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:	Nick Phillips
Your organisation (if any):	The Royal Society for the Protection of Birds (RSPB)
Date:	04/06/09

Introduction

The RSPB works in partnership with others, including the Forestry Commission England, on the conservation of priority open habitats, in particular we work to re-create lowland heathland – a key habitat for birds and other wildlife, as well as for public enjoyment and well-being. The RSPB owns and manages approximately 2,400ha of lowland heathland and are currently re-creating over 200ha from plantation forestry as part of developing our reserve network.

The RSPB is also actively involved in the protection and enhancement of England's native woods to meet priority species and habitats targets under the UK Biodiversity Action Plan, England Biodiversity Strategy, England's Trees, Woods & Forests and for designated sites. We own and manage approximately 8,800 hectares of woodland. We are creating and regenerating woodland on approximately 2,000ha, as part of developing our reserve network. We are also working with partners to create even larger areas. In Scotland, we are involved in a landscape scale initiative with other land owners to create over 10,000ha of native woodland. In North West England, we are working with United Utilities to establish nearly 500ha of upland oak woodland on 22 farms by 2010, with more proposed with water companies for the following five years.

Summary

The RSPB welcomes the opportunity to respond to this consultation and is keen to comment on the resulting detailed government policy proposal for the re-creation of priority open ground habitats from forestry and early successional woodland in England. We are also keen to be involved in a public consultation on the delivery plan for the public forestry estate.

The delivery of an ambitious, targeted policy is the most **significant** and **cost effective** step government can take to meet the UK Biodiversity Action Plan (UK BAP) targets for these priority open ground habitats and associated species. An ambitious policy is essential if government is to meet its existing commitments to safeguard this asset and its associated biodiversity, amenity and cultural value for future generations. In climate change terms, an ambitious policy would make a significant contribution to adaptation, whilst the potential to mitigate UK carbon emissions, by restocking plantations on open habitat, is negligible.

A summary of our specific policy aspirations are detailed below:

- **Priority open habitats, such as lowland heathland and raised bogs, are part of England's Critical Natural Capital[1], and should be re-created where there is a biodiversity benefit and potential to do so**.

- The open habitat potential under plantation forestry and early successional scrub should be fully mapped, assessed and prioritised for biodiversity delivery to determine short, medium and long term targets as a contribution to the delivery of the England Biodiversity Strategy.

- **It is important for this policy to set short term targets for re-creation based on age class of stands, to help plan efficient implementation mechanisms, optimise timber yield and focus delivery of government biodiversity commitments.** We support the modest and achievable UK BAP target for increasing the extent of lowland heathland by 9,150 ha by 2020 as the bare minimum whilst policy takes effect, but expect delivery to significantly increase and exceed this figure as implementation mechanisms are established.

- **Re-creation of open habitats from lower yield class plantations, which are a priority for biodiversity, should be prioritised in the early stages of policy implementation.** This should ensure a step change in open habitat re-creation, whilst encouraging monetary savings through reduced grant support for plantations of low economic value. It should facilitate the re-direction of timber production effort to higher yielding sites, whilst delivering government biodiversity commitments in the most sustainable areas.

- The RSPB supports the long term UK Biodiversity Action Plan (UK BAP) aim to double the current area of lowland heathland in England (55,000ha[2]), through re-creation of former areas of this habitat. **Based on the potential under plantation forestry (c60,000ha[3]) and the significant advantages in terms of restoration, cost and biodiversity[4], it is expected that the majority of this should be realised from areas now under plantation forestry, over the next 40 – 60 years (forestry cycle).**

- **The RSPB believes this policy is a key test of the government's ability to deliver the full range of public benefits, notably re-creation of priority habitats to meet biodiversity action plan targets, on its own estate.** . The Forestry Commission England manages the largest area of unrestored lowland heathland under forestry. This damaged, but largely repairable biodiversity resource should be re-created, which would enable the UK Government to meet most of its own target for re-

[1] 'Critical Natural Capital' refers to biodiversity, related environmental goods and cultural value that can only be realised on a specific site/environment, which has taken thousands of years to develop and once lost is gone forever. This gives it a unique importance as part of the nation's non-renewable natural asset base. A clear example is ancient semi natural woodland (ASNW) and heathland, both are 'site unique'. A recent conifer plantation by contrast has significant natural value – but a value that is transferable by removing trees from an ASNW or priority open habitat and replanting them on an arable or Brownfield site.

[2] UK BAP lowland heathland revised (2006) targets http://www.ukbap-reporting.org.uk/outcomes/targets_nationals.asp?C=3&X=%7B830BBA17%2DBE3F%2D4C7B%2D993F%2DD8625DD5D516%7D

[3] Restoration of open habitats from woods and forests in England: developing Government policy: evidence Dominic Driver 22 November 2008 http://www.forestry.gov.uk/pdf/eng-open-habs-evidence.pdf/$FILE/eng-open-habs-evidence.pdf

[4] K.J. Walker, R.F. Pywell, E.A. Warman, J.A. Fowbert, A. Bhogal, B.J. Chambers (2004) The importance of former land use in determining successful re-creation of lowland heath in southern England, Biological Conservation, 116, 289-303.
A. Byfield (2009) Comment: Heathland, plantation and the Forestry Commission: a botanical perspective British Wildlife 20 (4), 267 - 272

creating this important habitat.

A summary of our general comments:

- The Habitats Directive requires EU Member States to maintain or restore the habitats and species of European importance listed in the Annexes to the Directive to "favourable conservation status". Of the 6 heath and scrub habitat types present in the UK, 5 are in Unfavourable-bad condition. All of the bog, mire, fen and grassland habitat types present in the UK are in Unfavourable-bad condition (and three are deteriorating)[5]. **An ambitious re-creation policy should play a key part in meeting these commitments in the future.**

- A habitat listed in Annex 1 of EC Directive 92/43/*EEC on the conservation of natural habitats and of wild fauna and flora,* as a habitat of Community interest[6]; or as a UKBAP priority habitat[7], should be considered a higher ecological priority than any that are not so listed, including plantation forestry.

- The Strategy for England's Trees Woods and Forests (ETWF) recognises the biodiversity need to re-create lowland heathland and other open habitats by removing non-native plantation forestry[8]. A key principle of this government strategy is 'the right tree in the right place'.

- **Removing trees from places where they should not be is fully in keeping with the UK Government's international agreements on sustainable forest management**, via the UK Forestry Standard and its associated Forest Guidelines. Meeting the UK Forestry Standard is a requirement for all forestry work approved by the Forestry Commission, including heathland re-creation. This includes public consultation and covers the conservation of biodiversity, water, soil, landscape and archaeological interest during site planning and management.

- Removing trees from lowland heathland, peatland and other priority non-woodland habitats is fully compliant with the voluntary UK Woodland Assurance Standard (UKWAS) - the UK's international Forest Stewardship Council compliant national standard.

- **We recognise the role of woodlands in helping species adapt to climate change, but this means a planned expansion of native woodlands in the right places, not retention of plantations in the wrong places.** As with all climate mitigation action, woodland management, creation, and restoration should be undertaken using the principles of sustainable development. This means appropriate spatial planning, so that woodland can find its place amongst the range of land uses, which will form part of a low-carbon, sustainable future for our natural environment.

- **This policy has potential to help species adapt and move in response to climate change, through open habitat re-creation.** If sufficient habitat is not provided for them in the UK, then there is a risk that species become the victims of the problem we all claim we are trying to solve.

- The English forestry strategy does not list 'carbon capture' as a primary role for

[5] http://biodiversity.eionet.europa.eu/article17

[6] http://www.jncc.gov.uk/Publications/JNCC312/UK_habitat_list.asp

[7] http://www.ukbap.org.uk/habitats.aspx

[8] '...it may be necessary to remove plantations and naturally colonised scrub, for the purpose of recreating or maintaining valuable open habitats such as heath and bog' Objectives, paragraph 36, page 23 in: Defra (2007) *England's Trees, Woods & Forests*. Department of Environment, Food & Rural Affairs, London.

woodland management. However, carbon storage and sequestration is a serious issue and opportunities to explore sustainable ways to maximise this should be investigated, but the objective should be to ensure that carbon issues are integrated with other environmental and adaptation objectives. The **'carbon' aspects of different land uses and management methods are not yet clearly understood** and this consultation pre-empts the Forestry Commission GB scientific review of forestry and climate change and the development of the *Forests & Climate Change Guidelines.*

- **The RSPB does not support an England scale threshold rate or limit for open ground habitat re-creation from forestry**. We suggest a supportive approach is adopted, where the UK situation is reviewed after three years of policy implementation and addressed as necessary through improved support /encouragement for woodland establishment if needed (i.e. not based on direct compensation).

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?

The RSPB supports the long term UK Biodiversity Action Plan (UK BAP) aim to double the current area of lowland heathland in England (55,000ha[9] = approximately the size of the new forest national park), through re-creation of lowland heathland on former areas of this habitat. Potential currently under other land use, such as agriculture or mineral extraction may also be appropriate for open habitat re-creation. However, based on the potential under plantation forestry (c60,000ha[10]) and the significant advantages in terms of restoration, cost and biodiversity[11], **it is expected that the majority of this should be realised from areas now under plantation forestry, over the next 40 – 60 years (forestry cycle).**The open habitat potential under plantation forestry and early successional woodland should be fully assessed, mapped, and prioritised for biodiversity delivery to determine a specific target for re-creation from plantation forestry. It is crucial to have an ambitious policy in terms of scale, but is equally important that this is delivered in the right place, to maximise biodiversity gain over a realistic and practical timescale.

The rate of open habitat re-creation needs to increase on current levels, to help safeguard this threatened biological resource. Although it is not envisaged or practical to re-create all the sites within 10 – 15 years, therefore a phased approach to maximise biodiversity gain is appropriate. We suggest that a forestry cycle (40 – 60 years, depending on growth) is a more appropriate timescale, fitting re-creation into existing felling plans, without subsequent replanting. This will help minimise

[9] UK BAP lowland heathland revised (2006) targets http://www.ukbap-reporting.org.uk/outcomes/targets_nationals.asp?C=3&X=%7B830BBA17%2DBE3F%2D4C7B%2D993F%2DD8625DD5D516%7D

[10] Restoration of open habitats from woods and forests in England: developing Government policy: evidence Dominic Driver 22 November 2008 http://www.forestry.gov.uk/pdf/eng-open-habs-evidence.pdf/$FILE/eng-open-habs-evidence.pdf

[11] K.J. Walker, R.F. Pywell, E.A. Warman, J.A. Fowbert, A. Bhogal, B.J. Chambers (2004) The importance of former land use in determining successful re-creation of lowland heath in southern England, Biological Conservation, 116, 289-303.
A. Byfield (2009) Comment: Heathland, plantation and the Forestry Commission: a botanical perspective British Wildlife 20 (4), 267 - 272

No	Question.

potential timber loss and ensure re-creation is at an achievable rate. If prioritised areas are restocked, the cost of re-creation will increase as the soils and conditions needed for re-creation will be further degraded[12], leading to the loss of Critical Natural Capital, which once lost is gone forever. The opportunity to meet government commitments for these open habitats from forestry is likely to be more economic than from other land uses, such as agriculture, and should be realised whilst it can.

It is important for this policy to set short, medium and long-term targets for re-creation based on age class of stands, to help plan efficient implementation mechanisms, optimise timber yield and focus delivery of government biodiversity commitments. However, we believe it is impractical to set annual targets**.** We support the modest and achievable UK BAP targets for increasing the extent of lowland heathland by 9,150 ha by 2020 as the bare minimum whilst policy takes effect, but expect delivery to significantly increase and exceed this figure as implementation mechanisms are established.

The UKBAP targets for other priority open habitats should be used as the bare minimum whilst policy takes effect. Where priority open habitats do not have relevant UKBAP targets, the potential under plantation forestry should be mapped, assessed and prioritised for biodiversity delivery in conjunction with Natural England, to determine short, medium and long term targets.

Desired outcomes

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

No, we do not think the desired outcomes are a reasonable list and we do want to suggest amendments.

The desired outcomes set the tone for policy delivery. We are disappointed with the proposed outcomes in the consultation, which are predicated on perceived problems of re-creation. The outcomes in the step 1 paper are centered on the policies key drivers, "Government objectives for biodiversity and habitats are the principal drivers of the policy along with landscape and cultural heritage as secondary drivers"[13], this **is consistent with government commitments on biodiversity, amenity and recreation.** However, the consultation has now changed this focus, suggesting that six of the seven desired outcomes for this policy should be on mitigating perceived problems with open habitat re-creation, which is an inappropriate balance.

We are disappointed with the absence of desired outcomes for positive impacts on cultural heritage and landscape, which were present in the step 1 paper and are drivers of this policy. Social, historical and cultural reasons for re-creating open habitats are important, but this has been played down throughout the policy documentation and evidence papers. Re-creation of open habitat can provide important opportunities to improve the understanding and access of sites of archaeological interest. The emphasis on these factors should be reasserted.

The RSPB considers the outcomes in the Step 1 paper as a reasonable list of desired outcomes, because they reflect the policies key drivers:

- Ecologically robust open habitats with secure long-term management regimes in place.

[12] R.F. Pywell, R.J. Pakeman, E.A. Allchin, N.A.D. Bourn, E.A. Warman, K.J. Walker (2002) The potential for lowland heath regeneration following plantation removal, Biological Conservation, 108, 247, 258

[13] Forestry Commission (2008) Restoration of open habitats from woods and forests: Policy development step 1 of 9: fit progress to date into a policy cycle, www.forestry.gov.uk/england-openhabitats

No	Question.

- The declining trend in populations of key open habitat species is reversed.
- Changes in landscape due to re-creation of open habitats from woods or forests improve the quality of life of people who experience that landscape.
- People now and in the future can learn through direct enjoyment of the outdoors how history has shaped the landscape.
- The condition of historic features in open habitats restored from woods and forests improves and key cultural and designed landscapes are retained.

Such an approach is consistent with a rationale that the main case for government intervention in forestry is to deliver public goods in the form of amenity, recreation and biodiversity outputs[14]. All sixteen of the desired outcomes for the government policy on England's Ancient and Native woods[15] are about the positive aspects of improving their protection, extent, quality and value to local communities, this acknowledgment in policy should be extended to priority open habitats.

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?

No. The RSPB does not support desired outcomes and indicators based upon perceived problems with re-creating open habitat. For example, the wording of the positive engagement by local and other users indicator suggests only negative reactions will be measured, with no attempt to balance with positive user reaction, which our experience suggests is great.

The RSPB would welcome substantive discussion with Forestry Commission England, Natural England and Defra on appropriate indicators that reflect the policies key drivers of biodiversity, people's enjoyment of the landscape and cultural heritage.

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?

Within the context of recently established woodland and plantation on open habitats, No.

We believe that there is a biodiversity value to the ecotone between well established semi-natural woodland and open habitat that some specialist species need, and that these can have great intrinsic landscape value. There is a value to biodiversity of early successional scrub, small copses and feature trees on open habitats – the proportion of which will vary according to the sensitivity of the habitat and management implications; however this is not within the scope of this consultation. For many habitats, such as blanket and raised bog, this is wholly inappropriate, as the retention of trees will further

[14] CJC consulting (2003) Economic Analysis of Forestry Policy in England, Final report for the Department for Environment, Food and Rural Affairs and H. M. Treasury

[15] Forestry Commission England and DEFRA (2005), Keepers of time, a statement of policy for England's ancient and native woodland, http://www.forestry.gov.uk/keepersoftime

No	Question.

damage the nature conservation interest and related hydrology.

The Common Standards developed by JNCC for favourable condition identify an appropriate balance of trees and scrub cover on designated open habitats - **less than 15%** for lowland heathland. This is sufficient to provide for the biodiversity that requires edge ecotones, successional scrub etc, and to contribute to landscape appeal.

A key issue with recently established woodland is that of ecologically isolating remaining open habitats. The lowland heathland in England survives in over 3,000 fragments, the average of which is 17.8 ha[16]. The average size in 1900 is likely to have been in excess of 500 ha. This fragmentation restricts mobility in many of the specialist open habitat species, making them vulnerable to extinction in response to major perturbation, for example fire, and to the movement of suitable climatic space.

Some terms used in this consultation, such as 'restoration from woods and forests' are ambiguous and are likely to inhibit public support. It is important to use clear and open language within policy to gain public support, including explicit acknowledgement that these areas were recently nationally important open habitats and have been lost to conifer plantation or through lack of management. If the Government is keen to gain public support for open habitat re-creation, then it is paramount that the benefits are adequately portrayed, which this process has failed to do.

A presumption against removal of 'mature native woodland'

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

The RSPB supports this principle.

The RSPB sees this policy as a parallel to 'Keepers of Time' by protecting the future of our priority open habitats alongside native and ancient woodland.

It is important to be clear that the policy applies to areas of former open habitat that have now been replaced by:

a. plantation conifers, with the aim of producing timber

b. early successional (secondary) woodland, due to a lack of management.

In these cases, the original soils have not been extensively altered beyond practical re-creation. Well established native woodland and ancient woodland are unsuitable for re-creation as soil conditions and vegetation communities are not suitable. The point at which a plantation or successional woodland has developed into a functioning woodland ecosystem and is thus beyond practical restoration will vary by situation, but can be judged through field assessment, for example vegetation type.

[16] RSPB Heathland Extent and Potential project, http://www.rspb.org.uk/ourwork/conservation/advice/heap.asp

No	Question.
6.	What do you think of our proposed outline definition of 'mature native woodland'?

We support this definition, for the specific purposes of this policy only.

The consultation acknowledges there may be 'exceptional circumstances'. It is important to define the 'exceptional circumstances' where open habitat under native woodland, that is over 80 years, should be re-created. For example, if potential open habitat that is considered critical for connectivity should be re-created.

We will expect practitioners to help local users to participate in development of the initial proposals

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

The RSPB supports high quality local participation in decision making.

Forestry Environmental Impact Assessment (EIA) and Felling Licensing are valuable and constructive processes for engaging stakeholders in any major habitat re-creation proposals. The EIA process takes on board significant issues that stakeholders raise. We have found this has been a positive process in our woodland expansion and open ground habitat re-creation projects across the UK. It also ensured that the design of the re-creation was sympathetic to, and enhanced, the wider landscape. We hope government continue to support the Forestry EIA process. We support option 4 ' We could contribute to helping practitioners deliver this element of policy, for example, developing best practice guidance'.

A joint Natural England and Forestry Commission England project to update the Forestry EIA and provide guidance on consulting local stakeholders is currently being completed by the RSPB and Footprint Ecology in Dorset[17]. The Forestry Commission should consider this guidance and the need for developing further good practice guidance on open ground habitat re-creation from forestry. This would build upon existing Forestry Commission EIA leaflets and Forest Guidelines on landscape, archaeology, soils and wildlife.

We would welcome involvement in production of good practice guidance for open habitat re-creation. The RSPB has been re-creating heathland from plantation forestry and scrub woodland for over 15 years, as part of developing our heathland nature reserve network. We have purposely acquired forestry plantations in Bedfordshire, Surrey and East Sussex to return them to heathland. This has given us good experience of high-quality engagement and addressing public concerns. For more information on our experiences and methods please see: http://www.rspb.org.uk/ourwork/conservation/managingreserves/habitats/restoringheather/engagingpublic/experience.asp

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?

The RSPB supports the need for prioritisation to maximise the delivery of national biodiversity targets at a regional level.

However, we do not agree with the example in the consultation, which suggests

[17] Alsbury, S., Day, J. & Liley, D. (2008). Updating The EIA For Tree Removal From Heathlands; Unpublished report for Natural England and the Forestry Commission, The RSPB, Sandy, Bedfordshire.

No	Question.

prioritisation based on existing woodland cover. If woodland cover is low in areas where open habitat re-creation is needed, then emphasis should be placed on native woodland planting, to ensure the protection and enhancement of priority species, habitats and designated sites. This should be undertaken sensitively, which includes keeping woodland expansion away from priority non-woodland habitats and key sites. The conditions needed for the re-creation of open habitats are only present on a limited number of sites/environments; we should not be limiting these opportunities by inappropriate retentions. Increasing the time these specific sites/conditions are under plantation forestry/successional woodland, because of a lack of regional woodland UKBAP target delivery, could lead to the conditions changing, which might prevent the re-creation of high quality sites and/or increased re-creation costs.

Re-creation should be prioritised where it will deliver the best outcomes for biodiversity and environmentally sustainable land management. Restoring areas of scarce and valued open habitats, particularly contiguous with existing habitat, will reverse historic fragmentation and increase resilience of these habitats and their dependant species to climate change; by buffering against encroachment and disturbance, providing space to develop robust populations of dependent species, and to enable species and human users to co-exist with relatively low impact. Sites that support priority species and have the following attributes should be prioritised:

- Reduces fragmentation by rejoining existing heathland fragments
- Expands existing heathland to a scale that a) reduces management costs b) makes grazing management viable and sustainable, c) reinstates landscape scale processes and cultural context d) accommodates recreational activity without disturbance to wildlife.

Re-creating open habitats with these attributes will help to meet UKBAP targets for habitat condition, expansion, and patch size and also associated species targets.

Re-creation of open habitats from lower yield class plantations, which have high potential for biodiversity, should be prioritised in the early stages of policy implementation. This should ensure a step change in open habitat re-creation, whilst encouraging monetary savings through reduced grant support for plantations of low economic value. It should facilitate the re-direction of timber production effort to higher yielding sites, whilst delivering government biodiversity commitments in the most sustainable areas.

Re-creation of areas lost to forestry and early successional woodland is likely to be a more cost effective way to meet government targets, compared to re-creation from other land uses, such as agriculture. Creating larger sites will also significantly reduce the costs of managing the existing fragmented resource, due to economies of scale. However, this does not mean that sites away from existing habitat should not be considered, because they could still deliver significant biodiversity and other public benefit in the right setting.

National guidance, from Natural England and Forestry Commission England, on prioritisation for biodiversity is needed to ensure a common approach is adopted throughout the public and private estate (including targeted administration of grant support). Some sites will be unsuitable for re-creation, due to small size, isolation or practicalities of future management. We would welcome involvement in the production of prioritisation guidance for open habitat re-creation.

We will apply a framework for evaluation to projects

No	Question.
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?

No. We do not support the desired outcomes proposed in the consultation or the framing of open habitat re-creation as a 'Problem'. The site level objectives should be given flexibility to address site-specific issues, not just the high level nationally defined desired outcomes.

We support a consistent approach to evaluating individual projects. Using common and agreed criteria to assess practicability and benefits together with a range of other considerations, such as the need to maintain landscape features and cater for the local community. It should be supported by method statements with timescales and a plan for post-restoration sustainable management.

There needs to be a monitoring and evaluation component to the programme in order to inform its development.

We would be keen to work with Natural England and Forestry Commission England on national guidance for open habitat re-creation, including management planning. This would help woodland owners meet requirements under the UK Woodland Assurance Standard for a 'Transition Plan' for open ground habitat re-creation. We support option 4 'We could contribute to helping practitioners deliver this element of policy, for example, develop guidance and offer funding' as a way to assist management planning.

Further information and advice on management planning for heathland re-creation and management can be found in the RSPBs: *A practical guide to the restoration and management of lowland heathland*[18]

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?

We support option 4 'We could contribute to helping practitioners deliver this element of policy, for example, develop guidance and offer funding' as a way to assist management planning (see question 9).

The Woodland Planning Grant and Woodland Management Grants of the English Woodland Grant Scheme should be used to help with site assessment, survey and management planning for open ground habitat re-creation to help deliver national biodiversity targets.

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?

The RSPB does not support an England scale threshold rate or limit for open ground habitat re-creation from forestry. This places an unnecessary burden on this type of habitat re-creation. We suggest a supportive approach is adopted, where the UK situation is reviewed after three years of policy implementation and addressed as necessary through improved support /encouragement for woodland establishment if needed (i.e. no direct link in terms of compensatory planting). All new woodland planting must be appropriately located, designed and managed to enhance biodiversity not

[18] Symes, N., Day, J. (2003) A practical guide to the restoration and management of lowland heathland. The RSPB, Sandy.

No	Question.
	damage it. As part of the three year review, the rate of open habitat re-creation should also be assessed and bolstered 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 rate or limit. Instead, targets should be set in line with government biodiversity commitments. See answer to question 11.
	Key variables **What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?**
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?
	The length of time needed to reach desired biodiversity benefits will vary from site to site and may take a long time to reach full potential. It would be possible to model the potential species responses to re-creation as a function of scale, open habitat type re-created, range distributions etc, based on occupancy levels on open habitat, such as heathland for which there is good evidence for a range of species. Monitoring and reporting the contribution to UKBAP habitat and species targets should indicate short term and long term biodiversity delivery. The RSPB monitors priority species on its reserve network, which indicate short-term changes. For example, since heathland re-creation from conifer plantation began at RSPB Farnham Heath in December 2004, the site has been successfully re-colonised by woodlark, nightjar and tree pipit (all UK BAP species), and a variety of priority heathland reptiles, invertebrates and plants have also benefitted.
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?
	Yes, best practice operational measures that minimise any unnecessary release of carbon should be adopted. This should include appropriate disposal of arisings, including timber lop and top, conservation of soil carbon, and means of re-activating peat degraded by forestry. This element could be built into guidance. The Forestry Commission & Forest Service Northern Ireland are about to consult on the revision of the UK Forestry Standard and the associated Forest Guidelines, including the new Climate Change Guidelines. The RSPB will be examining these national requirements for sustainable forest managements in that consultation. We will respond in detail at that stage.
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 and fuel in the calculations on carbon balance?
	The difference in green house gas flux rates between plantation forestry and open habitats are not straightforward. Defra and Forestry Commission England

No	Question.
	must take account of the independent review of forest carbon science[19] that Forestry Commission Great Britain (FC GB) has recently commissioned, and the recommendations of the FC Carbon Advisory Group[20]. Forestry policy is for sustainable multiple benefits including biodiversity, not purely carbon sequestration. We believe the biodiversity and climate change adaptation benefits outweigh any mitigation benefits of retaining plantations on priority open habitat.
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?
	There are both potential synergies and trade-offs between achievement of government biodiversity commitments and carbon emission objectives from land use and management. In this case, we argue that the biodiversity benefits of open habitat re-creation, including adaptation, are potentially large, while the climate change mitigation benefits of plantations are negligible, especially when compared with reductions of emissions from energy and transport. Globally, nationally and regionally the focus on biodiversity has been to reduce or stop loss by 2010, and this has to be part of any post 2010 biodiversity target. The government has committed to the protection and re-creation of priority open habitats through the England Biodiversity Strategy and UK BAP targets. Setting an ambitious and effective policy for open habitat re-creation will be an essential first step in meeting these challenges. **In climate change terms, this policy has much greater potential to help species adapt to climate change, through habitat re-creation.** Species such as Dartford Warbler may be lost from other parts of their range as a result of climate change. The UK is likely to become increasing important for this species as it moves north. If sufficient habitat is not provided for them in the UK, then there is a risk that species become the victims of the problem we all claim we are trying to solve. This example is likely to be mirrored by many other priority open habitat species. **We recognise the role of woodlands in helping species adapt to climate change, but this means a planned expansion of native woodlands in the right places, not retention of plantations in the wrong places.** As with all climate mitigation action, woodland management, creation, and restoration should be undertaken using the principles of sustainable development. This means appropriate spatial planning, so that woodland can find its place amongst the range of land uses, which will form part of a low-carbon, sustainable future for our natural environment. **We strongly believe that whilst carbon issues are important they do not outweigh the biodiversity benefits of open habitat re-creation.** The Forestry

[19] See: http://www.forestry.gov.uk/forestry/infd-6vjhul

[20] See: http://www.forestry.gov.uk/website/pdf.nsf/b591cb1aa3d9d9ac802570ec004f557d/5778638a3ffec3ee80257435003875e3/$FILE/Paper4.08-CarbonInitiatives.pdf

No	Question.
	Commission England appears to recognise this position in a paper presented to the DEFRA rural climate change forum[21]. The Forestry Commission GB & Forest Service Northern Ireland are about to consult on the revision of the UK Forestry Standard and the associated Forest Guidelines, including the new Climate Change Guidelines. The RSPB will be examining these national requirements for sustainable forest managements in that consultation. We do not believe that FCE should pre-empt that consultation.
	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?
	We do not support the 'dynamic attitude' to open habitat management that is promoted by Forestry Commission England in the consultation document. This approach seems to suggest retaining 30 – 60% tree/scrub cover on the open habitat. **One of the biggest modern day threats to lowland heathland is loss to successional woodland and scrub, and government policy should not exacerbate this threat.** It is important to distinguish between woodland cover on a site level and on the open habitat itself. Most proposals retain a high proportion of trees on a site level (on average 49% of predominantly closed canopy woodland), as shown in the summary evidence paper[22]. Retaining an additional 30 – 60 % on the potential open habitat itself is inappropriate. We may support the need for maintaining a small proportion of trees and scrub on some areas of certain open habitats, where it enhances the overall conservation of the biodiversity interests. However, this varies depending on the type of habitat, its location and the biodiversity interest. For many habitats, such as blanket and raised bog, this is wholly inappropriate, as the retention of trees will further damage the nature conservation interest and related hydrology. **Practitioners should be encouraged to maintain an appropriate balance of tree cover to maximise the biodiversity benefit**. In general, this should be **less than 15%** for lowland (dry) heathland sites (<10% wet heath), in line with common standards monitoring for favourable condition. **We believe that there is an opportunity for offsetting management costs by utilising existing arisings that are produced from managing successional open habitats, without the added burden of allowing further areas to scrub up, in line with the 'dynamic attitude' promoted in the consultation.**
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?

[21] 'Although GHG emissions are significant, they do not provide a *prime face* case that open habitat creation should not proceed' Broadmeadow, M. (2007).*Carbon Balance of Heathland Creation*. Paper to Defra Rural Climate Change Forum (RCCF) Meeting, 12 July 2007. See: http://www.defra.gov.uk/environment/climatechange/uk/agriculture/rccf/meetings.htm

[22] Restoration of open habitats from woods and forests in England: developing Government policy: evidence Dominic Driver 22 November 2008 http://www.forestry.gov.uk/pdf/eng-open-habs-evidence.pdf/$FILE/eng-open-habs-evidence.pdf

No	Question.

See question 17.

Re-creation of all priority UKBAP open habitats, including non designated sites, should be judged against UKBAP habitat definitions and favourable condition should be assessed using Common standards monitoring.

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?

Any impact on timber production can be offset if:

a. Plantations are felled at economic harvest age.

b. Other woodland creation is on better soils for tree growth and hence will give better yields of better quality timber

c. Timescales of restoration (40-60 yrs in total) will allow for other new plantings to mature, maintaining the flow of timber to markets.

Re-creating open habitats can significantly benefit local economies by:

1. Creating jobs for open habitat re-creation work.
2. Encouraging local expenditure from outside the area from the organisations involved, on equipment, materials and local services.
3. Creating jobs for ongoing management and visitor engagement.
4. Facilitating extensive economic grazing systems.
5. Providing areas to attract tourism and its associated economic benefits, for example the high levels of visitors associated with the Dorset heaths. Re-creating wildlife rich areas can also help extend the wildlife watching season, which is important for economies heavily dependent on summer season tourism.

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?

We do not support any of the three approaches outlined in the consultation, because:

6.3.1: This option inappropriately suggests delivery at a lower than current rate, and fails to address the key policy driver of biodiversity.

6.3.2: This option is about preserving open habitat potential under plantation forestry rather than re-creation. If prioritised areas are restocked, the cost of re-creation will increase as the soils and conditions needed for re-creation will be further degraded[23],

[23] R.F. Pywell, R.J. Pakeman, E.A. Allchin, N.A.D. Bourn, E.A. Warman, K.J. Walker (2002) The potential for lowland heath regeneration following plantation removal, Biological Conservation, 108, 247, 258

No	Question.

leading to the loss of Critical Natural Capital. The opportunity to meet government commitments for these open habitats from forestry is likely to be more economic than from other land uses, such as agriculture, and should be realised whilst still possible.

6.3.3: We do not support a threshold rate/limit of re-creation. See answer to question 11.

Suggesting policy options that would result in a reduction of re-creation is unhelpful and inappropriate given that this policy stems from government commitments in the England Biodiversity Strategy. We had expected to see a policy proposal to consult upon, or at least an option in line with 'Keepers of Time'[24], by providing a strategic, habitat focused approach to enhance open habitats alongside native woodlands, to secure net public benefit. We do not believe that priority open ground habitats should be treated significantly differently, as the options proposed suggest, to priority woodland or any other priority habitats. There is a strong presumption in government policy that favours the restoration of ancient woodland from plantations, it is time that such a presumption is extended to include priority open habitats including lowland heathland, raised bog, blanket bog, semi-natural grassland and coastal dune systems.

A habitat listed in Annex 1 of EC Directive 92/43/*EEC on the conservation of natural habitats and of wild fauna and flora,* as a habitat of Community interest[25]; or as a UKBAP priority habitat[26], should be considered a higher ecological priority than any that are not so listed, including plantation forestry.

The RSPB supports option six in the step 1 paper: Open habitat Critical natural capital

"We will support the restoration from woods and forests of critical natural capital that has been converted to woodland or forest from priority open habitats. Forest and woodland will play a significant role in restoring these habitats because the open habitat plant and animal communities have often survived and woods and forests tend to alter the soil and seedbank less than other land-uses. We will promote the conversion of woods and forests with these characteristics to open habitats through removal of recent regeneration or felling of plantations, normally at or near economic maturity. We will map the area of open habitat critical natural capital on a national basis, agree timed targets, and monitor progress towards restoration. We will redeploy resources if progress is not quick enough to deliver the targets on time.
This policy is likely to result in a large proportion of the potential open habitat under woods and forests eventually being restored. It has some commonality with Keepers of Time."

It should be emphasised that this policy does not represent a departure from the objective of increasing England's woodland cover, but is a recognition of the partially negative public interest legacy of past forestry policy and the opportunity that now exists to address it.

[24] Defra (2007) *England's Trees, Woods & Forests*. Department of Environment, Food & Rural Affairs, London.

[25] http://www.jncc.gov.uk/Publications/JNCC312/UK_habitat_list.asp

[26] http://www.ukbap.org.uk/habitats.aspx

No	Question.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?

The RSPB rejects the introduction of the concept of 'compensatory planting'.

Felling approval for projects that create areas for International, EU, UK or English priority species, priority habitats and designated sites, must not be conditional on additional afforestation or reafforesation.

This policy must not impede important biodiversity action.

The RSPB considers that the main climate change issue is reducing green house gas (GHG) emissions from society at source, rather than afforestation to mitigate a small proportion of England's GHG emissions. The RSPB does not accept that compensatory planting is an appropriate mechanism to increase woodland area for climate change mitigation reasons. Targeted grants for high quality woodland development and management should be strategically employed to help native woodland species and habitats adapt to climate change, instead of a project-based 'compensatory' planting approach.

The RSPB is supportive of the idea of having a clear policy statement on woodland removal, as this would assist the restoration of priority open ground habitats, and work for priority species. This would help deliver government's biodiversity commitments under the UK Biodiversity Action Plan, England Biodiversity Strategy, EU Birds and Habitats Directives, Ramsar Convention as well as the England's Trees, Woods & Forests. We would like to see this policy positively drive the development of open ground habitat networks.

This policy must ensure that there is a strategic approach to this matter across local authority planning departments, Forestry Commission England Conservancies and Forest Districts.

The RSPB fully supports the conservation and enhancement of England's native woodland resource, and is concerned about any losses of ancient and semi-natural woods, including restorable native woodland sites currently forestry plantations[27].

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. The questions are dominated by perceived problems with open habitat re-creation, which is likely to result in policy strong on mitigation but weak on delivery of the key drivers, "Government objectives for biodiversity and habitats are the principal drivers of the policy along with landscape and cultural heritage as secondary drivers"[28]. It is against these drivers that the policy should be assessed.

Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be

[27] 'PAWS' - Plantations on Ancient Woodland Sites.
[28] Forestry Commission (2008) Restoration of open habitats from woods and forests: Policy development step 1 of 9: fit progress to date into a policy cycle, www.forestry.gov.uk/england-openhabitats

No	Question.
	particularly welcome or unwelcome to you?

Through its grant funding and licensing operations, Forestry Commission England has the potential to support the re-creation of open habitats in a number of ways, principally:

On the public estate:

- **Restoring the majority of open habitat potential on the public forest estate and subsequently managing the land for open habitat interests** (see case study in 'Other comments' section). A disaggregated budget is important so that timber receipts do not dictate re-creation. FCE budgetary savings, through not replanting, could be re-directed to support the re-creation of priority open habitat.
- Promoting sympathetic neighbouring land-uses, for instance by buffering re-created open habitats to minimise seed drift from plantations and by supporting sympathetic management of that land.
- Monitoring and reporting on re-creation of priority open habitats.

Through its grant and regulatory functions:

- Facilitating and consenting relevant felling licence applications and forestry EIAs.
- Not offering grant support to restock land identified as a re-creation priority.
- Providing grant support to enable restoration, in particular where Environmental Stewardship funds are not available.

Natural England has a principle role to play in delivery. Notably:

- Helping to identify priority sites.
- Consenting relevant applications (eg. on appropriate SSSIs).
- Supporting appropriate applications [as consultees].
- Providing grant support
- Promoting sympathetic land-uses adjacent and near to restored open habitats.
- Removing trees from restorable open habitats on the estates they manage and subsequently providing sympathetic habitat management.

Major public landowners, such as the Ministry of Defence and Local Authorities, are also critical partners in supporting open habitat re-creation, including:

- Removing trees as appropriate from restorable open habitats on the estates they manage.
- Promoting sympathetic land-uses adjacent and near to restored open habitats.

Other comments

We welcome your input on any other aspect of this consultation.

Case Study: Forestry Commission England managed Rempstone estate

This case study demonstrates the need for an ambitious and effective policy using the justification for lowland heathland re-creation on the FCE managed Rempstone Estate. This strong rationale for open habitat re-creation is repeated across the public estate, highlighting its importance as a delivery mechanism.

Rempstone sits at the centre of a wider vision to restore an internationally significant sequence of semi-natural habitats from Lulworth to Studland in Dorset, and re-connect the habitat transitions from Poole Harbour and its marginal saltmarsh, reedbeds into mire

No	Question.

systems and wet heath through dry heath and up to the native woodlands and calcareous grasslands of the Purbeck Ridge.

The site presents an opportunity to link the internationally important Godlingston and Middlebere/Arne heaths. A wide range of rare and specialist wildlife would benefit from heathland re-creation at Rempstone, including Woodlark and Dartford warbler, both already present in small numbers, all six UK species of reptiles, including the rare heathland specialists sand lizard and smooth snake, a diverse range of endangered invertebrates such as the Purbeck Mason Wasp, ladybird spider, heath tiger beetle and heathland specialists such as the silver-studded blue butterfly and rare heathland plants such as Dorset heath, marsh clubmoss and coral necklace.

Visually, the large conifer blocks at Rempstone are prominent in the surrounding landscape, with their plantation edges following the straight lines of the leasehold boundary. The Dorset AONB Management Plan[29] describes them as *out of character with the surrounding landscape*.

Rempstone also has a rich archaeological heritage: it has 2 Scheduled and some 40 Non-Scheduled Ancient Monuments, indicating occupation of the site from pre-Roman times. Site preparation for conifer restocking is likely to further damage the significant non-scheduled archaeological resource within the forestry areas. Conversely, sensitive re-creation of the heathland landscape offers a major opportunity to restore and safeguard the site's historic features.

Timber production on Rempstone's nutrient poor soils is neither highly productive nor economically profitable[30]. Given the public 'goods' that re-creation to heathland would deliver in terms of landscape, biodiversity and recreation, we believe that the business case for re-planting Rempstone with conifers is highly questionable. In addition to the threat of red band needle blight to Corsican pine, and FC's current moratorium on its planting, the site is dissected by a series of wetland mires that are surrounded by wetter areas that are unsuitable for growing a timber crop.

Illustrative of the contradictory public policies of state intervention to grow timber on former heathland and to conserve biodiversity, land adjacent to FC's Rempstone activity receives DEFRA funding under countryside stewardship for heathland creation.

Some 550 – 600 ha of Rempstone Forest could be, and in our view should be, restored to heathland habitat. A second forestry cycle would make any subsequent heathland re-creation much harder, if not impossible. **This policy provides a prime opportunity for this and other public forests to play a fuller role in the delivery of biodiversity and other public benefits in the future.**

End

Please include the "information about you" form with your response.[31]

Please send your completed forms to:

Dominic Driver

[29] Dorset AONB Management Plan 2004-2009. A framework for the Future of the Dorset Area of Outstanding Natural Beauty. March 2004. Dorset AONB Partnership.

[30] The average timber yield across the site is approximately 10-12 cubic metres per hectare per annum. The return from this level of production is economically marginal.

[31] See www.forestry.gov.uk/england-openhabitats-consultation for a copy.

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By 17.00hrs, Friday 5 June 2009.