

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:	June Harrop
Your organisation (if any):	MOD -Defence Estates
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?
<p>While the MOD would do not see a problem with up to 3000ha per year of restoration or expansion of open habitat nationally, the MOD will not agree a set figure. For most heathland sites designated the aspiration is already tied up with an existing PSA target set for 2010 and 2015 for MOD as agreed with NE.</p> <p>SSSI projects should not be subjected to the assessment and evaluation framework developed in the paper, or be included in the costing and assessment of this policy, as these works are already required under other existing policies.</p> <p>Management costs for the open habitats will depend on the management regime put in place. MOD is aiming to use long term grazing of heathland open habitat, to ultimately reduce the cost, but the amount of any restoration will depend on available resources.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Outcomes for heathland habitat need to weighed up against the desired outcomes of the heathland habitat itself. i.e. look at site objectives specific to their Habitat Regulations designation requirements. Therefore, the desired outcomes will differ from site to site.</p>	
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?

No	Question.
	No further comment.
<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.	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>Woodlands and Open habitat can be worked together on the same site given the right scale. This is an approach we have taken on the MOD Training Estate in the Home Counties. Mixing open heaths with mixed woodland both for military training requirements and nature conservation.</p> <p>Promotion of mutual benefit will hopefully make the open habitats requirements easier for land owners to accept. For example in some cases we have agreed that some woodlands will only revert back to open habitat at the end of there present productive life cycle i.e. after clear felling.</p>	
<p>A presumption against removal of 'mature native woodland'</p>	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
Agree. No Further Comment	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
Agree. No Further Comment	
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
<p>The MOD uses Integrated Rural Management Plans to plan work on the rural estate. These plans provide a 5 year management plan for each site, and the different elements of each plan are discussed with the relevant local stakeholders. However, as the primary purpose for holding any land is for miliatry training and operations, we retain the right to make the final decision. The appropriate extent and degree of stakeholder engagement is decided on a case-by-case basis.</p>	
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
Priority needs to be at national level and fed down to regional level. Many open habitats	

No	Question.
	such as heathlands are in the south of the country. Areas of woodland could be retained further north to maintain the present level of tree cover nationwide i.e. the right tree in the right place.
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?
	Agree. No further comment
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?
	The possible use of one off grants to evaluate a site against the declared species and habitat designated threshold should be considered. Standardised forms and a simple database may be useful to practitioners to track projects.
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 requirement to plant an equivalent woodland elsewhere, could be onerous on land owners who are clearing woodland for open habitat on request of NE to meet UK commitment to open habitats regulations.</p> <p>Mitigation woodland planting would need to be encouraged by the FC through woodland grant schemes in the appropriate location i.e. on land which is of marginal use to agriculture.</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	The threshold could vary over a period of 10 to 15 years, reducing over time to the stated threshold figures. However, the threshold becomes irrelevant if there is compensatory planting.
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?
	No further comment
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

No	Question.
	outline practices presented? How could we best ensure that such practices are adopted?
	<p>The MOD agrees that management practises to minimise carbon emissions during restoration or expansion of open habitats should be adopted. However, the MOD notes that, due to the operational requirement of our estate, we may not be able to restore and create open habitats or implement all the suggested practices. The MOD has established mechanisms to enable carbon emissions to be reduced in line with SOGE (Sustainable Operations on the Government Estate) targets.</p> <p>However the problem comes with the wider industry taking on a carbon emissions reduction i.e. As an example, a recent large scale forestry operation in Surrey created approx 3000 tonnes of woodchip as a green fuel; this was subsequently transported by lorry to be used in outlets as far away as north Wales and East Anglia.</p>
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?
	The work involved in undertaking these calculations may not be cost effective or practical for small scale woodlands.
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 MOD is fully supportive of the UK BAP and all identified priority habitats and species. The MOD is also involved in the reduction of carbon emissions across the Government estate. We believe that there is a finite balance between the two objectives, which for the MOD estate, is determined through each site's Integrated Rural Management Plan
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?
	Due to the unique nature and requirements of our estate, the MOD would only be able to support a dynamic approach to land management where it fits in with the defence purpose. The MOD supports many SSSIs on the estate and recently agreed a Joint Partnering Agreement with Natural England to approve a SSSI Improvement Programme and achieve the PSA condition target of 95% by 2010. The MOD will continue to support SSSI and wider biodiversity improvements of our estate, where this is compatible with our military needs, through our dynamic Integrated Rural Management Plans.
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?
See response to question 18	

No	Question.
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 net deforestation level is too small to have a significant effect on timber production. Is the potential impact on the rural economy as a whole being considered?	
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?
Some combination of 6.3.1 and 6.3.2.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
Compensatory planting should be encouraged by the FC by informally.	
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?
No further comment.	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Has the implications for public access in the areas of habitat respiration been considered?	
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](#)

Senior Projects Officer | Policy and Programme Group | Forestry Commission England
620 Bristol Business Park | Coldharbour Lane | Bristol | BS16 1EJ

¹ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.

0117 906 6003 | 07779 627668 | oh.consultation@forestry.gov.uk

Fax: 0117 931 2859

By 17.00hrs, Friday 5 June 2009.