

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:	Chris Marrow FICFor
Your organisation (if any):	
Date:	5 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?
Somewhere between current and lower levels suggested.	
Forests are managed to produce a very wide range of economic, environmental and social benefits, which include those associated with open space. Open habitats appear to produce a narrower range of benefits. Forests represent climax vegetation types whereas open habitats are sub-climax. The latter have their origins in historical agricultural regimes which are no longer economic and which cost money to maintain. The latter generate revenue at the same time as producing a very versatile raw material which makes a positive contribution to the carbon economy. Most forests created from plantations benefit from having fewer trees and more open space within them, but to produce multiple benefits, which are not usually mutually exclusive, this must be proportional and within the context of a retained forest.	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
It's reasonable.	
One addition should be to ensure that single interest factions currently lobbying for large scale clearance develop a better understanding and appreciation of multiple objective land management, and a greater willingness to compromise to achieve mutual benefits.	
Measuring the success of the policy	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to

No	Question.
	suggest any amendments to this indicator list?
	<p>Seems reasonable.</p> <p>However, these also need to be set and seen against parallel sets of indicators relating to 1) efforts to sustain existing open habitats where these are in good condition and 2) efforts to improve existing open habitats where these are in poor or declining condition. Both of these should be seen as higher priorities than creating more open habitat from existing multi-benefit productive forests. These other priorities need to be considered not just in the context of existing forest habitats, where public or private, but in the context of all such habitats throughout England, irrespective of ownership.</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>Undoubtedly yes, provided the scale of the two habitats is appropriate and proportional. For example, an intimate mosaic of well managed open habitat and forest is likely to produce more benefits at more affordable cost, than either habitat alone (ref 1 above). Again, there are strong arguments for ensuring that what open habitat already exists (both within forests and entirely separate from them) is maintained or brought into good condition before creating more.</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. The principle should also apply to situations where non-native & coniferous forests are developing or have developed more mature characteristics than generally associated with younger plantation type forests (through being retained and managed appropriately over much longer time scales than being felled at young rotation ages based on economic discounting calculations).</p>	
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
<p>see response to 5 above - The definition should be extended to include non-native & coniferous forests which are developing or have developed more mature characteristics than generally associated with younger plantation type forests</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>
<p>Yes, but every situation is different. The key is to ensure a balance representation for identified legitimate interests, so an approach based on stakeholder analysis should be</p>	

No	Question.
	preferred
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?
<p>There is merit in regional priorities being discussed and agreed at regional level partnerships BUT there are serious risks if regions take independent and autonomous views. Regional prioritisation will lead to national level anomalies, conversely national prioritisation will alienate regional views and lead to parochial responses.</p> <p>Regional priorities need to be set against more than just a national policy, there needs to be a national forums for ensuring that what emerges at regional level is sensibly balanced at a national level. For example, the Biodiversity Action Planning process was fundamentally flawed by not adopting such a structure - a plethora of local level BAPs resulted in commitments to delivering far more than national targets, with the result that the local plans and eventually the whole process became discredited.</p> <p>Issues which need to be taken into full account include</p> <ol style="list-style-type: none"> 1) ensuring a balanced approach nationally to productivity losses and conservation gains, taking into full account regional differences between on one hand, forest species composition, productivity (yield class & quality) and on the other hand, distribution of the rarest, most endangered habitats & species. 2) the extent & distribution of existing woodland cover in relation to other habitats at a landscape scale, the contributions currently made to biodiversity interests and the likely resilience of all identified interests to climate change - which is itself predicted to be variable between regions. proper consideration of these issues may require others to take action before forest owners and managers. 3) the views of local people. 	
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?
It is sensible but would need to be applied flexibly, in particular over appropriate timescales	
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?
Such evaluation will be time consuming, expensive and offers no guarantee of a sensible outcome unless well supported with quality facilitation and a preparedness for all participants to be open.	
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

No	Question.
	applied to policy?
	<p>Given that FC's mission is still "to protect and expand Britain's forest and woodlands and increase their value to society and the environment", and that HM Government is as strongly committed as ever to reducing global deforestation and to addressing climate change, it is utterly untenable to even consider policies or actions which could result in net deforestation.</p> <p>A compensatory land exchange mechanism operating at regional level is preferred. It offers the greatest safeguard against net deforestation over time, and could operate within the context of a regional woodland creation / afforestation framework to help reposition forests to address modern agenda priorities. Financial compensation or linking reversion to planning gain in some way (eg S106 agreements) would also seem appropriate if not necessary.</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	We should be aiming to increase woodland cover in England not to reduce it.
	<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 certainly need to, but how is another matter. I do believe we need to consider and assess the potential contribution - and costs - made by restoration against However, these also need to be set and seen against parallel sets of indicators relating to 1) efforts to sustain existing open habitats where these are in good condition and 2) efforts to improve existing open habitats where these are in poor or declining condition. Both of these should be seen as higher priorities than creating more open habitat from existing multi-benefit productive forests. These other priorities need to be considered not just in the context of existing forest habitats, where public or private, but in the context of all such habitats throughout England, irrespective of ownership.</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>The best way of minimising this is to practice sustainable forest management and ensure we replace what we fell. However if clearance is to take place then delaying felling until crops are mature is the sensible approach, and if areas are to be colonised and managed as open ground then brash and arisings does need to be removed from site. Curtain burning at much higher temperatures than open burning is probably the most cost-effective approach.</p>
15.	Do you agree that it is appropriate to include impact on long-term average carbon

No	Question.
	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?
	Too great a focus on biodiversity objectives alone, laudable as they may be, can result in a preservationist approach to conservation which implies we are looking back in time. We owe it to current and future generations to consider land use arguments in the context of future needs and demands rather than historical patterns. Some of the biggest issues facing us today include climate change and population pressure, so the implications of these needs to be given greater weight by far.
	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?
	Again, a more dynamic, flexible approach is necessary - not only to avoid becoming preservationists, but to ensure a more responsive, adaptive approach and capability to dealing with future and changing pressures.
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?
	A fundamental precursor to developing such an approach is an appropriately balanced and responsible approach to multiple-benefit land stewardship, based on optimising underlying commercial management, which recognises that most objectives and outputs are not mutually exclusive.
	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 general link between sustained timber production and active woodland management which improves woodland condition and helps deliver a plethora of economic, social and environmental benefits is well known. All this activity hinges on having active timber markets. The SW has lost around 100k m3 worth of processing capacity in the last 10 years and there is a desperate need for re-investment. Remaining mills trading in specialist markets are doing well, but there is a more general lack of confidence in the sector. Re-investment has mainly been hampered by adverse global trading conditions and now the current economic crisis, and partly because the region's growing stock is very mixed. This, plus the future impact of inevitable rises in fossil fuel prices, suggests a different kind of investment in processing capacity will take place when conditions are right. Any large scale clearance of forest in a region which is particularly good for tree

No	Question.
	growing would set back confidence even further, discouraging the kind of investment required and to the general detriment of active woodland management and resulting benefits.
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>The first.</p> <p>The management requirements of existing open habitat are already causing financial pressures which are likely to be unsustainable in the longer term, so creating significantly more will only add to this at the same time as reducing capacity to generate income from timber. This approach does not preclude the development of further wildlife value.</p>
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	<p>It is likely to play a critical role in enabling or facilitating forest clearance, but there are obvious difficulties .</p> <p>One is the relative price/value differential between forest land to be cleared (low) and bare land required for offsetting or compensatory planting (high, and higher still if close to settlements). The other will affect those with smaller or geographically restricted estates, in that they may not have land to plant and may not wish to acquire non-contiguous land.</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?
	Most key topics appear to have been covered with one exception - that of public perception and public opinion.
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.