

# 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](http://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](http://www.forestry.gov.uk/england-openhabitats-consultation).

<b>Your name:</b>	Steve Connor
<b>Your organisation (if any):</b>	Northwest Forestry Framework
<b>Date:</b>	5 June 2009

No	Question.
<b>The nature of the change</b>	
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>While the landscape and biodiversity benefits of open habitat restoration are recognised by stakeholders in the Northwest, and it is understood that the quality of woodland areas is every bit as important as extent of woodland cover, concerns over our long-stated strategic aim of extending woodland cover as well as points raised around carbon balance, public acceptability, long-term management and the confidence of the timber lead us to a consensus view that we should set the level of habitat restoration towards the lower levels outlined in the Forestry Commission's evidence papers, in particular so that intervention can be targeted at the most valuable habitats and so that compensatory planting can be achieved to ensure that the region suffers no net loss in woodland cover or carbon store.</p> <p>There is agreement over the kind of woodlands that should be targeted, i.e. lowland plantation forests that have limited value in terms of biodiversity or public amenity. There has also been comment about how the above targets will be combined between our respective regional woodland and biodiversity plans and how targets would be set at a regional level - more clarity here would be helpful.</p> <p>Strategically our existing regional spatial strategy (action EM1D) calls for an expansion in woodland cover across the region and this will remain a priority for the region. In addition, any figure chosen for habitat restoration needs to be on the basis of no net loss and needs to take into account existing tree cover loss through forest design plan implementation, no restocking after windblow etc. There is also a lack of robust data available to provide a sound evidence base for calculating how much woodland cover is being converted to open habitat.</p>	
<b>Desired outcomes</b>	

No	Question.
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>The list of desired outcomes is helpful and encompasses all of the main points raised by our stakeholders. Particular mentions have been made regarding the financial viability of any restoration programme, given previous clearances within our region that have had inadequate management regimes in place and which have reverted to low-quality woodland as a result. The climate change implications of the policy have also been raised by stakeholders and so it is helpful to see carbon balance in the outcomes list.</p>	
<p><b>Measuring the success of the policy</b></p>	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
<p>The indicator set is reasonable and helpful. From a regional perspective it is possible that some of the policy indicators might carry more weight than others given our regional strategic priorities however. As the lead region for DECC on climate change for example, the Northwest has put a low carbon economy as its primary objective and so impacts on carbon stores and carbon emissions could be seen as a key indicator for the region, so the only possible amendment or comment on the proposed indicators might be their relative weighting during the policy evaluation process.</p>	
<p><b>Policy proposals</b></p> <p><b>Elements present in the policy</b></p> <p><b>We will treat woodland and open habitats as potentially mutually beneficial</b></p>	
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>Yes, and this should be high in the 'mix' as the policy is rolled out to avoid overdue public/stakeholder concern that such a programme of restoration will involve the blanket removal of woodland areas. In fact, a clear policy of woodland expansion AND open habitat restoration would be one which could garner genuine support amongst our stakeholders.</p> <p>As a footnote to this response, we would again call for more clarity over what we mean by 'beneficial'. Are we talking about a balanced look at social, environmental and economic benefits; of general 'public benefit' or of biodiversity benefit? This needs full exploration as if deforestation plans lead to local opposition over loss of amenity, then the answer from those local communities to the above question would more likely be a resounding 'no'.</p>	
<p><b>A presumption against removal of 'mature native woodland'</b></p>	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
<p>Absolutely. Where support has been voiced for this policy amongst our stakeholders it has assumed that the target for removal would be 'ill-thought' coniferous forestry plantations, possibly from the latter half of the 20th Century and there would be little support, if not</p>	

No	Question.
	outright objections, to a programme that saw the removal of mature native woodland, particularly given the Northwest's low level of woodland coverage.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	Of our stakeholders who expressed an opinion, there was a question as to whether this is an 'either or' definition. All of the suggested definitions are considered appropriate.
<b>We will expect practitioners to help local users to participate in development of the initial proposals</b>	
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 and engagement should be a priority in all areas of policy, not just the restoration of open habitats: this aspect of the proposed policy is critical, particularly if the programme is not to be met by widespread public condemnation.</p> <p>While the public tends to value natural open spaces every bit as much as woodland landscapes there is an acknowledged risk of a public 'backlash' as a result of woodland removal in favour of open habitats, particularly where these areas of woodland are used for recreation or where they 'screen off' less appealing landscapes such as roads or industry. The Forestry Commission has noted that in the Environmental Impact Assessments for eleven recent open habitat restoration schemes, four met with significant levels of local protest at the planned deforestation.</p> <p>The specific concerns raised by the public included a general objection to the loss of woodland and more specifically: reduction in screening of road noise, landscape change, reduction in carbon sequestration, impact on recreation and fears about housing development. These concerns could be addressed if those carrying out any restoration project undertook extensive stakeholder engagement and more broadly if the wider open habitats policy included an overarching commitment to local engagement.</p> <p>In terms of engaging local users in the application of any restoration policy, at the regional level it is highly likely that this would be a 'site specific' issue depending on the woodland area, its ownership and its location. In some areas the lead could be taken by the Forestry Commission itself while in other areas local authorities, or perhaps our community forests, would be the best facilitators of community engagement. Our regional partners have 'hands on' experience of this, not least through the development of Woodland Visions for our sub-regions or counties, which have wide support from the local community.</p> <p>Finally local participation around landscape issues is a key part of the European Landscape Convention which is guiding the work of partners like Natural England, and so again this is not an optional extra but something that must be included in the delivery of this policy.</p>
<b>We will promote mechanisms for prioritising woodland removal at a regional level</b>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
	Yes. There are mechanisms in place at the regional level to help guide this policy and its

No	Question.
	<p>implementation, including a regional policy context (e.g. new integrated regional strategy and regional forestry framework) and regional leadership groups (e.g. the Forestry Framework Steering Group, Forestry Commission RAC and a regional Sustainable Development Group). At a regional level it would be possible for a coherent view to be taken if a policy of 'no net loss' were pursued and if the aspiration were for a carbon balance to be maintained.</p> <p>On biodiversity per se, it is important to emphasise that we have regional biodiversity action plans, which get broken down into local (sub-regional) action plans. It's in these action plans surely where "what do we want to achieve" gets answered. The action plans may be a good mechanism for public engagement (consultation, education about different habitats' importance, etc) and could help to further ensure that this is an open, transparent and democratic process that is not overly steered by one or two narrow communities of interest.</p>
<p><b>We will apply a framework for evaluation to projects</b></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>If this framework is based around the indicator set proposed in the consultation document, and if help were given around the weighting given to differing indicators, then it is a useful framework for decision making and should be applied. As any habitat restoration programme is highly likely to be dependent on public funding to be taken forward then it seems appropriate for the framework's application to be based around the funding decision for any individual project.</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>This possibly depends on the resources available to the practitioners involved but written guidance, possibly backed up with training if required, should be sufficient. Where there are more complex technical questions involved (e.g. carbon storage in woodland vs. restored peatland areas) then there may be a need for additional guidance and support for practitioners. It is also important that we examine the need for climate change adaptation funding for compensatory planting and management has to be part of the package. Evaluation should also be seen by local communities as transparent and participatory - not a box-ticking exercise.</p>
<p><b>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.</b></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>A threshold level of woodland removal will be critical if national (as well as regional) commitments to sustain and where possible expand woodland cover are to be met. One issue raised by stakeholders in the Northwest is pertinent however. The threshold proposal simply places clearance for open habitats restoration against year-on-year expansion of woodland cover under the assumption that this is the only driver for reduced woodland cover, which may not be the case. Recent years have seen a dramatic drop in new planting levels and discussions are ongoing as to whether we have the monitoring mechanisms in place to give a true and genuine picture of actual woodland coverage</p>

No	Question.
	<p>levels across England. These two issues suggest that open habitats creation vs. year-on-year woodland expansion may not be a zero-sum scenario.</p> <p>With regard to an application mechanism, a regional as well as a national overview of the threshold would be helpful as at the regional level there are mechanisms and partnerships in place to ensure that the threshold is not exceeded. On a project-by-project basis it may be more complicated to apply a threshold particularly if compensatory planting is required, as some voluntary groups or NGOs may acquire a potential open habitat site but not have the lands or the funds to carry out compensatory planting, here a broader focus at the regional or sub-regional level may be more appropriate and would fit in with the monitoring mechanisms we already have in place around our Forestry Framework, our regional spatial strategy and our regional biodiversity action plans.</p>
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p> <p>Given the comments above about reduced planting levels and the genuine then the proposed threshold may well be too high and it may be advisable to set a threshold level closer to the current level of open habitat restoration (500 ha per year) or even lower if there can be no guarantee that there will be a continued expansion of net woodland cover and a positive carbon balance.</p> <p>The importance of working hard to avoid net deforestation should be restated here. Although conservation-focused stakeholders have urged to restrain from over-fixation on woodland cover levels per se (rightly reminding us of the quality not quantity rationale) there is a strong policy context for promoting woodland expansion, not just stasis.</p> <p>The Agenda for Growth for example is the region's strategic framework for forestry and it explicitly recognises that with levels of woodland cover lower than the UK and European average, the Northwest should pursue a policy of 'sensitive' woodland creation and management, particularly where it helps to connect isolated areas of existing natural or semi-natural woodland. The Framework also proposes continued work to create greenspace - woodland - that improves the image of the region, specifically in areas of social need, on derelict and brownfield land and along key gateways and transport arteries. While these may not be the areas of woodland targeted, to avoid net deforestation efforts in these areas will need to be redoubled if we have to compensate for woodland removal.</p> <p>More generally there is widespread support amongst environmentalists and the public alike for an increase in woodland cover. England has one of the lowest levels of woodland cover in Europe (9% versus a European average of 46%) and England's Northwest has even lower levels of cover, at 6.8% of land or just over 96,000 hectares. As a result there is widespread support for an expansion in woodland cover in England, as evidenced in a recent survey of the public by the Forestry Commission (2007) which found that more than 70% of the public supported increased levels of woodland creation.</p> <p>If open habitat restoration targets are set towards the higher, more ambitious end of the proposed spectrum then there would be net deforestation suffered across England, which would be counter to both the policy context and public opinion.</p> <p>This scenario of woodland loss is important if consideration is given to recent, year-on-year reductions in new planting levels referenced above. In the year to March 2008 levels of new planting dropped to just 7,000 hectares, down from 10,000 in 2007 and 18,000 hectares in 2006.</p>

No	Question.
	<p>Once again, with thresholds, there is a unique regional perspective. England's Northwest has very limited woodland cover and so the roll-out of this policy will have a much more dramatic impact in our region than in more wooded areas.</p>
	<p><b>Key variables</b></p> <p><b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b></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>
	<p>Our stakeholders felt there was a lack of data to take this forward and a lack of clarity around which aspect of biodiversity we are examining, given that woodland areas themselves boast distinct and important levels of biodiversity.</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. Any 'carbon sensitive' process should monitor, minimise and where necessary offset its carbon emissions to help the UK achieve the ambitious, world-leading targets set out in the recent climate change bill passed by Parliament. There are a number of carbon footprinting and management tools that could be utilised to achieve this.</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>Yes. Absolutely. At a regional level the Northwest is strategically committed to being a lead region on tackling climate change and so any reduction in our long-term carbon store would be counter to our current policy environment; it would also meet with significant levels of opposition from those working hard to combat climate change. The region has also recently embarked on a promotional programme to encourage the use of timber as a low carbon resource of first choice (a programme called Form&gt;Wood) and so the utilisation of timber as a low carbon product is also a regional priority. There is also a regional biomass strategy and working group which would strongly endorse the consideration of woodfuel within any carbon balance consideration.</p> <p>Finally there is a need to factor in the investment decisions that processors will make based on availability of timber - if we implement a policy that will bring forward 'peak timber' earlier than expected, it will not encourage investment and there will be a loss in business confidence.</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>In 2008 the UK led the world by publishing the first national Climate Change Act which committed the UK to achieving a cut of 80% in carbon emissions by 2050, set against a</p>

No	Question.
	<p>baseline of 1990. It also set out plans for the first ever 'carbon budgets' which will be set each year to keep the UK on a trajectory to meeting its planned target. As a result the carbon implications of all areas of policy or public sector activity will be carefully scrutinised in the future.</p> <p>As the evidence papers published by Forestry Commission make clear, in terms of adapting to climate change, the move to restore open habitats, if handled carefully, could be positive as a mosaic of more diverse habitats could help species to adapt to a changing climate, particularly if those habitats are less isolated, allowing species to migrate more conveniently in response to a shift in climate.</p> <p>Conversely open habitat restoration could have significant negative implications in terms of the UK's performance in reducing and managing carbon emissions. One of the positive aspects of the mass-afforestation programme carried out during the 20th Century was that it created a significant carbon 'sink' of 3.32 million tonnes of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) since 1922. If the higher level goal of open habitat restoration was pursued this would result in a 7% loss of this woodland cover, bringing with it a .23 million tonne CO<sub>2</sub>e loss in sequestered carbon. If the carbon emissions associated with deforestation are added this climbs to 0.53 million tonnes CO<sub>2</sub>e per year. Under Article 3.3. of the Kyoto protocol emissions or removals due to afforestation, reforestation and deforestation have to be reported, so this outcome would be significant given that the UK's current submissions under 3.3 are running at 1.7 million tonnes sequestered in 2006. In short we could put a very large dent in this part of the UK's CO<sub>2</sub>e reporting.</p> <p>The direct impact on the UK's carbon balance would be similarly dramatic. The removal of woodland areas would result in a direct removal of a long-term store of 168 tonnes CO<sub>2</sub>e per hectare, on average. If you factor in the use of timber products from these area as a carbon neutral fuel source or product, this adds another 289 tonnes CO<sub>2</sub>e per hectare over 100 years. In total, woodland removal to open habitat would result in a net direct impact of 457 tonnes CO<sub>2</sub>e per hectare. For a higher level target of 30,000 hectares of open habitat restored, this would commit forestry in England to a release of some 13 million tonnes CO<sub>2</sub>e.</p> <p>As some of the open habitats being targeted are on peatland soils there might be some expectation of these habitats sequestering higher levels of carbon once restored, but once the carbon impact of deforestation has been factored in, alongside releases from peatlands of methane, there is no net gain in CO<sub>2</sub> sequestration.</p> <p>At a regional level the above implications are of vital importance given the Northwest's commitment to be a leading region on climate change. Our current Regional Economic Strategy and the consultation papers around a new, Integrated Regional Strategy (RS2010) place the transition to a low carbon economy and significant curbs on greenhouse gas emissions as a primary strategic objective. In consequence, a policy of open habitat restoration which led to significant emissions of CO<sub>2</sub>e would work against regional policy and strategy at the very highest level.</p> <p>In short this is in many ways a false tension and premise, biodiversity outcomes are of importance, but the region views tackling climate change as a primary objective.</p>
	<p><b>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</b></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</p>

No	Question.
	where success for all sites is based on assessments of condition as applied to SSSIs?
	<p>In principle we agree with the dynamic approach but with a number of caveats: one, we need to ensure a balanced approach that measures a full set of social, environmental and economic outcomes; we also need to remain focused on site-specifics but while also keeping the region's work at a landscape-scale in mind.</p>
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><b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b></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 additional information to supplement that given by both EFIP and ConFor. From a regional perspective the one point to note here is that the processing industries that rely on long-term timber flows do account for a small but important sector of the region's economy and in specific locations, particularly to the North of the region, they are important employers whose confidence and long-term viability is of high importance. These businesses have voiced a genuine concern around these proposals and we would do well to take their concerns on board.</p> <p>With new planting levels currently falling and with heavy focus on planting broadleaved rather than coniferous woodland there is significant concern within the timber industry that we will see a 'peak' in wood supply (particularly softwood) around 2020 with an increased reliance thereafter on timber imports. For timber industry representatives the additional removal of plantation forest under a move towards open habitats would lead to a reduced domestic timber resource and, as a result, a loss in jobs and business. This is an issue that has been discussed at regional fora and which is of concern to our stakeholders.</p> <p>The levels of reduction of softwood supply do not at first glance appear significant. Under the higher level of removal (up to 30,000 hectares) the reduction in resource would be 6% set against 1% for the lower scenario. This higher level of deforestation would, it is estimated, equate to a loss of £18 million per year or 1,500 jobs. While these are not large figures at the national level, they could impact on the confidence of the industry, particularly when it comes to key investment decisions.</p> <p>The confidence of the forestry sector is of importance to the Northwest, where the wider sector generates around £435 million GVA each year and employs almost 70,000 people, often in rural areas that can ill-afford to lose any businesses. It is for this reason that industry body ConFor has called for no net loss in productive forest area as a result of a policy around open habitat restoration. This is a call that we would support even though our sector in the Northwest is focused on processing as a priority, rather than timber production.</p>
<p><b>Different approaches to applying policy</b></p>	

No	Question.
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>Given comments from stakeholders, particularly those engaged in the timber industry, land management, community forestry and climate change, the tendency would be towards the first policy approach 'Making sure that land can be managed in the long term'. If a higher level of woodland removal were introduced, under policy scenarios two or three, then a level of compensatory planting would be welcomed.</p> <p>Also welcome would be a recognition that scenarios two and three could be more relevant at the local, sub-regional or regional scale, rather than a 'top-down' approach. The Northwest has a long tradition of practical and productive partnership work in this area which makes implementation of policy easier if conducted partly through regional mechanisms.</p>	
<p><b>The role of compensatory planting</b></p>	
21.	What is the appropriate role of compensatory planting in this policy?
<p>While compensatory planting would be helpful to assuage a number of concerns, including long-term carbon stores and productive timber flows, it is fair to recognise that this would represent an additional cost to government. If a 'no net loss' approach were to be taken with regard to carbon, timber and woodland cover, it could be that this could be assessed not on a site-by-site basis but through regional or sub-regional partnerships. This would help to ensure that the philosophy of the 'right tree in the right place' was adhered to, it would build on regional research work on where the greatest public benefit could be realised (for example extensive work carried out on Green Infrastructure) and it would release individual practitioners (a Wildlife Trust for example) from an additional burden of woodland creation as they seek to restore an important open habitat. The Northwest has a track record in well-targeted planting, not least through our Public Benefit Recording System which has helped to shape the Newlands programme.</p> <p>Again here the European Landscape Convention has been mentioned by our stakeholders as one of its central tenets is to involve people and local communities: compensatory planting in this regard could be a useful engagement tool at a number of different spatial levels.</p>	
<p><b>Factors to consider when deciding which policy is likely to work best</b></p>	
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?
<p>Our Forestry Framework Steering Group has highlighted a lack of robust data in terms of genuine current loss in woodland cover, this would be a critical gap to plug if we are to get this policy right.</p>	
<p><b>Implications for delivery mechanisms</b></p>	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?

No	Question.
	<b>Other comments</b> We welcome your input on any other aspect of this consultation.
	<p><b>Only one other piece of context is relevant. At a recent Natural England event a workshop was held to explore the open habitats proposals and it was suggested that a (very) long term view of our landscape history might be helpful. An important point of context is that many of the open habitats to which we would return are themselves the result of human intervention:</b></p> <p><b>“By the time humans arrived in significant numbers, during the Mesolithic period, much of the landscape was heavily wooded, except in the highest fells and on the nascent peat mosses. The species composition varied depending on drainage, exposure and the soil parent material: oak predominated on freer draining slopes; ash on limestone; alder on wetter ground in the valleys and on the lowlands. The first major environmental consequence of human activity was woodland clearance, either through deliberate removal or as a result of grazing livestock preventing regeneration.”</b></p> <p><b>Angus Winchester, England’s Landscape: The North West English Heritage, 2006</b></p> <p><b>The proposed programme of open habitat restoration has the early 20th Century in view as a baseline and this is an unhelpful and distorted starting point as this was the historical point at which the UK had its lowest levels of tree cover, ever. A more useful perspective might be that the UK has some of the lowest levels of tree cover in Europe and that the Northwest region has some of the lowest levels of tree cover in the UK. From this perspective, we need more trees, more woodland and more forestry, not less.</b></p>

Please include the “information about you” form with your response.<sup>1</sup>

**Please send your completed forms to:**

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**By 17.00hrs, Friday 5 June 2009.**

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<sup>1</sup> See [www.forestry.gov.uk/england-openhabitats-consultation](http://www.forestry.gov.uk/england-openhabitats-consultation) for a copy.