

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 Starr, David Robson and Andrew Weatherall
Your organisation (if any):	National School of Forestry, University of Cumbria
Date:	18 th 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?
<p>No. We believe we need a minimal level of intervention, based upon a clear scientific need for the restoration to open habitats, and with clear and demonstrable outcomes in terms of increased biodiversity. Further habitat resilience in the face of climate change needs to be considered.</p> <p>The proposed policy would also seem to be counter to the need for the UK to mitigate carbon emissions in the short-term, how will carbon stocks and fluxes be taken into account due to these changes?</p> <p>The policy also chooses a fairly arbitrary 'baseline' for a desired level of afforestation in the UK. The chosen baseline of the start of the 20th Century is probably close to the all time historic low of forest cover in the UK. The UK has the lowest % of forest cover in Europe. Is this the time to be slowing our reafforestation?</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Yes. 1. The UK England woodland resource and the success in afforestation over the last 80 years needs to be seen within the context of a declining global resource (An inconvenient truth). 2. Self-sufficiency in forest products needs to be seen within the context of resource security and the potential for greater conflict in a world affected by a shifting climate and population growth. 3. The ecosystem services of natural regeneration and possibly of exotic plantations, needs to be better understood and promoted.</p>	

No	Question.
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?
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. However this goes both ways. There appears to be a presumption in favour of open habitat restoration at the expense of overall woodland cover. Expansion of woodland cover on existing open habitats may have considerable benefits too.	
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 for ancient woodland. For MNW it may well be the case that the relatively young woodland has less biodiversity value than an important open habitat. Is 'native' woodland being defined in a very narrow sense? Is this taking into account potential effects of climate change on native species distribution? What thought has been given to the resilience	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
Ambiguous. See 5 above. How would you treat beech in the Lake District for example. Is the 'honorary native' concept accepted? Does Provenance of tree species matter?	
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 in principle. However are we really able to articulate the complex issues that arise when making balanced judgements in cases such as this. For example how might the local cultural views of, say, open space be balanced with the scientific assessment of biodiversity? Do we really know enough at the local level to be able to answer the range of questions likely to be posed by different interest groups?	
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	

No	Question.
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?
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?
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?
No. In all cases compensatory planting should be funded to ensure no net deforestation (see Q21), in addition, we consider that the threshold should be to continue to increase afforestation for biodiversity, environmental (including carbon mitigation), economic and social benefits.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
We believe that the threshold of 'avoiding net deforestation' is not appropriate. The threshold should be about increasing overall afforestation for biodiversity, environmental (including carbon mitigation), economic and social benefits.	
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?
Unless we achieve GHG emission reductions the achievement of biodiversity objectives may be little interest.	
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?
If compensatory planting is carried out along with the low-impact operations suggested then emissions should be negligible.	

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?
Reducing carbon emissions is the priority which is why afforestation and compensatory planting is supported.	
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?
We need far more evidence that dynamic management achieves demonstrable benefits at a reasonable cost to the taxpayer.	
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?
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	
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?
Option 1.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
It should be a condition made when removing woodland and should be based on a regional approach. The compensatory planting may be done by the FC, by a private owner or public body/charity. If the nation can afford the active management of more	

No	Question.
	open space then it can also afford to maintain and even increase woodland cover. The planting should result, over time, in a woodland at least as biodiverse as the one removed.
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?
	Q; Do we know enough about the combined effects of climate change, biodiversity and habitat management to be able to make the value judgments implied by this consultation exercise?
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.	
It is difficult to consider 'open habitats' in isolation from other land use change, we see a need for similar judgments on the value to the nation of a range of land uses in terms of both their biodiversity and production functions.	

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.