

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:	Mr R Land
Your organisation (if any):	Norfolk Wildlife Trust
Date:	1/6/09

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>The use of the terms restoration and expansion is confusing. Table 2 refers to both whereas table 3 refers to neither. The costs referred to in this section refer to both but quite clearly they will vary widely so it is difficult to see where a meaningful average figure can be derived from. Where do the figures for management of open habitat come from. (If they have been presented in earlier documents there appears to be no reference). There are no comparative figures for woodland management eg cost of coppicing. A net cost is presented but there is no means by which the figure can be assessed. This is important because the argument is being put forward that open habitat restoration/expansion is more expensive but this is highly site specific. We are therefore unhappy with the presentation of the figures in this format.</p> <p>We are confused about the reference to percentage retention of woodland in projects. The argument appears to be made that the area of retained woodland is counted as part of the open habitat target. This would appear inappropriate if this is the case.</p> <p>As regards the aspiration we would wish to see a figure that meets the BAP habitat targets and the lower end referring to SSSI condition as completely inadequate.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>A desired outcome which could come under the 'ecological communities' outcome should be to develop robust areas of open habitat that contribute toward achieving connectivity and larger sites. This would be a more specific outcome which the indicators in table 5 would help measure.</p>	

No	Question.
	<p>Financial viability is a difficult outcome to define. How are 'frequent' and 'manageable limits' to be defined. Is it the place for this policy to determine what the acceptable cost of management of open habitat should be? We would prefer not to see reference to financial viability because of the difficulty in identifying costs which would be up to a third party (which could include FC) to determine if they wished to take on the risk of a project. More importantly however we are unconvinced that it is possible or desirable to identify open habitats for this level of scrutiny but presumably not other BAP habitats eg how much cereal field margin should be paid for by the state? FC may wish to develop their own internal financial tests but these would not be appropriate for this policy.</p> <p>We are unsure as to why woodland biodiversity is specifically identified. The footnote refers to the section 41 list so we would wish to see the desired outcome referring to all BAP habitats and species and not just woodland.</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>This section obviously needs more work. Many of the indicators simply measure 'process' and cannot be used to identify if a desired outcome is being met eg how can collecting information on EIAs that identify local concerns be used to unambiguously measure positive engagement?</p> <p>Why are open habitat projects being measured to see if they are adopting low emission techniques? What are these techniques? A laudable aim that should be applied to all sectors and activities.</p> <p>The woodland biodiversity indicator (notwithstanding comments in question 2) refers to 'established native woodland' but we are unsure of what this is as opposed to 'mature native woodland' as defined on p23 of the report.</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>We generally support the view that woodland and open habitats can occur in mosaics and transitions in space and time. However as stated there are occasions when large scale (how is this defined?) woodland removal is appropriate. Although often beneficial the retention of areas of woodland around open habitats may increase management costs due to continual seed rain. Woodland retention could affect adversely water movement on sites especially where there are mire communities. The promotion of this principle without highlighting the disbenefits may lead to 'inappropriate' retention of woodland in order to 'get past' FC approval!</p> <p>If FC are to look for evidence of practitioners taking account of woodland retention then the reasons for this need to be robust. The list in section 6.1.1 appears to be a rather random selection and most are open to an opposing interpretation - eg the retention of a conifer plantation may not be a desirable landscape feature; surely it is up to the practitioner organisation to determine the balance between woodland and the ecological benefits to particular species; the relevance of the references to forestry economic</p>

No	Question.
	<p>activity and skills are at best debatable and probably irrelevant.</p> <p>Because we believe that the arguments are not clear cut for retention of woodland FC should provide a more balanced assessment of the pros and cons or simply point out that wholesale woodland clearance is not always required in order to achieve site objectives and that these should be clearly defined within any proposal.</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 do not agree with this principle as set out. The first definition is too rigid. Is the definition saying that potentially a non native plantation is preferable to a native open habitat community? If so then we do not support this definition.</p> <p>The second definition is also too rigid. There needs to be a quality threshold. What if the ancient woodland site comprises an 80 year old plantation planted on a heathland that had existed for hundreds of years. What is the definition of 'wooded' in this definition?</p>
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
	<p>The definition is too rigid, lacks a quality threshold and takes no account of potential/desirability for open habitat creation eg to link two open habitat sites</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>Local practitioners by their nature will be aware of local sensibilities and would wish to liaise with local people in order to avoid unnecessary problems. We would prefer to see FC provide guidance on best practice but we are not supportive of FC directing a level of public engagement that may not be required.</p> <p>We believe it would be heavy handed for FC to insist on high quality engagement, however this is defined. Surely it will be down to the funding bodies to insist on this. FCs role is to approve the removal of trees. FC may wish to carry out high quality engagement if it wishes.</p>
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>
	<p>We take issue with the comment that the removal of woodland and creation of open habitats could have a significant negative impact on access and recreation. No evidence is presented for this statement. Our evidence is that on acquiring forested land with no public access we have restored heathland and allowed new access. When clearing dense woodland from existing heath we have expanded the area of land accessible to people.</p>

No	Question.
	<p>Regional prioritisation is probably the appropriate mechanism but as stated this needs to be within the context of a national policy. However the section is short on detail as to what this regional prioritisation will seek to do and what the potential consequences are for open habitat creation.</p> <p>Whilst regional prioritisation fits in with organisational boundaries there is a need to work up rpopoals at a local level. Only then will the real issues, scale and potential for open habitat creation be developed and priorities fed up to regional level.</p>
<p>We will apply a framework for evaluation to projects</p>	
9.	<p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>
	<p>We do not support any form of compulssion in evaluating the effectiveness of habitat restoration/creation. Surely this is for the funding bodies to insist on eg Natural England. We are assuming FC will not be funding third parties for open habitat creation on a significant scale.</p> <p>FC could encourage practitioners to carry out monitoring and highlight best practice. To insist would raise significant issues that are not addressed about who the data is sent to, over what timescale and whether or not a legal binding agreement would be required.</p> <p>The framework set out is too simplistic to identify what is required and for organsaitions to decide on how to commit resources to deliver it.</p>
10.	<p>How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?</p>
<p>see above</p>	
<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.	<p>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>
<p>No comment</p>	
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
<p>No comment</p>	
<p>Key variables</p> <p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
13.	<p>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>

No	Question.
	<p>This is a question for the England biodiversity process and we are not sure why this debate is being opened up in this policy. The BAP targets have been set and this policy should be focussed on how they can be achieved. It is not appropriate to discuss this issue. We would suggest a separate consultation coming from the BAP national partnership.</p>
14.	<p>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>
	<p>This is a complex subject with much scope for generalisations that in effect make no difference to emissions or make the problem worse eg not removing stumps increases future management costs. More research is undoubtedly required. More case studies and dissemination of information and best practice would be desirable.</p> <p>It is a separate issue as to whether practitioners should be required to adopt low emission practices especially if they require more funding and significant inputs of planning time. There is also a question about the boundaries to any calculation of carbon costs eg a practitioner organisation could be creating extensive wetlands on peat and thus conserving carbon.</p>
15.	<p>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?</p>
	<p>We would be opposed to the collection of data if it were used to oppose open habitat creation. The collection of the data is no doubt desirable.</p>
16.	<p>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?</p>
	<p>Surely this is a discussion for the England BAP planning process. These considerations should be discussed nationally. This policy should be about delivery of the current targets. We believe that any discussion on this issue should be carried out separately. FC should be putting the case for woodland creation to offset the highly desirable creation of open habitats.</p>
<p>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</p>	
17.	<p>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>
	<p>This is a matter entirely down to the practitioner organisation and funders. There is a role for FC to demonstrate more dynamic management of forest habitats and for Natural England to look more closely at 'favourable condition'. We would like to see the 20k ha of Thetford Forest managed more dynamically with extensive grazing of the forest. We would wholeheartedly support a mosaic similar to the New Forest.</p>

No	Question.
	These are big issues for debate and need there own discussion.
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 above
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 comment
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>Option 1 is too focussed on the costs. Whilst these are undoubtedly important the factors that impact on the funding available especially through HLS are so complex that to base a policy on this would appear futile. A small percentage shift in modulation would create significant sums for funding. Abandonment of agri environemnt support would have obvious consequences.</p> <p>In reality schemes progress with the likelihood of funding either for land purchase or management agreement. No one can see beyond the 10year scheme horizon but these are risks we take.</p> <p>Option 2 would be the prefrrred approach as it emphasises the biodiversity driver which is the reason for carrying out this work.</p> <p>Option 3 is based on a premise that the rate of woodland creation is not going to increase to keep pace with open habitat creation. FC should be pursuing a parallel policy of woodland expansion to meet and exceed the area allocated for open habitat.</p>	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
<p>The BAP targets are a UK government policy. Third party practitioners are helping meet this target. The costs of land purchase, restoration and management are only partly covered by UK government funding. To impose on non statutory bodies an additional requirement to presumably purchase and create woodland would significantly reduce the amount of open habitat creation and for many organisations who are delivering on the target it would mean the work could not be carried out.</p>	

No	Question.
	We would argue that FC on behalf of the government should be planting additional woodland to compensate for the anticipated area of open habitat creation and should be making this case to government.
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 comment
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	No comment
Other comments	
We welcome your input on any other aspect of this consultation.	
No comment	

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.