

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:	c/o Karyn Stander
Your organisation (if any):	Sherwood Habitats Strategy Group (comprising Nottinghamshire Wildlife Trust, Natural England, National Trust, Nottinghamshire County Council, Notts Biodiversity Action Group, Sherwood Forest Trust, National Farmers Union, Country Land & Business Association and Greenwood Community Forest Team)
Date:	28 May 2009

No	Question.
The nature of the change	
1.	Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?
<p>Yes. Intervention should be as close to meeting HAP targets as possible, bearing in mind that these are really minimum targets, but balanced by the need for native 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 such as 20 years. 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 realisation 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. It is therefore appropriate that the higher level target should be used, as a minimum, but possibly with a slightly longer delivery period to ensure that high quality schemes are undertaken. 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</p>	

No	Question.
	<p>minimum whilst policy takes effect, but expect delivery to significantly increase and exceed this figure as implementation mechanisms are established.</p>
<p>Desired outcomes</p>	
2.	<p>Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?</p>
<p>This is a reasonable starting point, but we would like to see a much 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, predominantly hardwood, 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. A more positive list of outcomes would included:</p> <p>Delivery of BAP targets</p> <ul style="list-style-type: none"> Development of ecological communities that are able to cope with threat Development of an environment adaptable to unknown climate change Delivery of landscape diversity Public enjoyment of species and habitats not represented in secondary woodland. 	
<p>Measuring the success of the policy</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.</p>	
<p>Policy proposals</p>	
<p>Elements present in the policy</p>	
<p>We will treat woodland and open habitats as potentially mutually beneficial</p>	
4.	<p>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>
<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</p>	

No	Question.
	<p>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. It is important, however, that the need to retain existing areas of high value open habitat, and to restore priority areas to open habitat, is not compromised by using transitional habitats as a means to achieve biodiversity gain across large landscapes.</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>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"> a. plantation conifers, with the aim of producing timber b. early successional (secondary) woodland, due to a lack of management. <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.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
	<p>The group supports this definition, for the specific purposes of this policy only.</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>The group supports high quality local participation in decision making. This participation should be at the appropriate level utilizing 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 is essential in order to achieve realistic, sensitive and appropriate open habitat gain. There should be a combination of point 2 and 4 approaches.</p>
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>
	<p>The group 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 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</p>

No	Question.
	<p>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>We will apply a framework for evaluation to projects</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 group 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>To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.</p>	
11.	<p>Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?</p>
	<p>It is important that there is no net deforestation overall, but an annual England-wide threshold rate may be hard to deliver and may compromise the delivery of open habitat restoration if it is too inflexibly applied. It may be more helpful to look at the net</p>

No	Question.
	<p>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.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
	<p>It should be higher to provide more potential for achieving open habitat restoration (see answer to Q 1) but this needs to be achieved through better incentives for new woodland planting so that there is a step change 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>Key variables</p> <p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
13.	<p>Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?</p>
	<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.	<p>Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the outline practices presented? How could we best ensure that such practices are adopted?</p>
	<p>Yes the group 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>

No	Question.
15.	Do you agree that it is appropriate to include impact on long-term average carbon store <i>and</i> loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?
	<p>The group 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. In addition, some open habitats, including heathland, are also efficient at storing carbon and this should be included in the calculations.</p>
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?
	<p>We recognise 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. It is also essential that the importance of a matrix of open, closed and transitional BAP habitats across the landscape is recognised as essential in order for species to adapt and/or move in response to climate change. This should be given due weight in this policy.</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.	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>If we are to achieve the necessary step change in biodiversity, we need to think on a landscape-scale (outside SSSIs), rather than just multiplying up what we do on a site by site basis. This means developing a dynamic habitat management approach which involves less micro-management but still achieves high biodiversity objectives, not least through the benefits of scale and connectivity. Trying to meet condition standards for non-SSSI land could compromise conversion of that land to open habitats by being too expensive. Large areas of structurally diverse habitats, with transitional habitat areas and complex mosaics, with SSSIs set within them as a core of colonisation for the areas around, have the potential for high biodiversity value. Within the whole, areas can be managed for particular, scarce species that require very specific conditions, but in the context of trying to meet the needs of a wider range of fauna, which can be accommodated within larger habitat areas. Such an approach could accommodate often conflicting needs, such as the requirements for some species for rotating clear-felled coups and for others to have continuous-cover forestry. A more dynamic landscape would have areas of permanent open habitat, woodland, scrub, patchy and temporary open habitat and wetlands in a complex mosaic, with a variety of scales.</p>
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

No	Question.
	you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?
	<p>Restoration of 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). These can be further refined by setting targets locally for the condition of newly created non-SSSI habitat, 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 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>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</p>	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
	<p>Increased tree removal would potentially increase jobs initially in these sectors, which would clearly be beneficial. This has been found independantly by a number of partner organisations within the group. 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>Different approaches to applying policy</p>	
20.	Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?
	<p>The group does not support any of the approaches as they currently stand. An approach similar to 3 but with a greater commitment to replanting on appropriate land so that the national limit is higher would be preferred.</p>
<p>The role of compensatory planting</p>	
21.	What is the appropriate role of compensatory planting in this policy?
	<p>Compensatory planting can have a valuable role, as discussed in previous questions, with the proviso that it should not be seen as an obstacle to open habitat creation and does not result in loss of opportunity for high quality open habitat to be created. The 5 year balancing approach across natural areas as described above would be an effective way to achieve biodiversity and other outcomes successfully.</p>
<p>Factors to consider when deciding which policy is likely to work best</p>	

No	Question.
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?
The question on long term viability should clarify that land management options should be flexible and cost effective, but still within agreed parameters to deliver biodiversity.	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
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 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.	
Other comments	
We welcome your input on any other aspect of this consultation.	
<p>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.</p> <p>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.</p> <p>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.</p>	

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

Please send your completed forms to:

[Dominic Driver](#)

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

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
Fax: 0117 931 2859

By 17.00hrs, Friday 5 June 2009.