

# 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>                  | Fran Lancaster                      |
| <b>Your organisation (if any):</b> | Shropshire Biodiversity Partnership |
| <b>Date:</b>                       | 4 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>From an LBAP point of view in an ideal world we would be able to deliver the UK HAP target although in practice this is often limited by resource availability. If the middle level of 1,100ha per year restoration could be achieved and the resulting open habitats sustainably managed that would be a considerable improvement on the current situation.</p> <p>The statement that 'Site by site it will rarely result in the removal of all woodland' is acceptable but only under the condition that the decision be made on a site by site basis, based on the merits of that site and using all the available data from the LBAP and local conservation organisations on what restoration strategy is most appropriate for the site. There will be some sites where removing the vast majority of the trees right for the habitat and FC policy must be flexible when local knowledge is available.</p> <p>Management costs following tree removal should also indicate whether income from the land such as sale of stock, has been included in the average figures produced.</p> <p>Information from national habitat mapping projects such as Landscapes for Living and the 50 Year Wetland Vision must be combined with local knowledge from habitat mapping and tagging projects to prioritise sites for restoration. Prioritisation must be in terms of importance of the site for biodiversity rather than the cheapest or least publicly controversial of sites for FC.</p> |
| <b>Desired outcomes</b>         |  |
| 2.                              | <p>Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?</p> <p>The list of desired outcomes should note that not all desirables are of equal value: Financial viability should not be considered a stopping point for restoration plans on</p>  |

| No   | Question.  |
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|  | <p>individual sites, it can be resolved through funding bids, grant schemes, partnership working etc. Projects do not have to be achieved in a single stroke. Work may be phased to accommodate the need to raise funds for each stage. Agri-environment schemes can be a major delivery mechanism for maintenance of the resulting open habitats.</p> <p>The Government Strategy for England's Trees, Woods and Forests (2007) makes reference to issues of carbon sequestration saying 'The scale of this sequestration is small in relation to England's total emissions of greenhouse gases although it is comparable to the contribution that can be made from other sectors. The Strategy therefore makes it clear that while such carbon storage is an important benefit, it is not the principal driver for tree planting or woodland creation.' In line with the Government Strategy on England's Trees, Woods and Forests it seems that reduction of carbon sequestration resource caused by resotation of woods to open habitats should not be 'the principle driver' for refusal of restoration plans.</p> <p>The outcome relating to timber sector activity seems a little protectionist towards bussineses linked to the timber industry. Earlier reference to management of open habitats being more finanically demanding suggests that these habitats are likely to support a greater number of jobs, just not necessarily in the timber sector.</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 set of indicators for evaluation is reasonable but again it should be noted that not all are of equal importance. The outcome 'ecological communities able to cope with threats' should be the primary indicator of success. Some of the other outcomes such as 'financial viability' are measures of how sustainably and efficiently the policy is being carried out but should not necessarily be seen as a measure of 'success' of the policy.</p> <p>We would suggest further investigation into the use of UKBAP species when measuring the success of the 'ecological communities able to cope with threats' outcome. Other indiators have been used on both a local and national level using more ecologically significant groups of species. UKBAP species should not be considered as indicators of the health of an ecosystem and were never listed as such. Indicators such as axiophytes (plant habitat indicators being used in many counties) or Ellenberg indicator values could be investigated.</p> <p>We would also suggest that an effective and cheap means of monitoring the success of biodiversity related outcomes, and communicating this to the biodiversity community and public, is the Biodiversity Action Reporting System (BARS). FC use BARS for national reporting only which means that achievements are currently hard to find.</p> <p>It might be useful for the 'woodland biodiversity' outcome to record the NVC type of woodland lost. Some are more valuable than others.</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? Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?</p>  |
| <p>We agree that woodland and open habitats are potentially mutually beneficial and that</p> |  |

| No  | Question.  |
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|   | <p>mosaics of habitats and woodland edge habitats are important. Woodland edge habitats are vital for some species of open habitats such a nightjar and the appropriate balance of habitat types should be sought for each site on an individual basis. It should also be recognised that woodland and open habitats are occasionally not mutually beneficial - particularly in upland areas.</p>  |
| <p><b>A presumption against removal of 'mature native woodland'</b></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>Ancient woodland sites should not be targetted for clearance felling if the species of tree are appropriate to the historical nature of the site. Ancient woodland sites which have been turned to plantation or colonised by non-native species should be priorities for restoration either through PAWS or through appropriate management schemes.</p> <p>'More recent but still relatively biodiverse native woodland' should not be targetted for removal if it is on an appropriate site. Non native species and plantation should be targetted in preference to any native species in an appropriate location.</p> <p>It is agreed that mature, native woodland should not be targetted for removal but please see comments on definition of 'mature woodland' below.</p>   |
| 6.  | <p>What do you think of our proposed outline definition of 'mature native woodland'?</p>   |
|   | <p>A single stock definition of 'mature native woodland' may not be appropriate for judging all proposed restoration schemes. Sites must be judged on their merits, the value of restoration and local and national BAP priorities rather than on a broadbrush rule which does not allow for local distinctiveness and rarity of habitat types.</p> <p>Relic peat bogs, mosses and mere sites require special attention and consideration, especially in Shropshire, Staffordshire and Cheshire, and it may not be appropriate to use an '80 year old' rule to define 'mature native woodland' on these sites. There are sites where mismanagement or the absence of management has allowed trees to become established over a reasonable period of time but these sites are still meres, mosses and peat bogs which could be restored to functioning natural habitats with high potential for storing carbon and which are identified as priorities for restoration by Landscapes for Living, the Wetland Vision and by local BAP priority mapping.</p> <p>In some cases there is a disagreement between conservation organisations and members of the public over how long trees have been established on a site. Resolving these issues on individual sites would not be helped if FC adopt a general rule that any trees over 80 years old are 'mature woodland'.</p> <p>The phrase "wooded for the last 80 years" could use a little clarification. What definition of 'wooded' is being used?</p> <p>We are concerned that the last bullet point (top of page 24) regarding sites which have been closed canopy for the last 20 years, but with some older stock, may exclude restoration of former parkland sites that have become surrounded by younger trees of a little over 20 years old.</p> |
| <p><b>We will expect practitioners to help local users to participate in development of the initial proposals</b></p> |  |

| No | Question.  |
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| 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 Shropshire Biodiversity Partnership strongly support the statement that 'participation is not simply about consulting on minor modifications to already developed proposals'. FC should apply this protocol to the development process of all its policy and each Forest Design Plan.</p> <p>The Shropshire Biodiversity Partnership feels that when the Forest Design Plan for Haughmond Hill was made available for consultation it was not issued to the LBAP with sufficient time available for a steering group response to be gathered. The plan was not available electronically which made sharing it with the numerous members of the steering group very difficult and time consuming. The deadline for the consultation was not made clear - the paper copy of the plan was finally provided to the LBAP biodiversity officer, Dan Wrench, when the consultation deadline was only a week away.</p> <p>The Shropshire Botanical Society, a member of the Shropshire Biodiversity Partnership, did submit comments on the Haughmond Hill Forest Design Plan to FC but received no response to their comments and in the final Forest Design Plan the scope to which these comments had influence the plan was not made clear. FC should respond clearly to comments and the final plan should more fully detail consideration of the comments received.</p> <p>LBAPs and local recording groups hold a large amount of species and habitat data and local knowledge which should feed into consultations and should be strongly reflected in FC policy. Policy must be flexible on a site by site basis and FC must be willing to be influenced by local knowledge.</p> <p>A wide range of local, regional and national mapping projects are available which should be used by FC to inform specific Forest Design Plans. Such project include Landscapes for Living, The 50 Year Wetland Vision, Natural England Habitat Inventories and also local mapping and targetting techniques such as axiophyte mapping (worthy plants) and Woodland Opportunity mapping available in Shropshire.</p> <p>If FC insists on a broadbrush, standardised approach across all sites nationally then local distinctiveness and diversity will be lost and a large number of locally and nationally important sites will not receive the specialised, data driven, taylorred management which they require.</p> <p>Option 1 would be preferable and would allow LBAPs and local recording groups to feed into FC policy at an early stage. Consultation on site plans should occur begin as early as possible, certainly before the draft plan is finished, so that the valuable information available from local sources can feed into and improve site plans.</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?   |
|    | <p>Prioritisation at a regional and local level is vital since a national, broadbrush policy is not appropriate when woodland sites, their history, management requirements, ownership, geology and landscape character vary so widely across the UK. Prioritisation should always use local data and sites should be individually assessed on their merits using the best information and taking into account local BAP habitat priorities.</p>   |

| No  | Question.  |
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| <b>We will apply a framework for evaluation to projects</b>   |  |
| 9.  | Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?   |
| <p>FC should apply a framework not only to projects put forward by other organisations but also to all FC work and policy.</p> <p>Desired outcomes should be a balanced view between biodiversity requirements, some social and public access requirements and landscape character impacts.</p> <p>The Framework should have capacity for regional and local targetting and mapping resources to feed in early in the process, before the desired outcomes are established. Landscapes for Living mapping and national and local BAP priorities should be the most significant drivers when establishing the desired outcome for a site. Desired outcomes should be represented in the LBAP and outcomes reported on BARS.</p> <p>The framework should also be influenced by national, regional and local landscape scale habitat projects which are occurring in the area which are driven by national and local BAP priorities. FC should be willing to engage in the development of local landscape scale projects and to be an active partner in facilitating delivery.</p> <p>A framework should be applied under either option 1 (imposed) or option 2 (a condition of funding).</p> <p>Assessment of 'long term impact / was it worth it' should be basic elements to improve the process in the future.</p> |  |
| 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?                                      |
| <p>Practitioners should be given support and guidance throughout the framework process and should be made aware of the resources available to them in local BAP partnerships and conservation organisations.</p> <p>Practitioners should be given support regionally and nationally to use the framework - there must be opportunities for FC and local practitioners to learn from experiences on other sites and to improve the process.</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>  |  |
| 11.   | Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy? |
| <p>If it is necessary to have a threshold for woodland removal then projects should be carried out based on a priority basis - priorities should be decided through consultation with local stakeholders - NE, wildlife trust, LBAP, RSPB, local wildlife recording groups etc. Compensatory planting should not be required.</p>   |  |
| 12.   | Do you consider that the proposed threshold is about right, too high or too low?   |

| No   | Question.   |
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| <p><b>Key variables</b></p> <p><b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b></p>  |   |
| 13.  | <p>Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?</p>  |
| <p>An axiophytes or worthy plants approach would allow estimation of the improvement in biodiversity on sites which are under restoration. Axiophytes can be divided into indicators of good quality examples of specific habitats, eg. heathland or dry acid grassland, and can be used as a year on year measure of change. Axiophytes are judged to be a reasonable indicator of biodiversity on specific habitats ie a heathland site with a high number of heathland axiophytes is likely to also have a high number of other heathland specific species.</p> <p>It is essential to discuss the biodiversity objectives, and how to measure these, through the LBAP process.</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>It is generally agreed that minimising carbon emissions should be a consideration but some of the outline practices depend very much on what is appropriate for the individual site - ie not removing stumps or minimising soil disturbance may not be appropriate on all sites. Decisions should be balanced with what is appropriate for the site rather than a broad brush policy.</p> <p>We agree that arisings should not be burnt in the traditional sense but the creation of biochar should be considered as an effective long term store of this carbon.</p> <p>As above in question 2 above The Government Strategy for England's Trees, Woods and Forests (2007) makes reference to carbon sequestration saying 'The scale of this sequestration is small in relation to England's total emissions of greenhouse gases although it is comparable to the contribution that can be made from other sectors. The Strategy therefore makes it clear that while such carbon storage is an important benefit, it is not the principal driver for tree planting or woodland creation.' Carbon sequestration should not be used as 'the principle driver' for refusal of restoration plans or aspects of them. Decisions should be based on what is of most ecological value for restoration of a functioning and sustainable ecosystem.</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>Long term carbon storage calculations should take into account the carbon storage ability of the specific habitats being restored ie. peat bogs once fully functioning may have a higher carbon storage capacity than woodland. This does not seem to be considered in the calculations presented.</p>  |   |

| No   | Question.   |
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|  | <p>Carbon storage of woodland contributes a low figure to national total carbon storage totals and should not alone be the overriding factor in making decisions on any site.</p> <p>During all resoration activites it should be standard of working that timber product is used as wood fuel or in another useful way rather than simply disposed of as waste. This may not always be financially viable.</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>Table 4 acknowledges in the carbon balance section that under the possible range of woodland removal 'this is a maximum negative impact on England's total carbon emissions of 0.1%.' Biodiversity improvement must be the driving forces in restoration schemes though the work should be carried out in a way which limits, so far as practicable, the carbon released into the atmosphere.</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>   |
| <p>It may be that on non SSSI sites a more dynamic approach could work if it is appropriate to the open habitats on the site and the species which use the site. Some species benefit from mosaics of habitats and this kind of management in coppice systems allows financially viable product to be produced while maintaining open habitats across sites.</p> <p>Decisions on what kind of management is favourable should be made on a site by site basis and FC policy needs to be flexible enough to allow for variation in what constitutes 'appropriate management' for a specific site.</p> |   |
| 18.  | <p>If so, how might such an approach be developed? Is there scope for modifying the conservation objectives on some SSSIs to incorporate a similar approach? If not, do you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?</p>  |
|  |   |
| <p><b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b></p>   |   |
| 19.  | <p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>   |
|  |   |
| <p><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>   |

| No  | Question.   |
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|   | <p>Approach 2 should be the priority 'Realising wildlife value of potential open habitat under woods and forests' but inevitably an aspect of approach 1 'making sure that the land can be managed in the long-term' is necessary to make restoration worthwhile and sustainable into the future. Long term management must be an aspect of any restoration plan which is put together.</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>Some compensatory planting may be possible depending on the nature of the scheme. To demand full compensatory planting in the case of landscape scale projects being carried out by conservation organisations would be impractical; the necessary land purchase would make the work prohibitively expensive for charitable conservation organisations.</p> <p>Any compensatory planting should be in appropriate locations agreed with the LBAP and should be of native broadleaved species. No compensatory planting should be mandatory since there will be projects for which it is not appropriate.</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>FC targets and government targets need to acknowledge the importance of UK BAP habitat targets. FC policy and procedures need to recognise, and be open to, the importance of local knowledge which can be provided by statutory organisations, LBAP partnerships, wildlife trusts, local wildlife recording groups etc. It should be accepted that these groups know the sites and should be heavily involved in developing the vision for a site and seeing it through.</p>  |   |
| <p><b>Other comments</b></p>  |   |
| <p>We welcome your input on any other aspect of this consultation.</p>  |   |
| <p></p>   |   |

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

**Please send your completed forms to:**

[Dominic Driver](#)

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

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