some species to cling on, and provide a tantalising view of what else can be achieved if and when greater areas of open habitat are restored.

4.7 The fourth bullet point also depends on on which type of woodland is created: if it is diverse blocks of native woodland then maybe the ecological communities will be better able to cope with the pressures of climate change; dense monocultures of non-native species will be less helpful.

4.8 The direct answer to question 4 is NO, we do not agree. The question appears to be leading consultees towards accepting patches of open habitat within monoculture dense conifer plantations. Yes, a vision of open habitats that are not totally treeless would provide a picture which is more realistic of landscape scale conservation aspirations. However, 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.

4.9 We are concerned that the claimed potential mutual benefit relies far too heavily on heath/forest rotation. a form of management that is unproven, rather than recreating permanent heathland.

4.10 As yet we have no direct proof that heathland will continue to return successfully after more than one forest crop has been removed. While there are certainly some species that are mobile enough to move around with heath/forest rotation, there are others that are much more sedentary, some highly so. Byfield (2009) states "This (clear fell rotation) completely fails to provide suitable habitat for most UK BAP heathland plant species. Just 5 of the 32 plant Priority Species are capable of surviving well under a rotational, forestry regime…but the remaining 27 are resolutely confined to permanent heathland." Many heathland animals are very sedentary and will not easily return to rotated heath, if at all.

4.11 The best option for heathland plants is reversion of conifer plantations. If rare heathland plants are to recolonise we need to plan permanent heathland links not just wooded heath. Some plants will come from the seedbank but not all. Heathland in its

No	Question.

broadest sense supports nearly 100 rare or threatened vascular plants. Some invertebrates may also need continuous more open habitat. Wooded heath has proved to be good for some larger heathland animals and more wooded heath buffer zones between open heath and plantation would help slow invasion by trees and make a less abrupt transition visually.

4.12 Any mosaics of plantation forest and open habitats should ensure that the open habitats are large enough to be ecologically robust and that edge effect is reduced to a minimum to reduce the potential for invasion of unwanted species (from neighbouring agricultural land or forest).

(Byfield, A (2009) "Heathland, plantation and the Forestry Commission: a botanical perspective" British Wildlife 2, no 4, p267-272)

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'?

5.1 Para 6.1.2 mentions "relatively biodiverse native woodland" and we assume that this is relative to dense coniferous plantations (see response to Q4 above). However such recent woodland may well not be biodiverse compared with the open habitats that could be restored. We support the principle that there should be a presumption (and stronger) against removal of ancient woodland. However any policy on secondary woodland should be more flexible to allow for differing circumstances.

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

6.1 While it is understandable that foresters' first love is their trees, we must put wooded habitats into their ecological and historical context. Our heathlands date from about 2300- 700BC and are thus as worthy of protection as ancient woodlands. The 80 year "rule" for other woodlands pales into insignificance by comparison. Such recent woodland may well not be biodiverse compared with the open habitats that could be restored. As we have commented above (5.1), we support the principle that there should be a presumption (and stronger) against removal of ancient woodland. We strongly recommend that the 2nd and 3rd bullet points in the draft definition of "mature native woodland" are amended to allow much more flexibility for local circumstances and priorities.

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?

7.1 We have been impressed with the way in which our local FC team has engaged key stakeholders in the early stages of the OH proposals. Please refer to our comments under Q2, "Positive engagement by local and other users".

No	Question.
7.2 A rigid prescription for consultation will not be helpful: the appropriate methods depend on local circumstances. Guidance (option 4) would be helpful. It is important to establish how to resolve any conflict that might arise between local aspirations and BAP (or even Habitat Regulations). In some cases opposition to tree removal has resulted from • misinformation eg 'tree removal will increase flooding' or ' keeping the trees will stop mineral extraction'; • conspiracy theory eg 'FC want to remove those trees so they can sell the land for houses'; or • simply not being told about it before the work starts. All these require local sensitivity and the right information being prepared and circulated at the right time.	
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?
8.1 No. The regional approach is too artificial to be meaningful. We need to establish what is critical at National level. Please see our comments (2.3.1 above) on the need for a UK wide approach to timber production Para 6.1.4 refers to loss of woodland but does not make clear if this is native woodland or yet again misleadingly referring to coniferous plantations. The SW region is diverse with many variations in BAP priorities and existing habitat extent. Therefore, we would recommend that, once it has been recognised at National level that eg the Dorset Heaths are a special case, more local sub-regional priorities such as South East Dorset should be considered.	
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?
9.1 Our target of reducing the decline in biodiversity by 2010 must remain at the forefront of everyone's mind in the implementation of the OH policy. Consequently we should select the evaluation framework that encourages practitioners most and does not overwhelm them with unnecessary bureaucracy. Land owners have had enough of that in recent years. While it may be understood by and acceptable to the FC managers, the framework proposed does not appear to be one which would encourage private landowners to restore open habitats. Greater consideration should be given to how the FC can provide practical help for monitoring and evaluation to inform the future development of the policy.	
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?
10.1 As discussed above, private landowners in particular should be given practical help and support and possibly some funding to operate their voluntary contribution to the OH programme.	

No	Question.
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?

11.1 No, we do not agree with the proposal for a threshold rate of "woodland" removal. Instead, positive targets should be set.

- Again the term "woodland" is used though the policy should be focussing on its objective of enhancing biodiversity and restoring open habitats primarily through enhanced rate of removal of conifer plantations.
- It must be made totally clear that the FC does not intend to treat removal of non-native monocultures with little biodiversity value as equal to removal of fully functioning biodiverse ecosystems.
- Tree cover across the UK should be just that and not based on historic administrative divisions between its constituent countries. The "right tree in the right place" must include growing trees where the yield class is optimal for those that will be harvested. Similarly, good growth rate and form are important for amenity woodland or where one is looking to create the veteran trees of future generations and ensure the retention of a good genetic resource.
- Unless this approach is adopted, the OH aim of enhancing biodiversity will always be in direct conflict with tree cover.
- We must ensure that we try to meet both biodiversity targets and woodland cover target with the expansion of planting of native woodlands in appropriate places.

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

N/A. See comments under Q 11.

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?

13.1 We are concerned that the FC documents have only discussed carbon sequestration superficially and have totally ignored carbon held as below ground biomass in all scenarios

- in growing conifer plantations, felled trees, deep cultivation for replanting, and losses in end use and transportation;
- that held in native broadleaved woodlands in the trees shrub and ground flora layers and in the leaf litter and organic matter in the soil; and
- the complex of open habitats particularly where there are peaty substrates.

13.2 The target for biodiversity objectives for Dorset heathlands must be enhancement of heathland flora and fauna in each of the heathland plant communities. This can best be achieved through expanding existing areas to reduce pressures due to

No	Question.
edge effect. Permanent habitat restoration is the only way in which we stand any chance of success in restoring plants other than annuals and it is known that many species of heathland fauna are sedentary. The shifting mosaic approach introduces yet another variable in the system. Our heaths are already under too much pressure to risk such poor experimental design.	
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?
14.1 Soil disturbance should be minimised and roots and stumps allowed to remain in the soil. They will in time support bryophytes, fungal growth and invertebrates which in turn will provide a food source for vertebrates. Such restrained management would support restoration to acid grassland and heathland and reduce natural regeneration of pines. Carbon would not be wastefully expended on mechanical operations and soil carbon would not be lost to the atmosphere. 14.2 Lop and top (brashings) give rise to public concern. If left in situ they can be unsightly, reduce accessibility to the forest and are seen as wasteful. Perhaps greater consideration could be given to local fuel collection schemes to help win over communities. Brashings left where they fall increase soil fertility in time but slow the release of carbon. We recommend their removal where land is to be restored to heathland.	
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?
15.1 No, we do not agree. Please see comments under 3.5 above. There is clearly a need for the FC to do all its sums on total carbon sequestration and also to put the impact of the proposals into a global context including the role of algae and valley mires. Far more carbon management (with increased sequestration) can be achieved through changes in practice. Then, good public communication is essential: basic undergraduate ecology teaches how carbon in tropical forest ecosystems is almost entirely above ground while temperate forests store much of their carbon as leaf litter and organic matter in the soil. This message needs to reach our politicians as well as the general public – it's too easy to follow old incorrect/incomplete mantra. It is of concern that the findings of more recent FC research and publications do not appear to have been included in these policy proposals.	
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?
16.1 The RSPB and Footprint Ecology (Alsbury et al, 2008) have confirmed that overall, any negative impacts of heathland restoration would not outweigh the benefits. The work will ensure the survival of some of Europe's rarest habitats and species. This ecological richness has developed over millennia on ancient landscapes: they too would benefit from	

No	Question.

restoration.

16.2 Processes that would contribute to carbon "saving" include:

- increase in valley mires to renew peat accumulation;
- manage heathland to ensure maximum biomass accumulation;
- local use of brashings/arisings – free fuel for rural communities;
- reduce soil disturbance in forestry operations;
- improve management of native woodlands to allow them to function efficiently as carbon sinks;
- reduce fuel consumption in forestry operations and transport of timber to sawmills;
- ensure the end product has a long life eg sawn lumber, particle board, wood wool cement slabs rather than fence posts/fuel.

(Alsbury, S., Day, J & Liley, D (2008). Updating the EIA for Tree Removal from Heathlands. Unpublished report for Natural England and the Forestry Commission, The RSPB, Sandy, Bedfordshire)

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?

17.1 We are concerned that there appears to be an over-reliance on the dynamic approach which seems to take us little further forward than current practice. Again the document makes the point about some species doing reasonably well on rides. We know from Dorset that many rides can support interesting species and some may even be recognised as SNCIs. However, open heathland of a similar size to a conifer plantation plus rides is almost always of international wildlife importance. There is no comparison.

17.2 The issues raised in para 4 of Section 6.2.2 are important. The economics of managing open habitats clearly show the mutual benefit of extensive grazing schemes which require large areas and their consequent lower fencing costs and lower scrub management costs.

17.3 We consider that the photographs on p33 are particularly unhelpful. We assume that the top left picture is supposed to illustrate "before" in which case it should show a dense plantation (as in the adjacent aerial photo) not an open light vista. The bottom photo illustrates scattered trees – again this does not appear to relate to the aerial photo which shows dense blocks of conifer in an otherwise open landscape.

17.4 There is a valid question about National Vegetation Classification (NVC) based condition assessments and if we should be worried whether an H2 or H3 heathland regenerates. However, a more flexible condition assessment should still be looking for priority habitat to be restored: it should not excuse the retention of species poor conifer blocks.

17.5 The minimum viable areas of habitat must take account of the larger areas required to buffer climate change impacts. In assessing areas required, full allowance must be made for the full range of heathland habitats, including heath/acid grassland mosaics and

No	Question.
mires. Climate change will not affect all species equally and the dynamics of existing communities may change: there must be adequate space within any one site for individual species to move to more appropriate areas for their continued existence.	
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?
Please see comments under 17 above.	
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?
19.1 The comments on supply of woodfuel appear to be presented as an argument for retaining conifer plantations on heathland soils. 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. The final argument about sources close to markets is not significant as it only applies to small geographic areas: elsewhere markets will be enhanced by planting of woodlands better interconnected with communities. 19.2 The timescale over which the assessment is made is unclear as is the destination of the timber produced from the open habitats restoration. With increasing requirements for Green Infrastructure, particularly in urban and urban fringe areas, additional jobs will be created in silviculture and tree surgery and possibly in more extensive recreational areas and activities. Open habitats restoration will require fencing contractors where land is to be grazed. High quality timber for structural building purposes is not produced on the heathlands of Dorset so there will be no impact on that aspect of the timber sector. 19.3 We would welcome further details of the potential impact of timber production changes on economic activity as your analysis and understanding develop. This is an important aspect of the work of the East Dorset Community Partnership in which it is planned to establish a business group to support our role in Spatial Planning.	
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?
20.1 (section 6.3.1)The estimated cost of £24m to meet BAP targets is still a small proportion of the £200m/year HLS budget. Added to this, could funds be redirected from schemes which are not delivering the environmental benefits expected of them eg by removing some aspects of ELS schemes into cross-compliance requirements? 20.2 We have had great difficulty comparing the three options due to the way in which they have been presented. Yet again it is unclear what is meant by woodland: a clear distinction must be made between native broadleaved woodland and exotic conifer plantations. Failure to do so is misrepresentation. The claim relating to reduced carbon	

No	Question.

emissions is unsubstantiated: please see our earlier comments. In trying to frame a Government policy statement we would prefer the wording to be less emotive. The facts that need to be included are:

- The land was once open habitat and retains significant wildlife potential.
- It was planted with non-native conifer plantations (and some broadleaved plantations) in the 20th century. The coniferous forests in England support little biodiversity and are under threat of disease. It is now proposed to remove some parts of these plantations.
- This will enable us to restore some of these (priority) open habitats and so maintain and enhance wildlife, conserve historic landscapes and features and release views.
- The restored habitats will be managed sustainably, in some cases through setting up viable grazing units.
- The rate of tree removal will be closely monitored and other trees planted to offset any adverse impact on total woodland or carbon sequestration.

The role of compensatory planting

21.	What is the appropriate role of compensatory planting in this policy?

21.1 In some areas, Green Infrastructure may well be funded privately eg by developer contributions, so reducing the cost to Government.

21.2 We suggest that funding to support planting conifers should be redirected to planting them where they have a high Yield Class.

21.3 We suggest that the two issues are 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

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?

22.1 Although the outcomes are linked to those in Table 5, the suggested questions do not relate adequately to the indicators. Rather than trying to rephrase (and in most cases diluting the quantifiable indicators) the policies should be assessed against the indicators and judgements made on their relative strengths. In addition to comments below, please refer to our response to Question 3.

22.2 ECOLOGICAL COMMUNITIES ABLE TO COPE WITH THREATS
We need to identify how much open habitat will be restored and if the option chosen provides greatest benefit in terms of area and impact on HAP targets. Patch size, connectivity, diversity and management to benefit named key species are additional criteria that will inform the assessment of the contribution to HAP targets.

22.3 LONG TERM VIABILITY
You may wish to include identification of other possible funding schemes and the possibility of new income generated from visitor attractions.
Cost effective land management options must focus on HAP targets.

No	Question.

22.4 BURDEN
This should reflect cost/benefit rather than simply cost. Increase of accessible open space, attractive landscape and ecosystems encourage people to get out and enjoy their countryside. The health benefits may be difficult to quantify but are very important and might be a means of securing additional funding.

22.5 WOODLAND COVER
HAP targets and the urgent need to meet our commitments to biodiversity objectives must influence the rate of removal of plantation forests. Government is committed to avoid net deforestation in the UK as a whole and not England. Conifer plantations, ancient woodland and recent planting of native broadleaved woodland must be identified separately.

22.6 LOCAL ENGAGEMENT
Clear definitions of what is wanted are essential. How is high quality local participation to be quantified?

22.7 CARBON BALANCE
The first suggested question must be deleted: its presupposition is incorrect. Please see our many comments to earlier questions on this. It should be replaced with an objective question seeking a quantifiable answer on the overall carbon balance.
Similarly the second question has not taken into account other forest operation and end product measures that the FC can put in place to reduce carbon emissions.

22.8 TIMBER SECTOR ACTIVITY
The questions do not take into account other factors which affect yield class such as disease and climate change. They are closed questions and do not seek quantifiable answers. There is no indication how these questions will help evaluate choice of policy.

22.9 WOODLAND BIODIVERSITY
It is important that provision is made for local circumstances and priorities that affect "mature native woodlands". As we have stated in response to earlier questions, recent woodland may well not be biodiverse compared with the open habitats that could be restored. It is not only the woodland biodiversity that should be considered but the priority HAP targets. The first question should be amended accordingly.
The second question should identify not only if mature native woodland will be lost but how much, and what the benefits are to the OH Policy.

Implications for delivery mechanisms

23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?

23.1 A grant mechanism is needed to allow removal of trees that were planted on priority habitats with public money. There are a number of plantations that serve no biodiversity or landscape value, being dense conifer, planted on chalk grassland Sites of Nature Conservation Interest or other habitats 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 use HLS or other grants to remove them before they get to maturity.

Other comments

No	Question.
We welcome your input on any other aspect of this consultation.	

24.1 The proposals for the Restoration of Open Habitats offer a unique opportunity for

- **enhancing biodiversity and increasing the resilience of vulnerable habitats and species;**
- **restoring ancient landscapes;**
- **creating new landscapes through appropriate planting of native species ("the right trees in the right place") as part of essential Green Infrastructure;**
- **significant potential health benefits through increased public use of more attractive open space;**
- **employment opportunities.**

24.2 There is a very strong case for significantly increased funding for the FC to implement OH policy coupled with our recommendations for increased planting of native species. Work on this scale would be of such public benefit that it should be supported by far more than normal FC operational funds. Because of the international importance of the Dorset heaths, EU funding should be sought to support their protection. We would be happy to help the FC lobby for this.

24.3 There is evidence that invading generalist non-heathland species will occupy ecological niches at the expense of specialist heathland species (Webb & Hopkins, 1984). Throughout our response we have emphasised the need to reduce the edge effect in the management and restoration of open habitats. This has always been an important ecological principle but requires special attention with the threats imposed by climate change.

[Webb & Hopkins (1984), Invertebrate diversity on fragmented Calluna heath. J App. Ecol. 21]

24.4 The urgency for restoration of heathland habitat in East Dorset is such that we recommend serious consideration should be given to removal of some or all of very recently restocked areas particularly where they are adjacent to relatively isolated SSSIs. If done now this could be achieved at relatively low cost. Waiting for the crop to reach maturity in 50-60 years time should not be considered an option.

Please include the "information about you" form with your response.[1]

Please send your completed forms to:

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By 17.00hrs, Friday 5 June 2009.

[1] See www.forestry.gov.uk/england-openhabitats-consultation for a copy.