

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:	Andrew Byfield
Your organisation (if any):	Plantlife International
Date:	5 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>Plantlife supports the aim of restoring 30,000 hectares of open habitat from plantation over the next 10-15 years. This policy should focus on recreation of heathland and other open habitat from plantation, and should be seen as separate and additional to the 'Achieving Condition' target for existing heathland as identified in the Lowland Heathland and other Habitat Action Plans.</p> <p>We support the long term aim of the UK Biodiversity Action Plan to double the current area of lowland heathland in England, currently c. 58,000 hectares. For reasons detailed below, this should in large part be delivered through restoration from conifer plantation on state land, and accordingly believe that it is important that short, medium and longer term targets are set now, based on age class of stands.</p> <p>For a number of reasons listed below - Plantlife supports the creation of large landscape-scale open habitats as opposed to the creation of many small, disparate fragments of open habitat within a much larger afforested landscape. The benefits of this approach are many:</p> <ul style="list-style-type: none"> - allows species to develop metapopulations, ensuring that they are less prone to catastrophic extinctions; - allows species the ability to move within a large site - taking advantage of differences in moisture, aspect, microclimate etc - to counter the likely problems associated with changing climate - ensures that recreated heathland landscapes support the full spectrum of microhabitats associated with extensive pastoral heathland districts, including dry and wet heath, mires, seasonal pools, dry and wet acidic grasslands, holly holms, bracken brakes etc. Only by

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	<p>recreating such diversity will it be possible to reinstate a full heathland flora - indeed, many of these habitats / microhabitats are of greater importance to vascular plants than 'normal' dry, ericoid heathland (Byfield & Pearman 1994)</p> <p>-Allows the effective reinstatement of extensive grazing systems, that are key to the provision of early successional vegetation communities so important to the maintenance of a rich heathland flora - as recognised in the Forestry Commission evidence paper (Forestry Commission, 2008; also Byfield & Pearman 1994; Byfield 2009; Lake 2002). Extensive grazing stock require substantial areas, and a diversity of vegetation types, through which to roam, utilising different habitats on a seasonal basis. (Putnam et al. 1987; Tubbs 1997).</p> <p>- Allows the recreation of extensive, historic open landscapes - effectively creating 'new' non-statutory commonland, of immense importance for visitors, reducing pressure on existing key open habitats.</p>
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
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	
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 relation to open habitat and non-native plantation, we do not accept that it is mutually beneficial to retain both habitats in close proximity from a botanical viewpoint.</p> <p>Nevertheless we acknowledge that 'classic' heathland landscapes include substantial areas of woodland, particularly in the form of pasture woodland. Indeed such woodland is integral to the success of grazing systems in large-scale, extensive heathland landscapes, for example Burnham Beeches, Windsor Forest, and, pre-eminently, the New Forest.</p> <p>In recreating open heathland landscapes, priority should be given to restoring moderate to easily restored areas of former SAC UK BAP Priority open habitats, as well as former pasture woodland, thereby creating the 'mutually beneficial' mosaic of woodland and open habitat.</p>	

No	Question.
	<p>In relation to newer woodland, we strongly support the restoration of all priority open habitats, where these can be restored with moderate or greater ease, as a priority over retaining new woodland. We believe that studies similar to ones undertaken at Ringwood Forest (commissioned by Plantlife; Sanderson 2004) and Hurn Forest (commissioned by FC; Sanderson 2007) represent an excellent way of identifying potential for open habitat recreation in a cost effective manner - these clearly identified areas which would prove largely or wholly impossible to restore to open heathland and mire, and could most satisfactorily be retained as woodland.</p> <p>From a botanical viewpoint, the interface between woodland (of the right type) and open habitat is perhaps more valuable in calcareous grassland situations - recognising that species such as Lady Orchid (<i>Orchis purpurea</i>), Fly Orchid (<i>Ophrys insectifera</i>) and many other 'woodland' species are indeed more typical of well illuminated margins of woodland.</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>Plantlife broadly supports the basic premise that ancient and 'mature' native woodland should not be removed, particularly if woodland is deemed to have a tree cover of as little as 20%, and therefore glading and thinning of woodland cover is still permitted. We see at least three situations where some removal of these desired woodland types might be beneficial from a nature conservation viewpoint:</p> <p>i) In restoring pasture woodland that has developed a dense canopy cover through lack of management. Undertaken through glading and thinning of younger trees;</p> <p>ii) In allowing the restoration of representative examples of mesotrophic grassland and grass-heath / lawn communities within heathland, that - due to their inherent relative fertility - rapidly developed a tree cover following cessation of management (and therefore now support the oldest woodland cover). Such mildly acid grasslands support a rich flora, and their loss has been especially great, both through natural succession to woodland and through higher rates of agricultural reclamation. Such grasslands are also often key in allowing the successful re-establishment of extensive grazing regimes. A good selection of representative samples should be restored - perhaps as substantial glades within 'new' pasture woodland.</p> <p>iii) To ensure connectivity of open habitats and to permit the spread and colonisation of priority open habitat species.</p>
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
	<p>See above.</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>We fully acknowledge the need for active local participation in the decision making</p>	

No	Question.
	process.
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?
	<p>Plantlife supports the need to prioritise woodland removal at the regional level - for example through the Forest Design Plan process - provided that regional staff are guided by national biodiversity and landscape targets.</p> <p>Regional staff should take full account of the needs to deliver the various species and habitat-related targets/commitments dictated by:</p> <ul style="list-style-type: none"> - the UK Biodiversity Action Plan (Species and Habitat Action Plans) - the EU Habitats Directive - Local Biodiversity Action Plans
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?
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?
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.	
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>Whilst Plantlife recognises and supports the need to maintain woodland cover in England, we do not support the principle of setting a fixed threshold rate of woodland removal in order to create open habitat. We recognise:</p> <ul style="list-style-type: none"> - the importance of meeting government policies / targets on maintenance and enhancement of open priority habitats, and believe that these should be delivered at the most appropriate time, taking account of plantation harvesting dates / ease of restoration of heathland etc. - there should not be a compulsory, direct link between the need to find new compensation land for tree planting in order to precisely match any woodland cover lost through clearance for open habitat restoration. <p>Nevertheless we do support the 'informal twinning' approach to creating new woodland,</p>

No	Question.
	and suggest that this should be achieved by undertaking a three-year retrospective review of open habitat clearance and new woodland creation - taking necessary measures to 'top up' the area of woodland created as necessary.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	We do not support any proposed threshold for open habitat creation on an annual basis - any threshold should be determined on a 10-yearly basis, acknowledging the programme of open habitat creation and of new woodland planting to be a long-term one not 'straitjacketed' by annual quotas.
<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?
<p>Different biodiversity gains can take vastly different periods of time to establish, but to maximise gains in the shortest timescale, we strongly support the need to develop a series of strategic, large landscape-scale projects, as opposed to a larger number of small, ad-hoc open habitat recreations. Larger projects will benefit from better feasibility planning, and with proper restoration and maintenance funding / management delivering clear biodiversity gains within the shortest timescale.</p> <p>Key in delivering effective restoration projects is the need to undertake studies similar to ones drawn up for Ringwood and Hurn forests in the East Dorset forest district (Sanderson 2004, 2007): these studies give a clear picture identifying areas that would restore to heathland (or other valued priority habitats) in the shortest time. These should be supplemented with studies similar to the biodiversity audit currently proposed for Breckland, which should go a long way towards identifying key areas for restoring lost plant populations based on geology, historic plant records etc.</p>	
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>Plantlife supports the need to adopt management best practice to minimise carbon emissions during restoration.</p> <p>However, we do not wholly support the restoration reduction measures outlined in the report. To restore good quality heathland - and chalk grassland and other open habitats - from plantation or secondary woodland quick gains are only achieved if the ground is restored to the original soil level present at the time of original planting. This has the closest chemical and physical characteristics that allow the recreated heathland / grassland to develop on, and additionally offer contains significant and important seed banks of desirable species (36,000 heather <i>Calluna vulgaris</i> seedlings were estimated in 1sq metre of former plantation in the New Forest where an accidental burn had exposed the original mineral soil, whilst the UK BAP priority species Purple Milk Vetch <i>Astragalus danicus</i> reappeared by the hundreds following tree felling and stump removal at an FC</p>	

No	Question.
	<p>site in Breckland, both most probably from buried seed.)</p> <p>So Plantlife supports felling of trees when they are economically mature (although expediency may be required in very specific sites), but we nevertheless do believe that arisings should be stacked or removed, and destumping / soil disturbance may be necessary after careful consideration.</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>
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>Plantlife believes that delivery of biodiversity targets and meeting carbon emission and sequestration targets are of equal importance, but the urgent and fully acknowledged need to minimise carbon emissions should not be used to abrogate our duties in terms of recreating open habitats through the England Biodiversity Strategy and UK BAP targets.</p> <p>The significant role of open habitat such as old, permanent grasslands, heathlands and peatlands in sequestering carbon is increasingly recognised (e.g. Harvey 2008), and should not be underestimated when considering schemes to recreate open habitats.</p> <p>Ultimately, perhaps the most significant means of reducing overall carbon emissions could be achieved though planting of new woodland, provided that there is no direct link between open habitat creation and compensatory planting. In carbon terms, such planting could take place anywhere on earth, and there is no reason why a greater area of forest should not be newly planted than the area of open habitat restored, provided that key biodiversity, landscape and other heritage constraints are not compromised.</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>Overall we do not support the concept of a more dynamic attitude to land management on land outside SSSIs, though ultimately this should be determined on a site-by-site basis. Retained tree cover on heathland restoration projects should be in line with the Common Standards Monitoring thresholds (10-15% on heathlands). In particular, we have serious concerns about retaining considerable tree cover within heathland restoration areas, if:</p> <p>(i) UK BAP and SAC priority habitats could otherwise easily be restored, yet this potential is not allowed to develop due to the retention or replanting of tree cover;</p> <p>(ii) Retained trees act as a seed source that exacerbates the problems of tree regeneration on heathland.</p> <p>In botanical terms we have particular concern about temporary / rotational tree cover on heathland. This habitat - temporary heathland - fails to allow the full spectrum of</p>

No	Question.
	<p>heathland landscape habitats to develop, and is of very low value to plant species, as most species are incapable of colonising such areas in the short time periods when 'open' ground may be available. Just 5 of the 32 vascular plant Priority Species can utilise this habitat - all prefer areas of open, permanent heathland and associated habitats (Byfield 2009).</p> <p>Nevertheless, the final decision is based on the scale of the overall site being managed. Landscape scale restoration schemes, that include blocks of heathland or other open habitat of at least 50 ha. interspersed with restored pasture woodland and some plantation on difficult-to-restore land may be appropriate in certain circumstances.</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>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>Impact on the timber industry can be minimised by:</p> <ul style="list-style-type: none"> i) allowing plantation timber to reach maturity and harvested at projected fell date (as illustrated by Figure 1, Spencer & Edward, 2009); ii) focussing clearance activities in part - though not exclusively - on timber stands with low yield classes; iii) identifying areas for new woodland creation, ideally providing a higher yield than some current standing forest crops. <p>Nevertheless, it is important to sit the current proposals in context. The Countryside Survey 2007 indicates an increase in woodland cover in England from 1,128,000 hectares in 1990 rising to 1,238,000 hectares by 2007 (ie. roughly 20 times the level of heathland cover in England): this represents an average increase in woodland cover of 6,470 ha per annum, and an overall percentage increase of 9.75% on the 1190 figure over the 17 year period. Even the higher annual open habitat creation of c. 3000 hectares per annum is well within this limit.</p> <p>Furthermore, we fully support the creation of new woodland - ideally to benefit biodiversity in ancient woodland-rich areas - and would accept the creation of new commercial forestry in areas with low biodiversity and low landscape heritage interests. Our ethos is very much 'right tree, right place'.</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</p>

No	Question.
	either on a combination of these approaches or on new ideas?
	<p>Plantlife does not support any of the three options. Instead, we support the development of significant, landscape scale projects that maximise benefits in a cost effective manner, through their scale, through detailed project planning, and through focusing adequate resources onto flagship projects.</p>
<p>The role of compensatory planting</p>	
21.	What is the appropriate role of compensatory planting in this policy?
	<p>Plantlife might support the concept of 'informal twinning' of woodland removal projects with woodland creation projects, and accepts that this could go a long way towards negating the impacts (perceived or otherwise) of open habitat recreation on carbon capture and the timber industry supply chain.</p> <p>We would nevertheless totally reject any policy which imposes a condition of compensatory woodland creation as a prerequisite to permitting permanent woodland removal as part of an open habitats restoration project.</p> <p>Ultimately, felling approval for projects that restore and recreate international and national priority habitats and associated species must not be conditional on the establishment of new plantation.</p>
<p>Factors to consider when deciding which policy is likely to work best</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>Implications for delivery mechanisms</p>	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
<p>Other comments</p> <p>We welcome your input on any other aspect of this consultation.</p>	
<p>References:</p> <p>Byfield, A.J. (2009). Comment: heathland, plantation and the Forestry Commission - a botanical perspective. British Wildlife 20: 267-272.</p> <p>Byfield, A.J. & Pearman, D.A. (1994). Dorset's disappearing heathland flora: changes in the distribution of Dorset's rarer heathland species 1931 to 1993. Plantlife, London / RSPB, Sandy.</p> <p>Forestry Commission (2008). Restoration of open habitats from woods and forests in England: developing Government policy: evidence. Forestry Commission, England.</p> <p>Harvey, G. (2008). The carbon fields: how our countryside can save Britain.</p>	

No	Question.
	<p>Grass Roots Publishing, Bridgwater</p> <p>Lake, S. (2002). The role of livestock grazing in the conservation of lowland heath. DPhil Thesis, School of Biological Sciences, University of Southampton.</p> <p>Sanderson, N.A. (2004). Towards a nature conservation vision for Ringwood Forest. Plantlife, Salisbury.</p> <p>Sanderson, N.A. (2007). A landscape ecological assessment of Hurn Forest. Unpublished report for Forestry Commission.</p> <p>Spencer, J. & Edwards, R. (2009). Open habitats and open habitat potential on the Forestry Commission public forest estate. Project Report, Forestry Commission.</p>

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.