

# 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>	Norma Saunders
<b>Your organisation (if any):</b>	Sherwood Forest Trust
<b>Date:</b>	4 <sup>th</sup> June 2009

No	Question.
<b>The nature of the change</b>	
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>Yes. We are keen to see short term gain whilst ensuring work is targeted to appropriate locations. There must be sensitive ongoing management and flexibility to take up innovative future opportunities as they arise. Intervention should be as close to meeting HAP targets as possible, but balanced by the need for reforestation on suitable sites so that no net deforestation occurs overall. The latter may take time to deliver, given that it will require conversion of farmland, so it may be pragmatic to have the same area target but over a slightly longer timetable. The open habitat potential under plantation forestry 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. Sherwood Forest has great potential to contribute to the open habitats policy and existing habitat opportunity mapping work has highlighted this potential in line with LBAP targets for open habitats and species. This policy has a unique opportunity to maximise the realization of these targets in Sherwood Forest.</p> <p>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. Therefore there should either be a level between the middle and higher categories for the scale of change, or the higher level figure over a slightly longer period. It is impractical to set annual targets. We support the modest and achievable UK BAP UK targets for increasing the extent of lowland heathland by 9,150 ha by 2025 as the bare minimum whilst policy takes effect, but expect delivery to significantly increase and exceed this figure as implementation mechanisms are established.</p> <p>The Sherwood Forest Trust carried out a valuable research project, on behalf of Natural England, into the feasibility of felling substantial areas of pine, converting to open habitat.</p>

No	Question.
	<p>We concluded that creating a patchwork of interconnecting corridors of heathland was most appropriate for a short term result. The experience gained would lead us to support heathland and wetland creation potential within Sherwood Forest's conifer plantations along with the translocation of commercial timber forestry to farmland. However, conifer plantations are outlined in the LBAP with an assemblage of important associated wildlife so targeting and siting of open habitat should give consideration to retaining these features where most appropriate. Coniferous plantations will always be a feature in Sherwood and given this, best practice and a spatial strategy for conifer should run parallel to a policy for the creation of open habitats.</p>
<p><b>Desired outcomes</b></p>	
2.	<p>Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?</p>
	<p>There needs to be stronger emphasis on the need for biodiversity gain as an outcome, not just no net loss, as is implied in Outcome 1. Ditto, for the woodland biodiversity outcome, needs to be bolder, "not compromised" is too weak. There needs to be a robust approach to recognising that forestry will need to expand onto new land for productive forestry so as to restore open habitats and conserve ancient and mature woodlands/ensure CO2 sequestration/maintain a viable timber industry etc. This is part of an essential national debate on the balance between biodiversity conservation, forestry and farming which needs to be discussed in a progressive way so that all parties can reach a satisfactory outcome. It may be that a cultural change needs to be encouraged where there is a less distinct division between farming and forestry and that it is all seen as a part of a working landscape that also incorporates biodiversity into both. This will help to achieve the more permeable landscape that is required for species to be more robust to the effects of climate change through the ability to disperse.</p> <p>The Sherwood Aquifer is sensitive to changes in land management above, especially the effects of intensive agriculture. Extensive conifer plantations currently help protect the water course to some extent and the open habitats policy must tie in with Water Framework Directive issues, EMRA's Spongely Landscapes Policies. Robust landscape considerations and LBAP targets to reduce habitat fragmentation should be key priorities.</p>
<p><b>Measuring the success of the policy</b></p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
	<p>The ecological indicators should seek to work with LBAPs to ensure local evaluation of policy can be measured. Eg. Capturing data on rate and area of restoration and expansion of open habitats from woods and forests. Woodland biodiversity indicator should also include establishment of new native woodland as a positive output. At the moment the lack of direction and scale for all of the indicators makes it hard to judge how effectively they will actually monitor delivery. The possibilities for increased use of natural regeneration should be explored.</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.	<p>Do you agree that woodland and open habitats are potentially mutually beneficial?</p>

No	Question.
	Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?
	<p>The recognition of the importance of transitional habitats on a landscape scale is crucial and could help to gain support by spreading the message of a dynamic landscape that can respond to change. There is a biodiversity value to the ecotone between well established semi-natural woodland and open habitat that some specialist taxa needs, and that these can have great intrinsic landscape value. .</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>The group agrees with this principle. It is important to be clear that the policy applies to areas of former open habitat that have now been replaced by:</p> <ol style="list-style-type: none"> <li>a. plantation conifers, with the aim of producing timber</li> <li>b. early successional (secondary) woodland, due to a lack of management.</li> </ol> <p>In these cases, the original soils have not been extensively altered beyond practical restoration. 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.</p>
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	The Trust supports this definition, for the specific purposes of this policy only.
<p><b>We will expect practitioners to help local users to participate in development of the initial proposals</b></p>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
	<p>The Trust supports high quality local participation in decision making. This participation should be at the appropriate level utilising locally endorsed bodies to represent and support Regional and Local BAP targets at a site-based level. Where they exist these groups would be well placed to provide this participation through their collective expertise and informed overview of habitat potential at a local and site specific level. This local consultation, information exchange and education, is essential to enable empowerment and achieve realistic, sensitive and appropriate open habitat gain. There should be a combination of point 2 and 4 approaches.</p>
<p><b>We will promote mechanisms for prioritising woodland removal at a regional level</b></p>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
	The Trust supports the need for prioritisation to maximise the delivery of national biodiversity targets at a regional level. We agree that local considerations should be taken

No	Question.
	<p>into account but in the East Midlands woodland cover is very low against the national average and this should not create a barrier to the restoration of open habitats but in turn should be a lever to encourage the creation of new woodlands to replace those lost though restoration of open habitats.</p> <p>Local considerations must be taken into account to ensure maximum biodiversity gain, for example where unusual or characteristic assemblages of species are present that may need novel solutions. But this needs to be within a context of the need to meet UKBAP targets as a principal driver and within broadly consistent parameters across England, so that other local agendas do not disproportionately dictate the outcomes to the detriment of the overall policy aims. Local decision-making should be based on local biodiversity considerations. Eg. in Sherwood, where the heaths characteristically have scattered scrub and mature native trees and are often in a close mosaic with acid grassland and woodland, a different approach would be required in comparison to the south western heaths.</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>The site level objectives should be given flexibility to address site-specific issues, not just the high level nationally defined desired outcomes. The framework could be beneficially used on the public forest estate and by larger NGOs (with funding and support) but could be a disincentive to private landowners. If the evaluation framework shows the delivery is working on public sites, and we know that private landowners are working to the same guidance for delivery and management, it should not be necessary to evaluate every site, particularly if this takes resources away from delivery and prevents private schemes being taken forward. The Trust supports 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.</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>Clear guidance on carrying out the evaluation so that it is consistent between practitioners will be required, with a straightforward methodology that is not subjective. Funds to undertake the necessary monitoring work should be made available as part of the grant offer, if it is undertaken through EWGS, so again the methodology should be honed down to the absolute essentials so that it does not become disproportionate to delivery costs.</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>

No	Question.
	<p>The Trust is concerned that an England scale threshold rate could see inappropriate targets fed down to local level and an annual National threshold may be hard to deliver. . Local sensitivities and LBAP targets should be the driving force behind thresholds. Linking deforestation to open habitat creation is not helpful as it could reduce opportunities for creation.</p> <p>It may be more helpful to look at the net gain/loss situation on a longer timescale such as 5 years rather than annualised, as it will be hard to ensure that replacement planting proceeds at an equivalent rate for each scheme and some new forest creation sites may be very substantial but take time to come to fruition. It would not be helpful to try to force planting schemes into an exact 1 for 1 replacement in a close geographical location, as this may lead to poorer schemes that do not deliver the best for biodiversity and forestry. We would therefore suggest that 5 year assessments would be more helpful, combined with a requirement that new planting schemes should be within the same natural area as the deforestation. This should achieve a reasonable balance across landscape types.</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	<p>It should be higher but achieved through better incentives for new woodland planting so that there is an increase in the scale of open habitats and woodland in the landscape overall, in line with RSS8 policies on biodiversity in this Region. Strategic land-use planning is required to balance the needs of biodiversity, food, fuel and timber production in a coherent way, this currently does not occur, resulting in local decision-making in the absence of a wider structure for delivering these aspects of society's needs.</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.	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>It should be remembered that the length of time needed to reach desired biodiversity benefits will vary from site to site and may take longer term to reach full potential.</p> <p>It would be possible to model the potential species responses to restoration 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. An example would be the detailed records of nightjar and woodlark population changes in Sherwood in relation to forest management. Across England a wide variety of data exists that can be used to draw reasonable conclusions for setting restoration and expansion targets, which can be refined and updated as the evaluation of new schemes proceeds. If we wait until everything is 100% certain we will not make sufficient progress on delivery.</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?

No	Question.
	<p>Yes the Trust agrees. Best practice operational measures that minimise any unnecessary release of carbon should be adopted, although with the proviso that in a few exceptional circumstances local FC decision-makers may have to license derogations (but these would be within clear guidelines). Practices should be clearly described as a condition of grant and for all FC and FE staff so that they are consistently applied across the board.</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>The Trust agrees that it is correct and robust to look at all sources of carbon, as this type of calculation should be expected of other schemes increasingly in the future, such as built development. However, part of the calculation should include the savings in CO2 emissions from afforestation on agricultural land, as this will be a net saving of emissions as new woodlands will sequester carbon, whilst most agricultural operations produce net CO2 emissions.</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>The Trust recognises the role of woodlands in helping to mitigate climate change, but this means a planned expansion of native woodlands in the right places, not retention of plantations in the wrong places. More bold targets for new woodland creation across the landscape, on suitable sites, should help to achieve an acceptable balance between biodiversity and climate change priorities.</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 where success for all sites is based on assessments of condition as applied to SSSIs?</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>Restoration 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 (CSM). Targets for the condition of newly created non-SSSI habitat can be agreed locally, by deciding the intended floristic composition in conjunction with the structure and habitat features that are necessary for the target assemblages of fauna (which should be those known to be historically characteristic of the area and guided by the UKBAP). Rapid assessment methodologies can be agreed to enable straightforward cost effective monitoring. By using a multi-species approach, it is hoped that management would enable the development of a broad diversity of appropriate species, including BAP target species, in the hope of delivering a sustainable</p>	

No	Question.
	<p>assemblage in the long term. It may be appropriate to consider widening the remit of some SSSI management plans/condition assessments to accommodate important species, but for which the SSSI was not notified, as long as this is not to the detriment of the habitat/species for which it was notified. This may be particularly relevant for SSSIs that have been notified for many years, before the BAP process was embedded. Where possible, good practice and evidence-based management should be able to reconcile multiple species targets.</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>Increased tree removal would potentially increase jobs initially in these sectors, which would clearly be beneficial. A new woodland creation programme with a view to long term sustainable management, particularly of hardwoods, would be beneficial for both biodiversity and the timber industry alike.</p>	
<p><b>Different approaches to applying policy</b></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 either on a combination of these approaches or on new ideas?</p>
<p>An approach similar to 3 but with a greater commitment to replanting/ forest translocation on appropriate land so that the national limit is higher would be preferred.</p>	
<p><b>The role of compensatory planting</b></p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
<p></p>	
<p><b>Factors to consider when deciding which policy is likely to work best</b></p>	
22.	<p>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>
<p></p>	
<p><b>Implications for delivery mechanisms</b></p>	
23.	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>
<p>Re-creation of areas lost to forestry and early successional woodland is generally a more cost efficient way to meet government targets, compared to restoration from other land uses, such as agriculture. It is important to also remember that the restoration of priority open habitats adjacent to existing open habitat lowers management costs significantly, by increasing economies of scale. The delivery mechanisms will need to recognise the importance of Local Wildlife Sites in terms of the impacts of both deforestation and afforestation, this is quite straightforward but must not be forgotten. The issue of open access, if deforested land is reclassified as Open Country, has substantial implications, it</p>	

No	Question.
	<p>may be necessary to make the process simpler for controlling access at certain times of year or in certain areas, so that it can be ensured that sensitive fauna are not detrimentally affected. This aspect could also be a potential disincentive to private landowners, which could significant problems with uptake of open habitats schemes.</p>
	<p><b>Other comments</b></p> <p>We welcome your input on any other aspect of this consultation.</p>
	<p><b>1. There does not seem to be any meaningful consideration of the possibility of income from management of open habitats, rather than seeing this only as a very expensive option. It is certainly true that management of open habitat is often expensive, particularly on small, scattered sites, but linked larger areas should lead to economies of scale and possibilities for more sustainable management techniques such as through grazing.</b></p> <p><b>2. Many existing forests do not yet meet the Forestry Standard for 10% open habitats, this is an area that need to be included more obviously in this emerging policy, so that best use is made of rides, glades etc.</b></p> <p><b>3. It may be necessary to plan compensatory woodland creation across Natural Areas in terms of broad brush opportunity mapping to ensure that the optimal links are made with other habitat types and their priority areas for re-creation, so that woodland planting doesn't compromise the creation of other habitats that can only be established on a particular set of conditions or critical linkages between those habitats.</b></p>

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

**Please send your completed forms to:**

[Dominic Driver](#)

Senior Projects Officer | Policy and Programme Group | Forestry Commission England

620 Bristol Business Park | Coldharbour Lane | Bristol | BS16 1EJ

0117 906 6003 | 07779 627668 | [oh.consultation@forestry.gov.uk](mailto:oh.consultation@forestry.gov.uk)

Fax: 0117 931 2859

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

---

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