

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:	Stephen Trotter
Your organisation (if any):	New Forest National Park Authority
Date:	3 June 2009

No	Question.
The nature of the change	
1.	<p>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> <p>No, the range of figures shown would appear to be overly modest and wont make a big enough or rapid enough impact on reversing the damage that has been caused by inappropriate planting in the past. The important habitats that have been damaged by plantations in particular - and in some cases these are critical habitats for carbon sequestration (i.e. blanket and lowland bog) should be prioritised for complete removal within the period of the plan as an urgent priority especially where the prospects of rapid recovery are good. Rough calculations from the evidence provided, which we assume is accurate, would indicate that trees should be removed from the following areas to produce significant benefits within the 15 year period:</p> <p>lowland heath (60,000 ha); blanket bog (c 5000 ha); lowland bog (500 ha) and upland heath (20,000) = a total of 90,000 ha should be the aspiration within 15 years (i.e. a rate of 6000 ha per year).</p> <p>This is justified by the damage that commercial forestry has caused to important habitats. These are habitats that are critical to climate change adaptation both for wildlife itself and in terms of ecosystem services for human populations (and which are generally as or more 'valuable' on open sites rather than plantations).</p> <p>The assumptions made in the proposal about likely costs would seem to assume the worst case scenario in terms of assuming high costs but low income from conversions. They appear to not include / under-estimate any potential income from timber sales (some markets are still relatively buoyant despite the current downturn e.g. wood fuel - and are likely to remain so in future). Similarly, potential income from post-felling land management of open habitats seems to be underestimated. If sites are returned to low input - low output agricultural function or other similar land uses they should easily be able to cover the costs of management. If FC is unable to manage open land without incurring the costs listed (e.g. by reducing the associated additional overheads / administrative costs) then privatisation or transfer to NGOs should be considered (?). If</p>

No	Question.
	<p>there are legitimate additional costs, these could be mitigated by linking tree removal projects to the provision of green jobs and developing / pump-priming the wood fuel supply chain and the associated skills required to make it a sustainable industry. Why not include the plantations on open habitat sites as potential wood fuel sites along with the under managed private woodlands mentioned in section 6.2.3 as a one off non-renewable resource whilst new sources are established?</p> <p>Restoration of open habitats from plantations should be seen as an urgent priority analogous to the priority given by government to the PSA target to restore favourable condition to SSSIs - and a similarly challenging but significant target should be set for government action to reverse the damage that has been caused.</p>
<p>Desired outcomes</p>	
2.	<p>Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?</p>
	<p>The list of likely impacts in Table 4. seems reasonably comprehensive and is welcome but it would be helpful to consider expanding woodland establishment, expansion and creation in new appropriate sites to balance conifer removal from important former open habitats. This could be achieved by developing and allocating resources to greater incentives for planting on non-damaging sites to ensure no net loss of woodland cover. We would strongly support a continuing and significant increase in woodland cover (especially of sustainable 'native' woodland) across England and Wales - but just not on these or other important open sites.</p> <p>We would question the basis on which the relative costs of managing trees against open habitats has been calculated (have the figures quoted been calculated on an equitable basis?) and this area of the proposals / evidence base would seem to deserve further review. The figures quoted seem to be very high for the management of open habitats especially as mostly the proposals are for low input - low output management systems. Other land uses may often bring in higher revenues that could more than cover the costs (e.g. sporting, recreation, energy).</p> <p>We would also question the basis on which the comparison of net carbon balance has been calculated - particularly for peat based soils where there is likely to be an improvement in soil carbon sequestration and storage following removal of trees through wetter soils and increased accumulation of organic material in soil horizons. The negative impact of tree removal on the carbon balance seems questionable and requires further research. The calculations also depend on the assumed end use of the trees on these sites - it can be assumed that the poor quality of much of the timber on these sites is destined for short term end use such as pulp / wood fuel and hence the long term carbon storage potential is minimal as opposed to say furniture or building (?). Then, even if the end use is for furniture or construction - this is likely to only capture the C for say 30 - 100 years. The potential of peat and organic soils to provide genuine long term capture and storage of carbon would appear to be greater.</p> <p>In terms of landscape - plantation removal has the potential to offer huge benefits for the restoration of important designated landscapes that have been damaged by forestry plantations across the UK, including those in the New Forest National Park. This benefit is not fully recognised in the document. This policy could provide the opportunity for the UK government to realise its responsibilities under the European Landscape Convention in respect of restoring significant and important landscapes that have been damaged by inappropriate forestry. For example, studies have shown how the special qualities of the New Forest National Park landscape could be restored and improved to meet the locally identified landscape characteristics and character areas through the continued removal of inappropriate trees at a landscape scale (see summary of reports by the New Forest</p>

No	Question.
	<p>Association 2007 and Hampshire and Isle of Wight Wildlife Trust - attached). This would also be the case in many upland situations where plantations have not been established in appropriate ways that respect the character of the landscapes for which areas have been designated. Positive tree removal programmes can make a significant difference and improvement to the landscape of National Parks. As demonstrated by FC and partnership projects already underway, for example, in the New Forest, Alportdale in the Peak District and Ennerdale in the Lakes. This is another reason to be more ambitious in the programme of clearance - as discussed in comments to Q1.</p> <p>The impact on the timber industry need not be negative if appropriate expansion of trees on appropriate sites is given enough emphasis alongside the clearance programmes.</p> <p>The list of outcomes is good but should also include improved landscape quality outcomes (including maintaining and enhancing local distinctiveness) as a result of the programme - especially in protected landscapes and in pursuing an integrated holistic approach to landscape restoration at the landscape scale.</p>
<p>Measuring the success of the policy</p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
<p>Yes but it also needs landscape quality indicators for the sites and those surrounding areas affected by them</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>Yes, we agree that woodland and open habitats are mutually beneficial and should be seen as integrated components of the landscape mosaic - the New Forest landscape is a classic example of this in practice.</p> <p>Yes we would agree this concept should be promoted. The importance of transitional habitats and shifting mosaics should also be recognised.</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>We agree that no ancient woodland sites should be removed and, in general, that there should be a presumption against removal of mature native sites over 80 years of age. However, having a blanket policy of retaining all 'mature native' woodland might be too prescriptive and there could be situations where removal of such woodlands might be acceptable and beneficial without loss of biodiversity or other elements to deliver the policy outcomes. Perhaps FC need to be clearer about the criteria for exceptions to this approach? There needs to be some flexible element in the decision-making process for evaluating whether the new open habitat that could be created is likely to be of greater</p>	

No	Question.
	value than the existing mature native woodland.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	Generally agree although we would prefer regional flexibility in the interpretation of what constitutes 'mature native' woodland. On some sites 80 years may be too young an age.
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 this is vital - local communities need to understand and ideally have an interest and stake in the outcomes of tree removal and open habitat management. Local knowledge can often provide a high level of insight, and we would expect an appropriate level of consultation to be carried out before major projects are taken forward. In the New Forest we would anticipate major opposition to some deforestation proposals if they are not well explained and consulted upon and so a combination of options 1, 2 and 4 may be appropriate. This needs to be applied flexibly depending on circumstances. There has been some excellent work done by FC in the New Forest and there would seem to be opportunities for other areas to learn from this best practice.
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 level is generally ok but where there is a strong local identity e.g. a protected landscape / national park / area of outstanding natural beauty it should be planned at the appropriate scale to the landscape concerned e.g. sometimes at the forest district level (- and / or it could also be based on the NE landscape character areas?). It is important that priorities are consistent with the context of national park statutory purposes and national park management plans, are derived from partnership working with national park authorities and support the special qualities of these areas.
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, use of the framework seems appropriate but the information required for the evaluation needs to reflect the scale or complexity of the proposals. We can foresee some very simple restoration proposals which will require very little justification in terms of public benefits, particularly where bog / heathland restoration and landscape enhancement is the primary driver.
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?
We have no strong views on this but the New Forest National Park Authority may be able to assist applicants with their evaluation in relation to National Park objectives. Future	

No	Question.
	modifications to grant schemes need to have a health check to ensure that they reflect and are consistent with this policy.
<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.	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>No, there should be no threshold rate of woodland removal as this is likely to prevent some proposals from being implemented - and potential restoration projects should be judged on their merits. A requirement to provide compensatory planting might in some situations prevent certain landowners from delivering projects which provide significant public benefit.</p> <p>The emphasis should be on government providing better incentives for accelerating new woodland creation in appropriate sites to balance the potential removal of trees from inappropriate sites. This should be a strategic responsibility for the public sector to monitor and implement at a regional level.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
see above	
<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?
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, but not to the detriment of the restoration objectives. It might frequently be important to restore a site before the full economic maturity of the trees has been reached, for example. We would agree with minimising soil disturbance and not removing stumps where this does not interfere with restoration objectives. However, often the removal of brash may contribute significantly to the restoration of the target open ground vegetation depending on the particular situation. More emphasis might be placed on how the restoration of habitats is carried out on peat soils to minimise emissions and restore active carbon sequestration processes where the peat may be a better carbon storage mechanism than the trees. The use of grazing stock and being patient by allowing natural processes to function over longer time periods may also be a better approach instead of using mechanised approaches to achieve quick results.</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 - but this needs to be done holistically and include the full life cycle of a plantation including the end use of the timber harvested, as mentioned above much of the carbon stored may only be short term (even use in furniture and building may be short term compared with natural habitats). Many open habitats may initially appear to have lower storage rates but are capable of potentially capturing C more securely in the very long term.
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 urgent priority should be on creating resilient habitat networks and achieving the biodiversity objectives (i.e. improving the ability of species and landscapes to adapt to climate change) rather than on reducing emissions (i.e. mitigation) because at the local level it makes very little difference to global climate change. The climate change impacts that are in the pipeline and going to happen anyway are likely to be profound, therefore the priority should be to enable species and natural habitats to respond and adapt locally. This is best achieved by creating landscapes that are permeable and welcoming to a broad range of species. Restoring open habitats is one of the keys to achieving this objective as part of a landscape mosaic (that also includes a connected network of woodland and trees).
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?
	<p>We support a more dynamic approach to land management if that means enabling natural processes to function within the context of landscape-scale 'naturalistic' (as far as possible) grazing by large herbivores. The New Forest commoning system provides an excellent example of how this can work in practice - with excellent outcomes for open habitats, woodland, landscape and biodiversity. This enables many of the 'natural' processes that should be present to produce more 'natural' outcomes that are not necessarily predetermined by managers (although potentially within certain limits of accepted change if necessary). Favourable condition as the concept stands is not necessarily helpful in that it measures the artefacts of management processes (i.e. the species present and their relative abundance) rather than whether the management of an ecosystem is promoting a range of functioning processes at a landscape scale. We should be less concerned with what species mix emerges so long as complete as possible a range of appropriate 'natural' processes are able to operate. Many of these are driven by the presence of a range of large grazing herbivores and keystone species.</p> <p>The New Forest experience suggests that developing biodiverse, dynamic and changing habitat networks can be effective in increasing resilience as well as biodiversity at the landscape scale. However this needs appropriate management regimes to be in place which may be challenging in many parts of the country and will involve building partnerships with local communities and this may be one way in which costs are reduced.</p>

No	Question.
18.	<p>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?</p>
	<p>Yes - it needs a new approach to habitat management and conservation and new thinking / leadership from Natural England and to learn from the experience of places where it already works (like the New Forest). In other words through building partnerships with farmers, landowners and potentially developing new systems of management with local people akin to commoning systems. We would like to see real progress towards developing more resilient habitat networks and living landscapes to reverse fragmentation in the wider countryside and urban environments. We would be happy to see flexibility in the development of networks based on the principles outlined in Q17. Some important sites, habitats or species within the networks might require a more tailored approach.</p> <p>Yes there is scope for modifying SSSI objectives but the problem on the whole is that many are too small for the more dynamic approach to work (at least in the lowlands - and there may be landownership issues in the uplands) but that is no reason why opportunities should not be fully explored by the appropriate agencies.</p> <p>No, the end point for restoration projects should not be judged against favourable condition criteria for SSSIs.</p>
<p>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</p>	
19.	<p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>
	<p>No we have no further info at this stage (a New Forest specific study on this issue is planned later this year) and the issue requires further evidence and information on which to inform judgements. The economics and sustainability of current plantations on these sites is already highly questionable when the full costs of production and state subsidy across the life time of a plantation are factored in to the calculations. A holistic approach that factors in all of these costs is required.</p> <p>However, if the strategy also promotes an expansion of timber production in appropriate locations, the removal of trees from open habitats should have less economic impact. Also, as many of the habitats of concern are supporting trees of poor timber quality or have additional costs due to access problems, it may actually benefit the industry in time to relocate the crop. On the right sites, there could be a case for retaining intensive forestry on relatively short rotations that might be beneficial in terms of supplying the timber sector.</p>
<p>Different approaches to applying policy</p>	
20.	<p>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>
	<p>Option 2 would be the preferred approach, where the existing and potential biodiversity of a woodland can be realised or maintained. In many cases this may be achieved through the management and maintenance of existing woodlands and would not always result in complete woodland removal. A partnership approach with adjacent and local land managers may help to reduce costs and identify innovative management solutions to post removal management and maintenance. Costs may not be as high as anticipated if</p>

No	Question.
	<p>a landscape scale approach is adopted and local communities share an interest in the solutions (as discussed under previous Qs). Particularly against a background of the increasing need to source food locally due to fuel costs, improve food security and food shortages caused by climate change impacts on global food production, the cost / income mixture may become much more favourable within the 15 year time period of this strategy.</p>
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
	<p>Encouraging compensatory planting is a positive and welcome approach but this will not necessarily be possible for all situations and may prevent some tree removal schemes coming forward (see Q11). Some flexibility is required and a compulsory approach is not likely to be successful in achieving the objectives. It would be helpful to have some guidelines for this such as ... how far away from the clearance site can this be? what type of woodland? timing issues? We would assume that compensatory planting should be within the same landscape character area, as close as possible to the original site - but there should be enough flexibility to help create and deliver landscape scale woodland and re-forestation plans.</p>
<p>Factors to consider when deciding which policy is likely to work best</p>	
22.	<p>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?</p>
	<p>Yes, although restoration to open habitats for landscape purposes, as well as biodiversity reasons, should be recognised as being an important outcome, particularly in national parks and protected landscapes. Also, the historic landscape and archeological aspects of a site need to be fully and adequately assessed to ensure any features are recognised and protected in the course of any tree removal programmes.</p>
<p>Implications for delivery mechanisms</p>	
23.	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>
	<p>National Parks, Natural England and other Defra organisations are well placed to support the delivery of the policy and we would welcome closer involvement and a joined up approach. Advice and support from the public sector (such as National Park Authorities who already have existing mechanisms to provide land management advice in other areas) could assist private landowners in developing high quality proposals which will help achieve a strong balance of public benefits.</p>
<p>Other comments</p> <p>We welcome your input on any other aspect of this consultation.</p>	
<p>We welcome the development of this policy and congratulate FC on the work that has been achieved so far. Thank you for giving us the opportunity to participate in the development of policy and if there are any further ways we can be of assistance, please do get in touch.</p>	

No	Question.
	<p>The overall principle of restoring open habitats from plantations is welcomed and there is an exciting opportunity to integrate proposals with the development of habitat networks in national parks and the wider countryside. This might include woodland removal/open habitat restoration in some places but promoting the establishment of new woodland and the creation of transitional habitats or open woodland within existing woods could be just as important. A range of approaches could help create more effective habitat networks which will eventually be more biodiverse and more resilient to climate change than the habitats they replace. They may also have an economic role. One of the key priorities should therefore prefer be the development of resilient habitat networks.</p> <p>The New Forest National Park recognises the complexity of considerations that must be taken into account in developing a policy on open habitat restoration - that will ensure more benefits than disadvantages across a number of key priority areas - especially for biodiversity and species resilience to climate change. We agree with the factors to be taken into account that have been identified in the Forestry Commission's evidence paper and summarised in Table 4, and are pleased to note that landscape impacts are included although more emphasis could be given to landscape outcomes elsewhere. These will be particularly important in a National Park context.</p>

Please include the "information about you" form with your response.¹

Please send your completed forms to:

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By 17.00hrs, Friday 5 June 2009.

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