

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:	Graeme McVittie (Woodland Officer)
Your organisation (if any):	Exmoor National Park Authority
Date:	04 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?
We have policies and aspirations for the expansion of open habitat from woodland and forest but no specific targets. We would prefer not to see targets but to take opportunities based on a broad environmental assessment in each case which may in some cases show the status quo .	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
There is insufficient emphasis placed on the landscape character and quality outcomes, the maintenance and enhancement of access opportunities and the conservation and enhancement of archaeological features and historic landscapes. We would like to ensure that the application of this policy does not have the potential to adversely affect the special qualities of protected landscapes.	
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?
There should be more account taken of local indicators	
Policy proposals	

No	Question.
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?
We agree that transitional habitats and fluid mosaics of mixed habitats are mutually beneficial however this may require additional resources. "Traditional" commercial woodland management, which can underpin conservation management activity, needs to be supported.	
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'?
We wholeheartedly agree with this principle. We would extend the principle to include mature non-native woodland (eg 100 yo Scots pine in southern England) or woodland which contains non-native species which has developed landscape, ecological or other environmental value.	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
We feel that 80 years is too high a threshold. In some cases a 40 or 50 year native woodland has "matured" so as to possess significant biodiversity and landscape values.	
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?
We agree that it is helpful. We would prefer a flexible approach based on the site and local conditions.	
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?
Yes.	
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 framework is a sensible proposal but would not consider compulsory requirement to be helpful and would prefer option 3 or 4	
10.	How much and what kind of support do you think we should give to practitioners to

No	Question.
	help them evaluate their projects using this framework?
As in option 4 above, guidance and funding according to the circumstances would be helpful. As with the EWGS which offers WPG, WAS and uses a standard plan format a similar approach could be developed for proposals to create open habitats.	
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?
We think that there should be a threshold. Deforestation should be "netted off" against woodland creation at a sub-regional level as appropriate. If woodland isnt being created there should be no deforestation. It is important that the overall objective must be to continue to increase woodland and forest cover.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
Too high given that current incentives for woodland creation are ineffective meaning that "netting off" is unlikely to be achieved.	
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?
No comment	
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?
Yes but some specific caveats may apply on some sites. The grant aiding or regulatory framework should require the techniques be adopted	
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	
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?

No	Question.
	<p>Robust habitat networks (open and woodland) will allow species to migrate and adapt and on balance this may be more important than the contribution these projects make to increased carbon emissions. However we feel that the question of where the balance lies is impossible to answer here. How can society compare the value of 10 more heath fritillary butterflies with a woodland sequestering 500 tons of carbon p.a? We do not feel that robust methodologies are in place to objectively address these issues.</p>
<p>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</p>	
17.	<p>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?</p>
<p>Yes as a general rule, but on a site by site basis. Methodologies for assessing the biological condition of land appear to be further advanced than those for assessing condition in terms of its landscape, cultural heritage, carbon balance, soil condition, productivity, access value and other factors. Under these circumstances it is important to ensure that land management decisions are not made on biodiversity considerations alone.</p>	
18.	<p>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?</p>
<p>As a general rule we would disagree with modifying conservation objectives on SSSI open habitats. However, in some situations and on a case by case basis, it may be appropriate to have modified objectives that allow a more flexible management and allow continuity.</p>	
<p>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</p>	
19.	<p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>
<p>On Exmoor many sites proposed for restoration in the past have met with resistance from the timber industry as many support productive stands of timber with good year round access on free draining soils.</p>	
<p>Different approaches to applying policy</p>	
20.	<p>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>
<p>We would prefer option one taking as wide and long-term view of the prospect for the type of agricultural systems proposed depending on type of open habitat in question. We have also found that the maintenance of open habitats brings undesirable paraphenalia including fencing, shelters, structures etc which may have adverse landscape, cultural heritage and access implications. Elements of 2 or 3 to be considered eg woodland structure and rotation.</p>	

No	Question.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
We would not necessarily wish to see compensatory planting but a net increase of mixed woodland at a sub-regional level over say a 5 year period as part of an ecologically functioning landscape	
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?
Yes, the long-term management should be the key criteria. If it can't be managed in the long-term or if the type of management and infrastructure required is inappropriate then it should not be considered especially in the context of protected landscapes such as Exmoor National Park. Furthermore there should be additional and better questions on landscape, archaeology and access.	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Advice and support from the public sector (for example National Park Authorities) could assist private landowners in developing high quality proposals which will help achieve a reasonable balance of public benefits.	
Other comments	
We welcome your input on any other aspect of this consultation.	

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

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.

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