

Response to FC consultation on open habitats

Comments on behalf of the Norfolk Biodiversity Partnership

Question 1

Does your aspiration for the scale of the policy fit within our calculated range of 5600 to 30000 ha of restoration or expansion of open habitats from woodland or forest over 10 – 15 years. This is 370 to 3000 ha each year. What level of intervention would you prefer and how is this justified?

We welcome this consultation from the Forestry Commission and FC's aspiration to manage the forestry estate to enhance biodiversity. However, we believe that it should be possible both to increase the area of forests and woodland in England whilst simultaneously increasing the area of open habitats. Apart for Ireland, England is the least wooded country in Europe, and targets should be set to increase the amount of woodland from the current 8% of land area.

We agree there is a need to restore and manage BAP habitats within forestry plantations through a variety of mechanisms and to increase the diversity of habitats present within such plantations, when there is survey evidence to suggest this is appropriate. A variety of mechanisms may be relevant here, including the creation of habitat mosaics, management of rides and glades, development of a more varied forest structure and an increase of open area, either temporary or permanent, where appropriate. We also recognise the need to look beyond the forest and to consider its place and role in the wider ecological network.

However, there are considerable costs associated with the removal of trees to create open habitat. There is the initial capital cost, then the loss of revenue. In addition, there is the opportunity cost – such as the loss of recreation potential, the loss of timber revenue and the loss of employment within the forestry sector.

There are Habitat Action Plans for woodland which could conflict with the policy as set out here and the policy should account for the need to balance all HAP targets as far as is possible.

In addition, forests and woodlands are dynamic ecosystems which have open space in them as a natural part of their management system, e.g. rides, glades, part of the rotation system or open space in wet woodland or wood pasture. These already provide considerable 'open habitat benefits' but do not seem to be taken into account.

The biodiversity benefits of creating or restoring open habitats in forestry need to have a scientific foundation. In addition, the biodiversity benefits that can accrue from the creation of open habitat will depend very much on site specific circumstances and future management treatments, which are not

clearly specified in the proposals. The benefits could be achieved in a variety of ways, all of which should be explored here.

The Partnership is also concerned that the policy is being presented as a “forestry versus open habitat” policy. It should be a policy that looks at all land use, and not target the perceived soft target of forestry when the country already imports the majority of its timber needs.

There is also a concern that there will be a disproportionate effect on the region because the majority of the open habitat target will be heathland, and there is a large amount of forestry on light land in the East of England. However, there are a number of plantations on former heathland areas that have been identified as high priority sites for heathland restoration in county and regional heathland strategies; we would like to see a move towards encouraging more open habitats within these forests. This underlines the need to develop local approaches and targets, through close consultation with stakeholders.

There is also a false assumption that there is some sort of threshold under which it is possible to remove land from forestry for open habitat and have no effect on the wider objectives of timber production, revenue, supply of saw logs, access and recreation etc. Any loss of land from forestry will impact on other objectives. The sort of integrated approach that this policy is seeking has already been achieved to a large degree in the exemplary management of Thetford forest.

Question 2

**Have we developed a reasonable list of desired outcomes of the policy?
Do you wish to suggest any amendments?**

The policy should be looking at all land use – not just forestry. It should be concerned with the heterogeneity of all habitats. Adequate attention should be given in the policy to the need to develop mosaics of habitat and to the need to carry out biological surveys/monitoring.

Any change of forestry to heathland will result in access to grazed land (CROW Act). A key desired outcome that is currently missing is that the needs of both grazing and access should be balanced and well managed.

The list should also include the need to look at forests and woodlands within the context of ecological networks, which would include the needs for buffering and linking habitats. It would be useful, for example, to have an outcome related to habitat connectivity.

The need to address local priorities should be set out, as should the need for research into management techniques that allow for more open habitat and varied structure within plantations.

Question 3

Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendment to this indicator list?

The policy makes an assumption that increasing the amount of open habitat at the expense of forestry will automatically deliver biodiversity benefits. However, we believe there is a need for a greater amount of survey, monitoring and research to assess the biodiversity benefits of such an approach and to document the biodiversity outcomes related to different management techniques. For example, there is a need for research comparing the biodiversity of existing open heathland with young plantation forestry on the same land, and on the effects on biodiversity of recent heathland restoration exercises. Open land followed by young plantation is, after all, a normal stage in plantation forestry.

The financial viability should also look at issues such as: the cost of supplying saw logs to local mills; the location of the supply source; the sustainability of the supply; and effects on confidence within the milling industry. It should also look at costs involved in any changes to the potential of woodland for recreation.

Question 4

Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea useful in gaining support for open habitat restoration and expansion from woodland?

Yes. Woodlands and open habitats offer complementary opportunities for biodiversity, although much depends on habitat structure, soil type and management approaches, as well as context and scale. We believe that there is considerable scope to make much greater use of habitat mosaics and the concepts of ecological networks when planning the management of forests and woodlands.

Current forestry practices already lead to considerable habitat heterogeneity. When measuring habitat complexity and integration, it is critical to be able to measure both the horizontal and vertical complexity of the habitat; it is not about two dimensional landscape planning. It is important to recognise that forestry is a dynamic system which has open habitat as part of its natural cycle.

Question 5

Do you agree with the principle that there should be a presumption against removal of ancient and mature native woodland?

We agree that there should be a presumption against the removal of ancient woodland.

The concept of “mature native woodland” is more difficult, as this is not a meaningful or helpful statement in biological terms; it could, for example, include single species stands of secondary woodland with relict habitats

beneath. In some native woodland, it might be appropriate to open up areas within them to increase diversity and restore remnant habitat; there should not be a presumption against this.

There should also be reference in the policy to the need to create new woodland in suitable locations as part of ecological networks and to buffer, link and enhance existing woodlands.

We would add that the definition of mature woodland needs to be carefully considered in relation to wet woodland.

Question 6

What do you think of our proposed outline definition of ‘mature native woodland’?

We do not find this definition helpful or meaningful in biological or habitat terms. It could, for example, encompass secondary woodland or neglected wood pasture, so it is not possible to comment on its policy and management implications; each site will need individual attention and consideration. Definitions of habitats already exist in the National Vegetation Classification and as Phase 1 survey codes; these should be used to describe habitats scientifically and to avoid confusion.

Wet woodland matures at a young age and should be treated as a special case. We are concerned that the whole subject of wet woodland – a habitat of particular importance in the East of England – appears to have been put to one side in the consultation.

Question 7

**Do you agree that local participation in decision making is helpful?
What is your preferred option for how we apply this element?**

Local participation should be in reference to local BAP partnerships, local priorities and local ecological networks.

Local participation is important, but will come lower down the consultation process – in other words on a site-by-site basis. There is a cost in doing this which needs to be recognised, although the FC Environment Impact Assessment and Design Plan consultations work well. There is a significant difference between “engage” and “consult”. Interest groups should be engaged at the earliest stage possible. Consultation comes later.

Question 8

Do you agree that prioritisation at a regional level is appropriate for this policy?

Yes. The Regional Spatial Strategy for the East of England has a presumption against the removal of trees, so regional prioritising will be important.

Question 9

Do you agree with the framework for evaluation? What is your preferred option for how we should apply this element?

It is crucial that the impact of management actions be measured, and we believe that the policy should call for additional research and rigorous monitoring. The current framework for evaluation as set out in the consultation document appears to be very linear, with no built-in feedback. It also does not appear to include mechanisms for looking at opportunities that may have been lost by undertaking one management approach instead of another. In sum, we do not agree with this framework for evaluation, as it appears to be short-sighted and target driven.

Question 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?

There must be proper monitoring or the potential benefits of work carried out cannot be documented. However, good monitoring costs money. The research and methodology exists to track changes in biodiversity – it needs to be properly replicated and systematic. FC should support monitoring and evaluation by practitioners by providing funding and where necessary, technical support. As mentioned in our answer to Question 13, we believe that projects such as the Brecks Biodiversity Audit are the types of initiative that deserve an enhanced level of support.

We also need to ask whether we know what success looks like. The assessment of condition is measured against current perceptions – these could change in the future. The landscape is constantly changing and targets should not be set that have been based on some arbitrary date in the past, such as the First Edition Ordnance Survey. There are many external factors that affect policies and hence how these are evaluated, eg, fashion, climate change and disease.

Question 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. A key question for the Biodiversity Partnership is the scale at which a threshold would be applied. For example, Norfolk is already experiencing net deforestation and we do not believe that it would be acceptable to stakeholders if this rate were to increase. We believe that setting a threshold at the England level is too crude and that thresholds – and we would advocate woodland expansion levels – should be agreed at the regional level and applied on the “upper tier” authority level.

We also believe that there needs to be due reference to the need to balance the creation and restoration of different BAP habitats, rather than seeing these as in conflict with each other. Due attention should also be given to the

concept of ecological networks and to the need to buffer and link habitats and to expand existing woodland sites, where this is ecologically appropriate.

Question 12

Do you agree that the proposed threshold is about right, too high or high low?

Any threshold should enable woodland expansion to continue, with safeguards in place to ensure that there is the correct amount and type of open habitat across all land uses at the Upper Tier authority level.

Question 13

Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration on expansion of open habitats?

Yes. Existing research needs to be adequately collated, and a proper mechanism for research and monitoring put in place.

Appropriate management of open space and early successional structures within plantation systems and forested landscapes can benefit much of the heathland biota, but issues of scale, arrangement and management of this open habitat component remain poorly understood. Requirements for large-scale patches of open habitat (what we would term “heathland habitat” as opposed to open habitat structures within the forest) may be important for relatively few heathland species, but this has yet to be reviewed comprehensively.

We believe that the “Brecks Biodiversity Audit” offers a potential model of best practice. This project is currently being carried out by the University of East Anglia with support from the Norfolk and Suffolk Biodiversity Partnerships, FC, Plantlife and Natural England, and seeks to collate existing biodiversity data for the Brecks and relate this to specific management practices. The BTO’s research on the relationships between birds, forests and open habitats is another excellent example of the types of research that are required to inform management. We would urge that the importance of initiatives of this kind be explicitly recognised in the policy and given much greater funding support.

Question 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 online practices presented? How could we best ensure that such practices are adopted?

Practitioners should be encouraged to adopt low emission practices where possible, and perhaps a set of voluntary guidelines or a code of best practice could be developed.

As soon as trees are removed to create open habitat, there is likely to be a net reduction in carbon storage and sequestration. Practices such as leaving

stumps may help ameliorate this effect, but are not always compatible with future management, eg, grazing. There is a need for flexibility and the use of a range of techniques, including wind rows and stump retention where feasible and appropriate.

Question 15

Do you agree that it is appropriate to include impact on long-term average carbon store and loss of potential to substitute timber for higher carbon materials in the calculations on carbon balance?

We are a little puzzled by the figures used here. Wood burned with coal is only 30% efficient whereas wood burned alone is up to 90% efficient. The former figure seems to be being used. Would this then increase the forecast carbon savings by a factor of three?

Question 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?

Conversion to open habitat should be based on evidence demonstrating sound biodiversity gains. The need to expand native woodland and sustainable timber production/wood fuel production should be part of the equation here.

A need for FC to plant new woodlands as compensation when creating open habitat would help to mitigate the need to make such a judgement. Compensatory planting should be employed where appropriate and should pay due reference to ecological networks, including the need to link and buffer habitats.

Question 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. SSSIs are currently assessed using rigid and static criteria. A more dynamic and flexible approach to land management outside SSSIs would be welcomed.

Question 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 end point for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?

Non-SSSI sites should not be judged by SSSI standards. Objectives for each area should be defined by the site, the species and habitats currently (or

formerly) found there (or nearby), BAP targets and the concept of ecological networks.

A policy of flexibility to be delivered regionally is essential. Global targets are met by the management of local sites. The end goal is improved biodiversity which must be sustainable. Conservation objectives should be dynamic to cope with wider environmental change. Management objectives can be adapted over time.

Question 19

Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?

The demand for timber is increasing. Local sawmills have invested heavily and reduced supply of sawlogs could be serious. Of equal note is the signal any loss of woodland would send to the timber industry. Investment in modern technology – with the attendant jobs this brings – is expensive and confidence in supply is critical. The uptake of woodfuel is also increasing in the region and demand is predicted to exceed total regional timber production by a factor of two.

Question 20

Which of three approaches by which we make decision 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?

Any policy must be sustainable. The cost of managing open habitats is given as Net Present Value, but the cost needs to be discounted in order to give a true reflection of the costs over time. The need is to ensure an appropriate scale and pace of change at a regional level.

That being said, Option 1 gives a disproportionate emphasis to a consideration of cost; as we have witnessed over the last few months, economic conditions and markets can change rapidly and unpredictably. Option 3 is predicated on the assumption that the rate of woodland creation will not increase to keep pace with open habitat creation; we believe that FC should be pursuing a policy of woodland expansion in parallel with open habitat creation. Option 2 is thus our preferred approach.

Question 21

What is the appropriate role of compensatory planting in this policy?

Compensatory planting should be linked to targets for woodland expansion, for example, around growth points. However, we would not support the idea of imposing additional costs on non-statutory bodies (eg, Wildlife Trusts), as this could make many NGO open habitat projects unviable. Rather, we would argue that FC – on behalf of Government – should plant additional woodland to compensate for open habitat creation.

There is a supposition in the consultation document that there should be like-for-like planting – but this needs to be looked at on a site-by-site basis. The current Regional Spatial Strategy policy on woodland includes a presumption against woodland removal, but – if appropriate – seeks compensatory planting of a least equal area and composition, ideally in the same landscape unit; certainly within the region.

There should be clear guidelines on river valley poplar plantations and the restoration of wet grassland, reedbed and fen habitats.

We would also like to see greater emphasis accorded to the potential for natural regeneration on some sites, eg, by encouraging existing woodlands to expand onto adjacent land.

Question 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?

We should like to see the following questions asked:

- What increase in woodland cover should be aimed for (England is currently 8.4%)?
- What opportunity costs are there in removing woodland, i.e. what management objectives might be compromised?
- Is there a sufficient scientific basis for suggesting that removing woodland to create open habitat increases biodiversity?
- Should a policy about open habitats look at all land use – not just forestry?
- Should the need to ensure the supply of timber and wood to already expanding markets be accorded greater importance?
- Will an increased amount of heathland (which will be subject to open access under the CROW Act) cause potential conflict with the need to increase grazing? If so, will it deliver the desired habitat structures?
- How do we bring together the interests of forestry/timber production with BAP targets and ecological networks? What part can commercial forests play in delivering these, where are the conflicts and how can these be resolved?

Question 23

Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome by you?

The potential loss of woodland could have serious implications for a wide range of other – accepted – government priorities. These include: carbon policies; timber supply; woodland biodiversity; woodland expansion; access to the countryside; and health and well-being. All of these would be unwelcome.

There is very little mention of ecological networks in the consultation document. This should be revised, as both BAPs and ecological networks inform so much biodiversity work that we need to try to bring these together.

A range of woodlands are themselves BAP habitats and thus their management needs to account for woodland biodiversity, including the need to expand, buffer and link woodland sites within and ecological network. Removing woodlands to create new open habitat may be unsustainable and undesirable and all management decisions should be well informed by site survey and research.