

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:	Anne Goodall
Your organisation (if any):	Lincolnshire Bird Club
Date:	17 May 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?
Given that some level must be set, in order to provide a workable plan, this appears reasonable. Clearly there will be large annual/regional differences, which will emerge as the programme proceeds.	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
The list is reasonable. No amendments suggested	
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?
For the first outcome, add "Trends in populations of UKBAP species associated with woodland habitats". Also, work to develop an indicator based on connectivity, for both open and woodland habitats. For the last outcome, the indicator is too restrictive. Significant woodland biodiversity is associated with certain non-native woodlands. The reference to 'native woodland' should be expanded to include other woodland of established high biodiversity value.	
Policy proposals	
Elements present in the policy	

No	Question.
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?
Very much in agreement with this idea, and with the usefulness of promoting it to gain support. In certain areas it should form part of a wider plan for extending a woodland/ open space mosaic beyond the existing wood, as well as within it.	
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, as long as this is interpreted sensibly; many ancient woodlands have lost glade, ride and laund systems whose reinstatement might benefit biodiversity. With this caveat I would expand this to a presumption against removal, certainly extensive removal, of any mature woodlands of known high biodiversity value.	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
Would be uneasy about any definition which relies only on age. The definition needs to incorporate current or potential biodiversity value for both the existing woodland and the open habitat(s) which will/may replace it; as it stands it is too inflexible.	
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?
Engaged and enlightened participation can be helpful, but finding the right level in any situation can in itself be difficult and time-consuming. There is a normal adverse reaction to change, which is also related to scale and timescale. There is also no one certain way to obtain positive participation (which itself may or may not be sympathetic to the desired outcome) and therefore hard and fast rules or instructions are not helpful. There must however be a basic decision on the desired outcome, and the path to be taken if local opposition can't be 'talked out'.	
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?
Priorities should certainly not be set above regional level, but strategies also need to be in place within regions, which themselves are large and of diverse character. There is scope for incorporating Natural Area planning within regions, for example.	
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>Proper evaluation is essential, and a simple national framework is helpful. A requirement to use the framework is perhaps most simply applied 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>Use of the framework should start with the initial proposals. Worked examples may be one of the most helpful ways to achieve understanding of the method.</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>No, a threshold for woodland removal/creation should be applied at no more than Regional level, with a mechanism to allocate this within a region by reference to biodiversity needs, possibly using Natural Areas. A first-come basis is not suitable, but any of the other methods, or a combination, would be acceptable.</p>	
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
<p>The means of arriving at this threshold seems sensible; the actual figures should be arrived at using this method and adjusted as necessary over time.</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>
<p>It seems unlikely that this will be simple, or even possible, in terms of one-method-suits the whole country, since different species and habitats will respond in different ways.</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>Minimising carbon emissions should be one of the factors considered in planning restoration or expansion of open habitats, but a 'whole-life approach' must be adopted in doing so; some felling practices may make restoration more difficult or time-consuming and require more fossil-fuel-expending management overall. The results of each practice should be considered separately in different situations. Felling of trees at maturity may be sensible providing that prolonging the timescale for restoration it doesn't jeopardise the desired outcome, for example.</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, where the substitution is realistic (eg wood may reasonably be substituted for other fuels, but the potential for use of wood in construction is likely to be more limited) and the calculated values are regularly reviewed.	
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?
There must be no net increase in carbon emissions and providing this is so (ie, woodland planting at least keeps pace with woodland loss, <i>sensu latu</i>) biodiversity objectives should be prioritised. If a net increase in emissions threatens, compensation planting may be necessary.	
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. We can't predict the habitats we shall need in the future and we must therefore maintain the flexibility to develop working mosaics.	
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?
Desired outcome(s) should be incorporated into the evaluation framework rather than fixed condition targets. Such an approach is likely to become necessary on many SSSIs as the climate changes, given variable species response to climate parameters.	
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?
No, this is outside my area of expertise.	
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?
There needs to be a balance between approaches 1 and 2; biodiversity gain cannot be fully realised unless it is possible to manage the new habitat properly in the long-term. This balance should be operated within a cap set by the need to prevent a net increase in	

No	Question.
	emissions,
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	Compensatory planting should be used to ensure that there is no net increase in emissions and no detrimental effect on the timber industry. Where compensatory planting is required for the first reason, such planting should not be automatically required to take place in the same area or region. However, where there are local negative economic impacts, this may be reasonable.
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?
	This is a reasonable set of questions. Some will be more important than others in different regions.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	The list seems reasonable. None are intrinsically unwelcome, but central decision-making, rather than devolved to the level at which different mechanisms could impinge on local biodiversity would be unwelcome.
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.