

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:	Mike and Jemma Box
Your organisation (if any):	Forest and Land Management Ltd
Date:	03-06-09

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?
The current rate of 500ha per annum should be considered as a maximum as any increase in this could create local extinctions of species adapted to the woodland currently present, creating a considerable loss of carbon sequestration, and a potential loss in FTE in the timber industry which in the present climate is unacceptable. This level of woodland loss would allow for the accurate evaluation of the success / failure of the scheme.	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
No, these proposals are bound to have an impact on future investment in the wood processing industry. How do you propose to avoid net deforestation in England under these proposals, what recording facilities will be in place to avoid this? Is the loss of carbon sinks within woodlands justified by the gain in open habitats. This needs to be established before the scheme is launched. On your list of desired outcomes what monitoring and recording proposals have you planned to assess the net loss/gain of species?	
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?
No, we are concerned about the lack of consideration given to the existing woodland identified for clearance as a valuable habitat in itself. What measures are to be put in place to assess the ecological value of each individual woodland identified for the	

No	Question.
	<p>restoration of open habitats. What about European Protected Species that may be inhabiting these woodlands? Will the woodlands be de-selected if these species are found. For example there is evidence of several species of bats and particularly Dormouse found using conifer woodlands.</p> <p>Why only monitor UKBAP species as it is schemes like this that can considerably reduce numbers of species not necessarily on the UKBAP list. Should not all species be monitored and recorded?</p>
<p>Policy proposals</p> <p>Elements present in the policy</p> <p>We will treat woodland and open habitats as potentially mutually beneficial</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>I believe that both habitats are valuable for different reasons and support different populations of species. I don't believe it is helpful to promote this idea as it doesn't underline the potential loss of particular species due to woodland loss.</p>	
<p>A presumption against removal of 'mature native woodland'</p>	
5.	<p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>
<p>Yes definitely.</p>	
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
<p>We believe that PAWS sites should also be excluded from the scheme as through their designation they have already been identified as being previous Ancient Woodland Sites and therefore were not previously open habitat and therefore should not be converted into such. However we believe that it should still be promoted to revert these areas back into ASNW and therefore still supporting the timber industry.</p>	
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
7.	<p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>
<p>Local participation should be sought at the initial stage before any applications are submitted. A scoping meeting will give the opportunity to inform the local people of the proposals and the reasoning behind them prior to the hearing about it from a third party, usually unreliably, and therefore not understanding the picture fully.</p>	
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>

No	Question.
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?
<p>In this framework we believe there should be an element of monitoring and evaluating the ecological value of the current woodland. This should contain a certain degree of species monitoring and an evaluation of how the present species will be impacted upon. Once the framework includes this, then we believe that it should be insisted that the framework is used as a condition of funding.</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?
<p>Most practitioners may not be familiar with this type of evaluation, therefore some guidelines should be published and if indepth monitoring is required then there should be funding available for this as it is an expensive and timely project.</p>	
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?
<p>We do believe a threshold is appropriate however, as stated before we do not believe that initially, until this scheme is proven to work then deforestation should not exceed 500ha per year.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
Too high.	
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?
<p>The publication of the Forestry Commissions findings from the areas they have attempted to restore or expand would be beneficial.</p>	
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?

No	Question.
	We do believe that management practises should be adopted to minimise carbon emissions, as this will also have less impact on the species currently present on site. We agree with the practises presented and these should be a condition for funding.
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?
	Definitely, the impact on the net loss of carbon sequestration from the proposed restoration and expansion of open habitats is one of the most concerning factors in a time when climate change is the biggest threat to all British species.
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?
	We believe that to not cause a negative impact on our climate change targets and therefore the risk to our flora and fauna compensatory planting should definitely be considered to make up for the loss of trees to open habitats. With the figures that have been supplied, the estimated area proposed for clearance to open habitats would result between 62,160 and 504,000 tonnes of carbon storage removed.
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 endpoint for all restoration proposals should be judged against favourable condition for SSSI habitats as if we are going to the trouble of restoring and expanding these habitats it is for the objective of increasing biodiversity and therefore should be judged against this criteria to see if the project was worth it. These findings however should be recorded and published.
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?
	None other than the decrease in timber availability in an already struggling industry, it will make it increasingly more difficult to compete with the scandinavian countries and will also result in a loss of jobs which has already been stated is not acceptable in the current climate.

No	Question.
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?
Ensuring appropriate scale and pace of change at a national level.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
We feel that the role of compensatory planting in this policy is hugely necessary, one to provide habitats for the species adapted to this type of habitat, to result in no net loss of woodland cover in Britain and to result in no net loss, eventually, of carbon sequestration.	
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?
Again we believe there should be a question included in the surveying and recording of species present in the woodland that is proposed to be restored to open habitat and the impacts that the clearance will have on them.	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
If these schemes result in needing EIA's for either the clearance or compensatory planting then funding should be available for this as writing an EIA is an involved and lengthy process sometime needing the expertise of people other than the practitioner.	
Other comments	
We welcome your input on any other aspect of this consultation.	
<p>If the restored or expanded open habitat is then reverted to 'open country' what will the implications for species such as ground nesting birds and the disturbance this will cause to them?</p> <p>Who will fund the subsequent monitoring?</p> <p>Should this scheme be launched until there is hard evidence of the success of projects like this.</p> <p>In your consultation document you state that these proposals could result in a loss of 300-1500 full time equivalent jobs, mostly in the rural areas. It also states that these proposals are going to cost the industry between £3.3 and £18 million pounds. Just when timber is beginning to play a very significant and important role regarding fuel this proposal suggests the removal of up to 150000 ha of timber growing land which just does not make any sense. Also we must remember that timber is still in the top three of our highest import costs. In over 40 years working in forestry and woodland management I have to say</p>	

No	Question.
	that these proposals are the most concerning and disturbing that I have ever heard.

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

Please send your completed forms to:

[Dominic Driver](#)

Senior Projects Officer | Policy and Programme Group | Forestry Commission England

620 Bristol Business Park | Coldharbour Lane | Bristol | BS16 1EJ

0117 906 6003 | 07779 627668 | oh.consultation@forestry.gov.uk

Fax: 0117 931 2859

By 17.00hrs, Friday 5 June 2009.

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