

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:	Paul Harris
Your organisation (if any):	North York Moors National Park
Date:	22 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?
We have been reasonably satisfied with current rates of deforestation carried out for positive reasons in the North York Moors and so the answer would be 'yes'. However, there may be significant opportunities to do more as noted under 'Other Comments' below.	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
If there is a need to meet current commitments regarding total forest cover then it may be more important to appropriately incentivise woodland creation than to reduce opportunities for deforestation in important locations.	
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	

No	Question.
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>In general we support the view that transitional habitats, mosaics of open/wooded habitats, and development of diverse habitat networks can create (and in some cases recreate) landscapes of greater resilience and higher biodiversity and landscape value than the forested (or open) habitats they replace. Encouraging economic activity related to forestry and farming might be appropriate where these activities can maintain diversity and open habitat features at less cost than removing all tree cover.</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'?
<p>We agree that no ancient woodland sites should be removed (although in the uplands we do accept that woodlands can be considered more 'mobile' in some situations and some loss of impoverished ancient woodland may be acceptable where new native woodland is established nearby). We feel that retaining all 'mature native' might be too prescriptive and can foresee situations where removal might be acceptable without loss of biodiversity (particularly where mature woodland has been grazed for long periods or where it has had little or no connectivity with other suitable habitats). Flexibility in the interpretation of mature woodland might be better.</p>	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
<p>For the reasons noted above, and with the possible exception of ancient woodland sites, we would prefer to see local flexibility in the interpretation of 'mature woodland'.</p>	
<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>Local participation is important and we would expect an appropriate level of consultation to be carried out before major projects are taken forward. In the North York Moors we do not envisage major opposition to deforestation proposals and so option 2 (softer approach to encourage high quality engagement) would generally meet local needs. However this needs to be flexibly applied depending on circumstances.</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?
<p>Yes.</p>	
<p>We will apply a framework for evaluation to projects</p>	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?

No	Question.
	<p>Use of the framework seems sensible 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 upland heathland restoration and landscape enhancement is the primary driver.</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>We have no strong views on this but the North York Moors National Park Authority may be able to assist applicants with their evaluation where our own objectives are being supported.</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>We think that there should be no threshold and potential restoration projects should be judged on their merits. Being required to provide compensatory planting might prevent certain landowners from progressing projects which provide high public benefits. In some cases retaining 20% or more woodland cover on a site has proved an effective means to progress proposals in the North York Moors.</p>
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
<p>Key variables 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>
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>Yes, but not to the detriment of the restoration objectives. It might be important to restore a site before economic maturity for example. Also, removal of brash may contribute significantly to the restoration of the target open ground vegetation. More emphasis might be placed on how restoration of habitats is carried out on peat soils to minimise emissions.</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?
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?
	In the North York Moors we feel that developing resilient habitat networks will be more urgent (in the short term) than reducing emissions.
	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?
	In many cases we think that developing biodiverse and sometimes dynamic and changing habitat networks can be more effective than restoration to 'favourable condition' for any given habitat. In general we would be in favour of this approach, which can increase resilience as well as biodiversity at the landscape scale. However this needs careful consideration and may not apply in all cases.
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?
	We would like to continue down the route of developing more resilient habitat networks. We would be happy to see flexibility in the development of networks, where strict adherence to habitat restoration principles would be less important for most species to benefit. Important sites, habitats or species within the networks might require a more careful approach to how the restoration process is judged but in many cases it would be appropriate to accept that restoration can involve moving in the right direction.
	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?
	Our impression in the North York Moors is that some, but not all, proposed projects are on land with poor access and support crops of low timber value which are unlikely to be restocked to commercially viable timber production in subsequent rotations. In these cases there may even be short term benefit to the timber sector in accessing existing crops which might otherwise not be harvested. Present day economic drivers are sometimes not related to continued timber production (for example upland heathland restoration and subsequent use as grouse moor might be more viable than timber production in some situations).

No	Question.
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?
A version similar to Option 2 would be preferred where wildlife potential is realised or maintained. In many cases this may be achieved through management of existing woodland and would not always result in woodland removal.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
Encouraging compensatory planting would appear to be the most appropriate if priority restoration projects proposed by private landowners are to be achieved.	
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?
Yes, although we feel that restoration to open habitats for landscape, as well as biodiversity reasons, should be recognised as important, particularly in national parks.	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Advice and support from the public sector (for example National Park Authorities) could assist private landowners in developing high quality proposals which will help achieve a reasonable balance of public benefits.	
Other comments	
We welcome your input on any other aspect of this consultation.	
The development of greater clarity in the policy on open habitat restoration is welcomed and we see an opportunity here to promote the development of habitat networks in national parks. 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. This 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. We would therefore prefer to see the development of resilient habitat networks given a high priority in the short term.	

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

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

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.