

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:	Nick Hoare
Your organisation (if any):	
Date:	17/5/09

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?
<p>No. I can think of very few circumstances where conversion of woodland to open habitat would be wise. The consultation document lays out effects quite fairly. We are comparing an unquantifiable gain in open habitat species with a reasonably quantifiable cost in government support for management of open land, loss of economic activity and jobs, and reduction in carbon sequestration and substitution.</p> <p>I cannot possibly see the justification for spending taxpayers' money on a policy which has clear negative effects on climate change, the greatest environmental threat we face, to meet the demands of, in essence, one pressure group: the RSPB.</p> <p>I do not believe in excessive control over what owners do with their land, however. If the RSPB, or any other owner, wish to clear woodland and maintain as open habitat at their own expense they should be free to do so, subject to compensatory planting. It may even be rational for some of the public forest estate to be sold to such bodies for this purpose.</p> <p>The key point I wish to make from a personal perspective is that for a single penny of my tax to be spent on a policy which will have a negative effect on my children's economic and environmental future is not acceptable.</p> <p>Are we so much wiser now that we should spend public money to undo what we put in place with public money 30 or 40 years ago?</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
Yes	

No	Question.
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?
Using the area cleared as a measure of success of the policy of woodland clearance is an invalid circular argument. The only measure of ecological success is the species population trends.	
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?
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'?
Yes	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
OK	
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?
Yes. It will be important to put up notices at the actual sites to make people aware of any consultation.	
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?

No	Question.
	<p>Unless a numerical basis can be set to weigh up the predicted benefits and costs, it will be a meaningless subjective exercise.</p> <p>e.g. One nesting pair of nightjars is worth £1000 of public support.</p>
10.	<p>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>
<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.	<p>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>
	<p>Needs to be regional</p>
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
	<p>Much too high. It also takes no account of the productivity of the woodland. Replacing productive conifer woodland with less productive (and at high risk from squirrels) broadleaves does not help from an economic or carbon perspective.</p>
<p>Key variables</p> <p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
13.	<p>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>
14.	<p>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?</p>
	<p>Not felling before maturity makes sense. The rest of the measures will make no difference. Any material left on site will release its carbon, whether by burning or decomposition. If fuel is used to shred or mulch this will increase carbon output.</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>
<p>Absolutely</p>	

No	Question.
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?
	Carbon emissions should take priority. Climate change is the biggest threat to biodiversity. There are worthwhile environmental projects which benefit climate change and bio-diversity; effort should be concentrated on them.
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?
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?
	The South West already struggles from lack of "critical mass", leading to much of the timber produced being trucked out of region for processing, or being uneconomic to harvest. Any reduction in scale, or even a threat of it, reduces confidence for processors to invest.
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?
	The first, managing existing resources better is preferred. Creation of more habitat that is costly to maintain at a time when the European economy is in a mess, and many governments have taken on debt that will take them decades to pay off is foolhardy. There is no guarantee that current environmental funding will be available in the medium or long term.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	It needs to be like with like.

No	Question.
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?
<p>The creation of open habitat cannot be a measure of the benefit of creating open habitat: species population effects are what count. Apart from that the questions are reasonable, but without objective means of weighing one against the other they mean nothing.</p>	
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.	

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.