

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:	Mr. D. Brackley and contributions from: Mr. P. Jepson and Mr. S. Brereton (Joint response on behalf of Lancashire County Council's Natural and Historic Environment Service team)
Your organisation (if any):	Lancashire County Council (Environment Directorate - Natural and Historic Environment Service)
Date:	3 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>Yes, with a preferred level of intervention resulting in no net deforestation as a direct consequence of the policy.</p> <p>Ideally the impact of FC policies overall would be to increase woodland cover in England so that the proposed restoration of open habitats from woodland would be outweighed by woodland creation addressing other policy objectives, rather than simply relying on compensatory planting for the policy in question.</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.	
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?
<p>Yes, except for the omission of a landscape change indicators . The addition of landscape change indicators would address the suggested issue of the policy not paying sufficient attention to the potential landscape impacts of removing woodlands. (Please also see</p>	

No	Question.
answer to Q.23).	
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?
Yes. Promotion of the idea may not necessarily be required to gain support, but the provision of advice and best practice examples would help practitioners understand the concept and to realise the aims.	
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'?
Acceptable.	
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. 'Evidence of high quality local engagement before we consider proposals' is the preferred option (1) and option 3: 'develop guidance and commit funding' is equally important.	
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, the Regional Forestry Frameworks and adopted sub-regional woodland strategies (e.g. the Lancashire Woodland Vision 2006 - 2015) should assist with setting priorities.	
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?
Yes, although 'long term monitoring' should not be an optional extra but integral to the framework. The evaluation framework should be aligned with the requirements of the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 in	

No	Question.
	order to demonstrate consistency of approach to deforestation.
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?
	Technical guidance and financial support.
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?
	Yes. The threshold should be adjusted to ensure no net loss of woodland as a consequence of the expanding open habitats policy. This may require adjustments to the National Inventory of Woodland and Trees to capture in more detail the changes in woodland cover to a greater degree of accuracy.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	The threshold should be determined by the principle of no net loss of woodland cover (attributable to the open habitats policy), based on comprehensive and accurate national woodland inventory data.
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>Projects for woodland removal under this policy should be targeted at sites where there will most likely be benefits to recognised ecological networks. These will include sites where there are elements of the desired open habitat vegetation already present.</p> <p>Ecological assessments and monitoring are also required and there should be long term management plans to ensure the restored habitats develop appropriately and are maintained.</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>Yes. Yes.</p> <p>Ensure best practice is adopted by including the actions in agreed plans of operation within the management planning process.</p>

No	Question.
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?
	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 balance lies in the synergy of the open habitats policy with other policy driven initiatives seeking to reduce carbon emissions.
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?
	Not answered.
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?
	In localities where woodland cover is already low and other factors (physical, economic or social) reduce further still the available sustainable supply of timber, loss of woodland due to the open habitats policy may jeopardise the viability of small scale timber enterprises.
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>Approach 1: 'Making sure that the land can be managed in the long-term'.</p> <p>There is merit in adopting the suggestion in the alternative approaches of conducting studies to increase the evidence base (e.g. on relative weighting given to carbon dioxide emissions or the affect on timber supply) before deciding or adjusting the scale and rate of woodland removal.</p>

No	Question.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
<p>Compensatory planting should be imposed where, on a case by case basis, it is feasible and desirable in that locality. However there will be occasions where reliance will need to be placed on allied policies to help deliver the 'no net loss' condition.</p> <p>For example there could be significant landscape impacts if a national scale 'like for like' approach was adopted whereby non-native coniferous planting was imposed on an area where it was inappropriate for its landscape character.</p> <p>There should be no additional burden on practitioners, except where the proposed land use changes result in net financial gain, and grant regimes should where necessary be adjusted to allow for this.</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?
Yes. No.	
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, there are gaps in the landscape evidence base which need to be addressed:</p> <p>a) Consideration of the issues relating to landscape character impacts arising from open habitat restoration.</p> <p>b) Development of landscape sensitivity criteria for use in deterring significant landscape character impacts arising from open habitat restoration.</p> <p>c) Landscape capacity studies to identify broad areas of search and possible pilot areas.</p> <p>d) Develop a set of indicators for monitoring impacts on landscape character.</p>	
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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¹ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.

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By 17.00hrs, Friday 5 June 2009.