

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:	Philip Sansum/Andrew Wright
Your organisation (if any):	High Weald AONB Unit
Date:	4 th 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?
<p>The rate of removal of woodland should be less than the identified 'Middle' option in order to avoid net deforestation. Re-afforestation in the UK is a success story despite afforestation that has taken place in inappropriate places. The woodland cover achieved in England should not be eroded and FCE need to ensure this. However, an awareness of the diversity of landscape types - both natural and historical - present in England needs to be built into the centre of this policy. Although national net deforestation must not occur, the policy will, in order to be effective in its purpose, in some landscapes (i.e. where there is a very high proportion of planted and recent secondary woodland occupying potential open land HAP habitats), necessarily effect local net deforestation in some districts and perhaps even at regional level. In some cases these landscapes will correspond with both large and heavily populated areas of the UK. The policy will have hard work to do to strive for acceptance of this fact - unpalatable to many inside and outside forestry - but the justification comes in the form of the long term benefits to society of improved biodiversity and ecological services.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Yes, they seem reasonable. A further possible significant outcome is the considerable opportunity not just for restoration of semi-natural open land habitats but for restoration, on either small- or large-scales, of the attendant sustainable land management systems and techniques, outputs and markets which traditionally maintained these habitats. A second further outcome would be the restitution of public access to greenspace - e.g. on former commons currently occupied by impenetrable birch and pine thickets and perceived as inaccessible. Locally this has the potential for very considerable social benefits. A third</p>	

No	Question.
	<p>outcome will be the increased environmental and historical landscape awareness that restoration schemes will bring to local communities. As open land habitat is restored there will sometimes be considerable educational opportunities to help foster a local sense of place and environmental stewardship.</p>
<p>Measuring the success of the policy</p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
<p>Additional indicators:</p> <p>Timber Sector: effect on local markets e.g. woodfuel and local sawmills due to large scale deforestation projects.</p> <p>Woodland Biodiversity: effects on woodland connectivity in areas where restoration of open land habitat has been undertaken. There is potential for loss of woodland connectivity, but on the other hand, for improved ecological functionality at landscape scale which could, counter-intuitively, benefit woodland biodiversity. Monitoring of these ecological changes would provide a further indicator for evaluating the 'Ecological communities...' outcome.</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>Yes. Yes. 'Potentially' needs to be emphasised, however, as the approach to transitional areas taken by the policy is critical. We note that this assertion would not detract from the high conservation status afforded to ancient woodland (below). Public perceptions of this have to be managed carefully though and promotion of the idea will be necessary in gaining support for open habitat restoration and expansion.</p> <p>The policy should attempt to overcome the difficulties in evaluating success associated with transitional habitats such as wood-pasture, scrub and 'wood-heath' which do not easily categorise into either wooded habitat or open habitat for monitoring purposes.</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. We welcome the reaffirmation of the commitment to avoiding future loss of ancient woodland. Other long-established native woodland has significant scenic, amenity and cultural and natural heritage value and also represents a 'future ancient woodland resource'. The extension of a presumption against removal of other mature native woodland is therefore a sensible safeguard which should insure against the inadvertant erosion of the biodiversity and other values afforded by the long-established woodland resource. We feel the definition of 'mature native woodland', however, requires careful consideration and interpretation.</p>	

No	Question.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	<p>On the basis that proposals which include removal of "mature native woodland" would 'normally be refused' this is a critical definition. However, we feel it may be inappropriate to impose the same criteria rigidly across all landscapes nationally - though we appreciate that guidelines must be published. From the High Weald (and Wealden in general) perspective, a strict adherence to a threshold stand age of 80 years would preclude open land restoration on many sites where there is a very strong historical and ecological rationale for it and great potential gain in terms of strengthening traditional habitat mosaics and increasing the transitional habitat elements supported by the previous discussed policy element (6.1.1). Some flexibility, or broadening, of the definition to include stands > 100 or 150 years growth would be desirable where there is appropriate historical-ecological evidence supporting open land habitat restoration proposals. In the High Weald AONB, historical map evidence indicates that significant areas of ancient heathland, unimproved pasture, meadow and wood-pasture were 'lost' to secondary woodland succession or planting during the 19th century. These sites are often in very close apposition with ancient woodland, trees having in-filled small-scale open land-woodland mosaics, smoothing over transitional habitats and to some extent locally eroding the fine-grained and intricate historical land-use patterning which is a key feature of the reason for the AONB's protected landscape designation. In a landscape relatively well endowed with ancient woodland it would be a lost opportunity not to consider well informed proposals for small scale removals of recent native woodland on the basis of a rigid stand age criterion. In summary, we propose that while 80 years is perhaps a useful dividing line between recent invasion of open-land habitat (where potential restoration gains are likely to be greater) and well established woods where the 'cons' of loss become more significant in many English landscapes, a more flexible approach would be required in others (particularly heavily wooded districts and regions)</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>Yes, it is necessary and important. Organisations wishing to carry out restoration projects should involve locals at the earliest stage i.e. development of proposals.</p>	
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
<p>Yes, given the need for awareness of regional and local landscape distinctiveness when appraising restoration proposals this is not only appropriate but necessary. However, FC need to ensure that the regions are working to the same principles and procedures at a national level even if decision criteria are tailored to differing regional priorities.</p>	
<p>We will apply a framework for evaluation to projects</p>	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?
<p>Yes, it should be imposed where there is any doubt as to the likely success of the project</p>	

No	Question.
	in terms of benefits.
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?
	The need for evaluation should be recognised by practitioners and addressed in restoration proposals. However, clear guidance needs to be developed and offered by the policy makers. Depending on the level of input required for effective evaluation, commitment of funding should be considered for some projects. Good quality evaluation is key to determining the effectiveness of the policy and informing the nature of any amendments to it which may be necessary in the future. It is especially important that evaluation is not under-supported at the early stages of the policy.
<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.</p>	
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?
	Threshold is fine but losses and gains of woodland should be reviewed against national inventory reporting and the threshold rate adjusted accordingly. The approach should use a combination of 'netting off' projects or to require compensatory woodland creation projects and judicious timing of woodland removal to keep overall loss below the threshold. However, there will be a logistical challenge here in that balancing losses and gains of woodland cover will, in some cases, need to be managed across Forest districts and/or regions - not solely within them. We do not think that the threshold should be imposed on a regional as well as a national basis - although determining guideline regional thresholds - which would vary widely according to the landscapes under consideration - could be a useful check.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	Threshold is acceptable. It needs to allow for significant impacts to be made - in addition to the restoration of unfavourable condition open land SSSIs - in the wider English landscape at the same time as preventing net loss of national woodland resource. The evidence paper suggests that this will be the case.
<p>Key variables</p> <p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
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?
	Perhaps not in the very short term but consider commitment of funds to implementation of ecological monitoring schemes coordinated with restoration projects. These would contribute both to estimating biodiversity change associated with different levels of restoration/expansion and provide evidence needed for evaluation of policy success against the indicators set out in the consultation document.

No	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 outline practices presented? How could we best ensure that such practices are adopted?
	Yes, this should be written into the EIA/FLA conditions by the FC with agreement of the applicant.
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?
	<p>In theory yes, but in practice this might be difficult to do meaningfully.</p> <p>Include impact on long-term average carbon store only if scientific evidence available to make reliable calculation. It seems to be implicit in this question that woodland loss necessarily equates to loss of long-term average carbon store. We note that this is a very complex area and many variables need to be considered, including the nature of the crop, length of rotation, eventual fate of the timber/produce, distance and means by which transported, soil type etc. Some heathland soils have significant carbon sequestration value, whereas short rotation coniferous forestry for pulp is in no way equivalent to old-growth semi-natural woodland in terms of long term carbon stores.</p> <p>The work of the Forest Carbon Review is going towards filling the evidence gap on carbon substitution but the assumptions on carbon substitution still seem too large to be useful for informing the path of habitat management policy. Is the loss of potential to substitute timber for higher carbon materials and fuel likely to occur within the 15 year outlook of the policy targets? Is the uptake of such materials from the managed forests - those not eligible for open land restoration - likely to become saturated during this period? If not then this should not be included.</p>
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 net loss of woodland cover can mitigate this. Also, the use of the framework suggested above (Q's 9 & 10) will help judge the success of projects in terms of biodiversity. Restoring open-land habitats and the management techniques associated with them may have complex and unforeseen positive implications for carbon emissions. Over-detailed attempts to balance biodiversity gain against estimated carbon budgets are unlikely to be meaningful. Employment of the 'no net deforestation' threshold at national level, although simplistic, may be the most practical approach to making this judgement.
	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

No	Question.
	where success for all sites is based on assessments of condition as applied to SSSIs?
	<p>Yes, equivalent or greater gains could be made under some circumstances. In others, adoption of a more dynamic approach might simply be more compatible with the long term viability of maintaining open land habitat, especially within large forestry complexes, and therefore have greater gains in real terms than striving for a static prescribed condition based on SSSIs which cannot be upheld in perpetuity.</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>Should be approached on a site by site basis depending on the important features present. It is important for the site to be properly surveyed in terms of flora, fauna, archaeology, hydrology etc. before proposals are finalised. We do not consider that all restoration proposals should be judged against favourable condition criteria as defined for SSSI habitats. We see the development of this policy as potentially part of a new, landscape-scale, dynamic approach to biodiversity management which should complement the established SSSI approach rather than emulate it.</p> <p>The scope for modifying conservation objectives on SSSIs will become more apparent after this policy has become established and its results evaluated. It is not appropriate to modify SSSI objectives based on the findings of this consultation alone at the policy outset stage (although there may be strong evidence-based reasons for a change of approach on many individual sites - this is a separate issue).</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></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>NO. 3 may need to be primary. At the head of pg 37 the statement is made that elements of all three approaches may appear in the final policy. However, it seems clear that elements of all three approaches must be integrated in the final policy.</p>
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
	<p>In heavily wooded districts compensatory planting will not necessarily be appropriate and could be counterproductive to the aims of the policy. On the other hand, in regions of low woodland cover, compensatory planting is often likely to be the most effective mechanism for achieving no net loss of woodland - especially in settings where the</p>

No	Question.
	development of dynamic habitat mosaics (as referred to in 6.1.1 and addressed by question 4) to deliver the required targets for open and wooded land are impractical or inappropriate. In these areas, compensatory planting of a similar woodland type to that being removed, or the most appropriate type of native woodland for the area, should be undertaken in the region/county where the deforestation takes place.
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?
Fine.	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Other comments	
We welcome your input on any other aspect of this consultation.	
<p>We note the latitude of the definition of woodland in the UK agreed under the Kyoto protocol. This would allow for significant restoration of open land habitat within woodland without necessarily constituting 'deforestation'. This policy is about the balance between open land and wooded land. The potentially very important role of the wood-pasture and parkland priority habitat - which represents an intermediate - in this policy needs to be explored more and addressed. This is currently absent from the consultation document presumably because, in policy terms, wood-pasture and parkland is assessed as 'woodland habitat'. However, in actual terms it is transitional. The policy should consider supporting restoration of wood-pasture and parkland (and 'wood-heath') habitat from recently established high forest in some circumstances as a 'third way' in which open-land biodiversity benefits can be delivered without compromising the UK commitment to maintaining current levels of 'woodland'. Recognising that wood-pasture and parkland will not normally be assessed under open land HAP types, mechanisms for monitoring this would need to be developed.</p>	

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

Please send your completed forms to:

[Dominic Driver](#)

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

By 17.00hrs, Friday 5 June 2009.