

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:	Mrs. Margaret Phipps
Your organisation (if any):	Hurn Parish Council
Date:	2 nd June 2009

No	Question.
The nature of the change	
1.	<p>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> <p>Our preference is the lower level of intervention, however, we believe that certain areas/locations should have no intervention at all due to local circumstances (see our answer to question No. 8). The level should be low (370 ha per year over 10-15 years) for several reasons:</p> <p>a) The initial cost to convert woodland to open space is calculated at an average of £1,164 per ha, and then typical ongoing management costs are stated at £200 per ha per year, in perpetuity, (consultation document page 13). The majority of this money will be a cost to the Government, that is, the taxpayer. This is an extremely high cost, for what will be to the benefit of only a small amount of people. Conservationists are keen to exclude the general public from open habitat sites and divert them to other recreational areas, so generally there will be no public benefit, and a high cost to the public (the taxpayer). Whilst appreciating the importance of ensuring current levels of open habitat are not lost, any expansion should be kept to the minimum.</p> <p>b) We understand that currently England only produces approximately 10% of its own timber and 90% is imported. If this policy is implemented at a high level, with mass felling, once that felled timber stock has been used up, then England could be totally reliant on imported timber, making it very vulnerable in the economic market. Felling at the higher level is not compatible with sustainable timber production, or the negative carbon emission factor of importing timber.</p> <p>c) The consultation document on page 15 notes that the likely carbon balance impact of tree removal is negative. This, in itself, is unacceptable, so if the policy were to be implemented, it should be at the low level to reduce the impact on England's total carbon emission targets as set out by the Government.</p> <p>d) To fell trees at the higher level would be a massive and unjustifiable "leap of faith". We are not aware that such a policy of tree removal has ever been implemented</p>

No	Question.
	<p>before, except perhaps in the rain forests, and the Government should take a “softly softly” approach by adopting the lower, and less costly level of intervention. To rush headlong into a policy of high level felling could be economically, socially and environmentally catastrophic.</p>
<p>Desired outcomes</p>	
2.	<p>Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?</p>
<p>We comment below on each of the desired outcomes listed on page 19 of the consultation document:</p> <ul style="list-style-type: none"> • Ecological communities able to cope with threats. We do not agree with the reasoning behind this outcome. We agree that ecological communities should be able to cope with threats, however, the document states that the main threat is climate change. The policy of woodland/forest removal will accelerate this problem and promote climate change via negative carbon balance (consultation document page 15). • Financial viability. We would like to see an amendment to this paragraph to mention the negative financial viability of perpetual open habitat management, as opposed to woodland/forest management which has a fundamental benefit of growing a sustainable resource. • Keeping to Government commitments on woodland cover. We agree with this statement but believe that the text should go further to include that England should not be satisfied to have only 9% woodland cover, which is the lowest in Europe (consultation document page 28). England should have an aspiration to increase its sustainable forest/woodland which would enhance the Government’s credibility in international negotiation on climate change and forestry. • Positive engagement by local and other users. We wholeheartedly agree with this desired outcome and believe it is very important that local people should be listened to. • Carbon balance. We agree with this desired outcome but believe that the paragraph should be extended to include the statement on page 27 of the consultation document – “The UK Government has international commitments to avoid deforestation associated mainly with supporting international efforts to combat climate change”. • Timber sector activity. We agree with this desired outcome, but do not see how it can be achieved if the higher level of intervention is adopted, and vast areas of England’s sustainable forest/woodland is permanently lost. The only alternative to maintain the businesses which work and rely on the timber industry, would be to increase imports, resulting in a negative carbon emission impact. • Woodland biodiversity. We agree with this desired outcome. <p>We would like to add the following desired outcome:</p> <ul style="list-style-type: none"> • Positive public benefit. Each area considered for open habitat expansion should be appraised to ascertain whether there would be public advantage or harm from implementation of the policy. 	
<p>Measuring the success of the policy</p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to</p>

No	Question.
	suggest any amendments to this indicator list?
	<p>Under the heading "Outcome" there is - positive engagement by local and other users. Another Indicator should be added to this section as follows: - "Monitor/obtain feedback during implementation of the project, from local residents living in the proximity of, and recreational users of, areas to be affected by this policy". The proposed indicators are not clear and appear to point to a process that can filter out the need for local engagement after the scoping stage of an EIA.</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>The above statement should read "woodland/forest" and not just woodland.</p> <p>Yes, we do agree that woodland/forest and open habitats are potentially mutually beneficial. We question the "promotion" of the idea as "support" for tree felling. If the concept of open habitat restoration is valid then it should not be necessary to "push" for support, a straightforward factual explanation of the "mutually beneficial" case, should suffice, and people can make up their own minds to support or oppose the policy.</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 agree with the principle, however we would like to see an amendment to the heading and definition of 'mature native woodland'. This should be 'mature British native trees'. This would then include mature Scots Pine, some of which are immensely environmentally important in certain locations. Indeed we are aware of Natural England sites where mature Scots pine are protected, and many Local Authorities have areas of mature Scots pine with Preservation Orders on them. These mature trees should not be sidelined and treated as scrub. We would like to see the definition of a mature tree changed from 80 to 60 years. A 60 year old tree is mature "in anybody's language".</p>
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
	<p>As per answer to question No. 5. We believe the definition is incorrect and should be 'mature British native trees', to include "sites currently composed of British native broadleaves and conifers that have been wooded for at least 80 years etc.". Mature Scots pine is equivalent to other mature trees in so far as carbon sequestration, wildlife value, amenity value and aesthetic landscape value. Our observation is that the public do not differentiate between different tree species – a mature tree is a mature tree.</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>

No	Question.
	<p>We agree that local participation in decision making is absolutely essential. If there is no local consultation, practitioners could face intense opposition to their proposals, and communities could feel threatened and dictated to from "on high". Our preferred option is engagement with the lowest level of community groups, such as Parish Councils and Residents Associations. They should be given full details of proposals and then given sufficient time to consult with local people and obtain their views. It is also very important that practitioners take note of what communities are telling them, and do not ignore their opinions, as has happened in some areas in the past.</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>
	<p>No, we do not agree that woodland/forest removal should be prioritised at a regional level. Regions are too vast. Each area which is to be the subject of a felling licence, in whichever region, should be looked at individually in relation to its topography, hydrology, and in particular its carbon sequestration requirements proportionate to its economic/transport/leisure/tourism infrastructure. Prioritisation of regions could result in the loss of the current dynamic landscape and result in abnormally large man-made scenes requiring constant and costly management intervention.</p>
<p>We will apply a framework for evaluation to projects</p>	
9.	<p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>
	<p>We suggest one change and two additions to the framework for evaluation.</p> <p>We do not agree that the first heading should be "the problem". It may not be accepted by all that there is a problem. Instead we propose the heading should be changed to "the challenge" (as per the heading of item 3.1, page 8 of the consultation document).</p> <p>As an addition we suggest the inclusion of a heading "financial appraisal". This would ensure that as the framework is implemented, an evaluation would ensure that it is within achievable financial parameters.</p> <p>The second addition is the inclusion of a heading "local opinion appraisal". This would mean that a Parish Council or Residents Group could feed back local opinion into the evaluation process.</p> <p>Our preferred option for applying this element is No. 2 on page 26 of the consultation document – "We could insist on using the framework as a condition of funding".</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>On commencement, during implementation and at completion, there should be ongoing</p>	

No	Question.
	discussion and contact with the local community. In this way, practitioners are more likely to receive support from affected communities.
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>The underlined heading above states “we will try not to go over a threshold ...”. We do not believe this is good enough. If a threshold is set then it must be adhered to. Please note the wording in the consultation document, page 27, para. 6.1.6 – “The UK Government has international commitments to avoid deforestation associated mainly with supporting international efforts to combat climate change”. Therefore any threshold must be abided by or regarded as an upper limit, certainly not exceeded.</p> <p>That same para. Goes on to state “High standards of woodland management in the UK appear to help the UK Government’s credibility....”. We believe this should be more positive to state fact rather than opinion, i.e. that “woodland management ...does help the UK Government’s credibility.....”</p> <p>Yes, we do agree with the principle of a threshold rate, as long as it is the lower level, and it is adhered to. We refer you to our Answer No. 1 which states our preference as the lower level of intervention or in some circumstances nil intervention due to local circumstances.</p> <p>With regard to our preferred mechanism, please note that we only agree with the fifth mechanism, and comment on the options as follows:</p> <ul style="list-style-type: none"> • Suggestion - review losses and gains of woodland according to national inventory... Comment – We do not agree, levels must be ascertained at a local level with local participation. • Suggestion – allow projects on a first come first served basis ... Comment – We do not agree, and feel that this option could be open to abuse, i.e. who decides on priority and how are the public advised and involved? • Suggestion – adjust timing of woodland removal to keep overall rate below threshold. Comment – We do not agree, could be seen to be massaging the figures and may not be transparent. Could be seen as placating local opposition until such time as any furore had died down (timing) and then implementing the policy regardless. • Suggestion – could ‘net off’ woodland creation projects against removal for open habitats. Comment – We do not agree, again could be perceived to be massaging figures, transparency is essential. • Suggestion – require planting of equivalent area of woodland as compensation for loss. Comment – YES, WE AGREE. This is a good idea, as there will then be no loss of woodland and funding is available, not only for planting but for management as well (para 6.3.4). • Suggestion – apply threshold on a regional as well as a national basis. Comment – We do not agree and refer you to our answer No. 8 	

No	Question.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	<p>We cannot see in the consultation document an actual “proposed threshold”. We can only see the option of woodland/forest removal threshold between the ranges of 370 to 3,000 ha per annum over 10-15 years. Our preference is the lower threshold of 370 ha p.a. (see answer No. 1). As already stated in answer 1 we consider that even this lower threshold would be too high in certain areas, and each location should be considered on its own merits (see our answer to question No. 8).</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.	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>We would refer to the last paragraph on Page 29 of the consultation document – “there is great uncertainty over the magnitude of the net benefit from a given amount and type of open habitat restoration or expansion”. We would then refer you to our response under (d) to question No. 1. We believe that higher threshold felling would be an unjustifiable “leap of faith”. We do not see how any level can be set until scientists have more knowledge about the effects of felling so many trees in England. Once felled, the benefits of an established tree are irreplaceable in the short term and will take decades to substitute. We note the next line of the last paragraph on page 29 – “A commitment to a framework for evaluation should gradually fill this evidence gap”. We believe this is not good enough, it is not clear nor positive. The words should and gradually show doubt in the policy. There is no room for doubt in proposals for mass tree felling. It will be too late – when trees are gone, they are gone! The responsible way forward is to wait until there is proven scientific evidence, that is, no evidence gap, before proceeding with this irreversible and radical policy.</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?
	<p>If this policy were to be implemented, then obviously we agree with management practices to minimise carbon emissions. However we would point out that the whole process is carbon negative and is not compatible with the UK Government’s responsibilities and commitments on climate change. We note that:</p> <ul style="list-style-type: none"> a) Felling – results in a major loss of carbon absorbing trees b) Restoration performance is a carbon producing activity, even if minimised c) After restoration – open habitat absorbs less carbon than woodland/forest, as noted on page 30 of the consultation document under the heading ‘long term average carbon store’.

No	Question.
	We do not feel able to comment on the outline practices presented, until the “evidence gap” has been filled by satisfactory research, and proven information is available, so that we can make a sensible judgement.
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 – 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?
	The need to reduce carbon emissions is paramount and should take precedence over achieving biodiversity objectives. However, having said that, a degree of balance could be achieved by a “very softly softly approach” to this policy. Please refer to our answers to question Nos. 1 (d) and 14. If climate change is not addressed as a priority, then biodiversity objectives will be threatened anyway. It is not common sense to try to protect certain species by making the overall situation worse. Don’t throw the baby out with the bathwater!!
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?
	<p>Woodland management for sustainable timber production already delivers a shifting mosaic of woodland and open habitat. We do not believe that open habitats outside of SSSIs should be kept in ‘favourable condition’. At this point we would mention that we have not seen a definition of ‘favourable condition’ and understand that the requirement for that status (whatever it is) is not set out in any legislation. The term appears to originate from a European Habitats Directive. Also favourable condition targets are not set for individual SSSIs. It is often forgotten that whilst public bodies are required to have regard to nature conservation, they are also required to uphold the general principle of balancing the public interest between competing benefits.</p> <p>If areas of open habitat outside of SSSIs were to be kept to the same standard of ‘favourable condition’, then the public would be marginalised. It is already Natural England policy to deter the general public from walking/exercising dogs/cycling/horseriding on open habitat SSSIs which are open to the public, and to this end they have been promoting alternative “mitigation” areas in many localities where the public should be encouraged to go instead of the SSSI. These alternative areas are termed “robust”, and many of them are Forestry Commission sites, which have areas of open habitat as well as woodland/forest. If these alternative open habitat and woodland areas were to be managed in the same manner as SSSIs, i.e. ‘favourable condition’, then there would be nowhere for the public to go for recreation. There must be sensible balance between nature conservation and public amenity. We favour the dynamic landscape of a shifting mosaic of woodland and open habitat, which benefits many species of wildlife, protected and otherwise, and also the general public. It also allows for</p>

No	Question.
	sustainable timber production and maintains the UK carbon balance.
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?
	We do not agree that all restoration proposals should have an endpoint as per SSSI habitats. This could result in exclusion or restriction of access for the general public, such as walkers/dogwalkers/cyclists/horseriders, to these areas as well as SSSIs. Please see our answer to question No. 17.
<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.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
	Please refer to our answer to question No. 1 (b).
<p>Different approaches to applying policy</p>	
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?
	Approach No. 1 is our preferred option.
<p>The role of compensatory planting</p>	
21.	What is the appropriate role of compensatory planting in this policy?
<p>AT LAST! Almost finally, at question No. 21, the author of the consultation document has recognised the value of trees for carbon sequestration, wildlife, amenity/leisure and aesthetic landscape value, by the proposal for compensatory planting. We would comment on the various ways in which the policy could be applied as follows:</p> <ul style="list-style-type: none"> • Suggestion – look for ways of imposing a condition of compensatory planting as part of accepting woodland removal. Comment – we agree wholeheartedly. • Suggestion – adopt a softer approach and encourage the inclusion of woodland expansion. Comment – we agree wholeheartedly. • Suggestion – insist on formal commitments to plant compensatory woodland etc. Comment – we agree wholeheartedly. • Suggestion – look for compensatory planting close to woodland that is being lost, or somewhere else in England. Comment – compensatory planting must be local to where any woodland is lost. • Suggestion – look for planting that replaces like for like or replace with native woodland. Comment – replacement with a mix of British native trees. <p>The policy of compensatory planting makes economic sense, with generous grants</p>	

No	Question.
	available not only for planting, but for woodland management.
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>We believe the set of questions are reasonable, however we would suggest a few changes and an additional question:</p> <p>a) Ecological communities able to cope with threats. The first question should be should more open habitat be developed? Instead of will more open habitat be developed?</p> <p>b) Long term viability. The first question is incorrect – to what extent will long term delivery of public benefit rely on long term public funding? This question assumes that open habitat is to the public benefit and this is not always the case. In fact in some locations, formation of open habitat rather than woodland/forest is to the detriment of the general public.</p> <p>c) Woodland biodiversity. The second question should read mature British woodland rather than native woodland.</p> <p>d) Carbon balance. We would like to see a further question under this heading, as follows: Should this policy proceed at all, before the evidence gap relating to carbon loss has been filled by satisfactory research?</p>
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	<p>Yes, we believe you have missed a very important point which should be included in section 6.5.5 Research and Evidence. There is no reference made to the evidence gap outlined in the last 2 paragraphs on page 30 of the consultation document. Those paragraphs refer to long term average carbon store and substitution. Research and evidence should include the consequences to the environment, of the net loss of carbon absorption which will result if this policy is implemented at any level.</p>
Other comments	
	We welcome your input on any other aspect of this consultation.
	<p>This consultation document anticipates “high quality local participation”. We believe that you will achieve very little local participation, whether high quality or otherwise, because of the complicated nature of the document. Two Parish Councillors and one local resident spent four and a half hours discussing the 23 questions. It then took approximately 4 hours overall (in stages), to type up the draft responses for circulation to all Parish Councillors. You could add at least another hour on to that for amendments after receipt of Councillors’ comments, plus posting of document etc. etc. That is a total of nine and a half hours (and it was probably a bit more), spent responding to this consultation. It is our opinion that a member of the general public would not be bothered to take that time. In fact, this Parish Council circulated details of the document website in its Newsletter and gave out some hard copies, and the feedback we have received is that local people will not respond because of the complexity of the document, and the time they would have to spend trying to understand it.</p>

No	Question.
	<p>It is our opinion that this could create a problem, in that only those with an “interest” in this proposed open habitat policy will reply to the consultation, i.e. conservation organisations who are in support of the policy. This could result in an unbalanced response to the consultation.</p> <p>The ‘ground level’ local view of this Parish Council, is that many local residents ARE concerned about the issue of mass tree felling for open habitats, but will not respond to your consultation for the above reasons.</p>

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.