

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:	Simon Harrap
Your organisation (if any):	Trustees of Holt Lowes
Date:	5 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?
I would prefer the upper level of intervention (30,000 ha) due to the very large losses of open habitats, and because there is a 'window of opportunity' in which open habitats can be successfully restored from plantation woodland due to the maintenance of a relict seed-bank in the soil, after which it becomes increasingly difficult to restore the habitats - it becomes a case of habitat creation.	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
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?
Policy proposals	
Elements present in the policy	
We will treat woodland and open habitats as potentially mutually beneficial	

No	Question.
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>Yes, they are mutually beneficial, but where woodland is retained there should be a presumption that the plantations of exotic species should be replaced over time with native tree species. In addition, there should be a presumption against retention of woodland on habitats that were not wooded in recent history (e.g. the 'flow country' of northern Scotland).</p>	
<p>A presumption against removal of 'mature native woodland'</p>	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
<p>Yes, for 'ancient woodland', but see comments on 'mature native woodland'</p>	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
<p>The definition of 'mature native woodland' is not restrictive enough, and would not give enough flexibility on some heathland sites. In particular, a 'closed canopy' in just the last 20 years is far too recent. I would opt for:</p> <p>sites currently composed of native broadleaves that have been wooded for at least 110 years; and</p> <p>sites where the current native broadleaved crop is at least 80 years old (pre-Second World War) and has been closed canopy (>70%) for at least the last 50 years.</p>	
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
<p>Preferred option: a softer approach and encourage high quality engagement to reduce problems later.</p>	
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	

No	Question.
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
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?
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?
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?
No, I do not agree, because it is very unlikely that in the medium term (say 50 years) there will be a net loss, but in the short tem this provides a mechanism to slow and delay projects, even those which are a priority under the overall umbrella of restoring open habitats.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
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?
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 ONLY where this does not conflict with the basic goal of the process. E.g. in both heathland and mire restoration, it is almost essential to remove the tree stumps; on heathland the retention of stumps makes subsequent management with wheeled /	

No	Question.
	<p>tracked machinery almost impossible, while in more the holes left by winching out stumps (where this is practicle) greatly enhance the biodiversity of the resultant mire.</p> <p>Similarly, ONLY where this is not an excuse to delay projects (e.g. waiting until trees are economically mature could delay restoration on sites that were very important for decades).</p>
15.	<p>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?</p>
No.	
16.	<p>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?</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>Sites must be actively managed. A more 'dynamic' approach will, in my experience, inevitably lead to the rapid return of trees to a site. This 'Would a more flexible and dynamic approach make it easier to deliver desired outcomes?' - yes because the desired outcome would de facto be the return of woodland! To be effective in terms of biodiversity and the retention of/ increase in species of open habitats, the desired outcome must therefore include a specified target for the total area of tree cover following restoration, and its success measured against this target.</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>Existing SSSIs should form the 'core' of any open area, with the most rigerous objectives. Their conservation objectives could be changed to allow a more dynamic approach only when the area of MATURE open habitat restored around them was large enough to ensure that there was still a NET GAIN of mature, species rich open habitats. (To me, this sounds otherwise like a way of shifting the balance of existing open habitat SSSIs towards more forestry, quite the opposite of the stated goal of this policy).</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>

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?
<p>I prefer: Realising the wildlife value of potential open habitat under woods and forests</p>	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
<p>'We could adopt a softer approach and encourage the inclusion of woodland expansion.'</p> <p>Rigid 'like for like' formula will only be a way of delaying / avoiding the creation of open habitats. And, in places like Norfolk, the forestry commission established plantations of a great deal of the available 'poor land', leaving reduced scope for compensatory planting as much would have to be on high-value farmland.</p>	
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?
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
<p>Some Forestry Commission plantations are on land that is leased under 999 year agreements (i.e. effectively indefinitely!). Yet these leases usually / always stipulate a minimum tree cover. The Commission MUST be able to re-negotiate these leases to facilitate the restoration of open habitats where desirable.</p>	
Other comments	
<p>We welcome your input on any other aspect of this consultation.</p>	
<p>.</p>	

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

Please send your completed forms to:

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

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.