

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:	Phil Tidey
Your organisation (if any):	Small Woods Association
Date:	010609

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>We would support an intervention at the bottom end of your range of options. The increasing demand for woodfuel indicates that we should be looking to plant more woodland to meet this need and it is precisely these unmanaged woodlands that you are considering removing that should be brought into management to meet this need, rather than advocating the removal of unmanaged woodlands as having no impact on the local economy. You also flag up the negative impact of this policy on carbon balance; any actions that will result in a net increase in carbon emissions need to be considered carefully.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>The list of outcomes is reasonable but should be amended somewhat. You state that the key driver is a desire to improve open habitat resilience in response to climate change. You need to consider carefully how sustainable some such habitats are in just the same way as we are reassessing planting guidance to take account of changes. Flexibility and imaginative thinking could help provide a greater level of sustainability - for example grant funded birch clearance could be replaced under some circumstances with management for woodfuel if areas are managed in rotation.</p> <p>Outcome 2 deals with the financial implications of this policy. You do not seem to take account of the opportunity cost of the policy - the income foregone by removing recent native woodland or young conifer plantation, which can be expected to rise with the developing woodfuel market.</p> <p>Outcome 3 only mentions the need to avoid deforestation - we should be looking for a net</p>	

No	Question.
	<p>increase in woodland cover for the reasons outlined in 1 above.</p> <p>Outcome 4 Woodland has the potential to support a wider range of recreation activities than open habitats. This is especially true of recent woodland of limited biodiversity value. Local communities should be consulted at all stages.</p> <p>Outcome 5 Carbon balance. This says only that woodlands make an appropriate contribution (whatever that means) to the carbon balance. We should be looking to managing our woodlands in such a way that they make an increasingly positive contribution. Woodland products could provide a low carbon substitute for high carbon materials.</p> <p>Option 6 Timber sector activity. It might be that the plans might only have a small effect on this sector, but in terms of removing the potential for an increase in production, especially of woodfuel, the effect is far more serious. In addition by potentially targeting smaller rural woodlands you could reduce the potential for developing local markets and businesses.</p>
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?
	They seem reasonable, except for the public engagement outcome. Here you could include something like number of groups/individuals consulted.
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?
	Yes, but purely from a narrow biodiversity perspective
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'?
	Yes, but this should be expanded to include more recent native woodlands with the potential to yield a valuable timber or woodfuel crop.
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	Reasonable
We will expect practitioners to help local users to participate in development of the initial proposals	

No	Question.
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
You should expect a high degree of local consultation, especially where there has been significant formal or informal access.	
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?
Prioritisation should be at a more local level.	
We will apply a framework for evaluation to projects	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?
You should impose the framework as a condition of funding.	
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?
You should offer training workshops to ensure uniform application of the framework	
To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.	
11.	Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?
The threshold should be applied on a regional basis. For the reasons outlined above merely to ensure that there is no deforestation is insufficient - we should be looking to increase woodland cover and only remove woodland where the biodiversity enhancement case is overwhelming, and insist in local compensatory planting.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
See above	
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?
All environmental actions should be assessed for their impact on reducing greenhouse gas emissions, and that this should be a priority factor in decision making.	

No	Question.
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?
	I agree that carbon-emission minimising practices should be adopted, but as net carbon emissions are inevitable where open habitats are restored this should only be done where the biodiversity case is overwhelming.
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?
	Yes
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?
	As in 14 above we should only restore open habitats (thus creating carbon emissions) where the biodiversity case is very strong.
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?
	Yes
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?
	Management objectives will have to become less rigid to deal with climate change.
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?
	See EFIP report
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

No	Question.
	either on a combination of these approaches or on new ideas?
	We would favour 1but recognise in some cases the biodiversity case would be very strong.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	It is to provide alternative future sources of woodfuel and timber, as well as future woodland habitat and woodland recreation sites.
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?
	Reasonable as they stand
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	No
Other comments	
	We welcome your input on any other aspect of this consultation.

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

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.

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