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:	Stephanie Wickison
Your organisation (if any):	Staffordshire County Council
Date:	5/6/09

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?

Landscape

In Section 4.1, Nature of Change, there is great variation in the projected removal of woodland to open space, between 5,600 and 30,000 ha per year, outlined in table 2. The aspirations for the scale of woodland clearance should be informed by national or local Landscape Character Assessment and/or forest plans based on woodland design guidelines. Significant change in the landscape is addressed in table 6, under ETWF theme “Quality of life and landscape”. It is important that the process is handled appropriately to ensure good design throughout the process and that significant negative landscape impact does not occur. Reference to forest design guidelines and forest plans, together with expertise that exists within the Forestry Commission should ensure that wooded landscapes are not cleared to result in poorly designed mxed landscapes. Local Landscape Character Assessments are available throughout much of the country to provide additional guidance on landscape character to inform the process.

Ecology

This policy should support other key government policy, such as that relating to achieving UK Biodiversity Action Plan (BAP) targets; as an example, this includes a long-term aim to double the current area of lowland heath through its re-creation on former areas of heathland (55,000 ha). Much of this is currently under plantation forestry, and it is here where most gain could be made, although there are also significant areas of secondary/successional woodland developed on former heath and other open habitats where tree removal would be worthwhile to address fragmentation issues and reduction in patch size.

Appropriate national targets might best be identified by a “bottom-up” process derived from regional targets for Biodiversity Action Plan habitat restoration and expansion associated with Regional Spatial Strategies, taking into account woodland habitat targets

No	Question.

as well as those for open habitats.

This could be supported by survey information, identifying habitat potential and by the process of biodiversity opportunity mapping, currently being carried out in some parts of the country, e.g. the West Midlands, to support land use planning. This process identifies the priority locations for restoration and creation of BAP priority habitats, including open habitats and woodland, to enhance and create ecological networks and aid in climate change resilience.

Consideration should also be given to including removal of woodland or plantation forestry adjacent to important open habitats where seed-rain makes achieving and maintaining favourable condition costly and difficult.

In terms of costs of the policy, calculations should consider the role of EU funding, such as Environmental Stewardship and grant funding such as Life +, plus the role of the voluntary sector such as the Wildlife Trusts and national conservation organisations that bring in non-public funding.

It may be appropriate to establish short, medium and long term targets for tree removal for open habitat restoration based on open habitat priorities and the age and condition of the forest estate and potential for compensatory planting at the strategic level.

Forestry

FC's aspiration to address open habitat restoration and expansion has to be achieved in a way that is apprpriate to the local landscape and how the woodland within it is valued. This value could be visual, ecological or social. The vast diffirences in the scale of conversion (Table 2) is surprisingly variable, however this reflects the need to address issues at a local level rather than deciding on a figure that is an average over all of England and then dividing it between Regions. Regional targets appear to be the most apprpriate way to come to a consensus of appropriate conversion rates. This must reflect the priorities of either restoration or open habitat expansion to ensure that retained woodlands are not left fragmented or vulnerable to climate change, due to changes in climatic conditions such as winds, rain or soil erosion. The retained woodland on site must also be of a size which will ensure that it can be managed sustainably in the future, if the size of the woodland is greatly reduced and the economic value of the timber removed, potentially these woodlands could be neglected and become the unmanaged woodlands of the future.

Desired outcomes

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

Landscape

Section 5.1, Desired Outcomes, does not include landscape improvement /enhancement within the list of outcomes that it suggests will be delivered by the policy. Where early forestry planting is identified as being badly designed, or other woodland needs more sympathetic re-design at a particular stage in its development, this policy could provide the impetus for addressing these design issues as well as delivering other benefits.

Ecology

The suggested outcomes do not appear balanced regarding the key drivers of the policy. As the policy focus is Government objectives for biodiversity and habitats in terms of restoration of open habitats, a greater emphasis on outcomes for these habitats might be more appropriate, such as:

- ecologically robust open habitats re-created where long term and sustainable

No	Question.
	management practice is in place; • significant contributions to UK Biodiversity Action Plan targets for restoration and creation of open habitats • declines reversed in populations of important open habitat species; • people's quality of life improved by creating more attractive and ecologically diverse landscapes; • people reconnected to their cultural heritage by encouraging learning about the history of the landscape and the role their ancestors played in it. Forestry It is vital that the Financial viability of the new landscape is a consideration to change. Constant inputs of Government funds to manage unsustainable habitats is not viable in the long term.
	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?
	Landscape The same indicators as identified for the desired outcome - Positive engagement by local and other users, could be used for landscape improvement, i.e. EIA indicating poor design. (table 5 - Proposed indicators). Ecology The balance of indicators is not well related to the focus of the policy on open habitat restoration. The suggested ecological indicators appear appropriate, though the following would be useful to help measure contributions to Government policy and BAP targets: • Progress towards UK Biodiversity Action Plan targets for restoration of open habitats; • Levels of populations of priority open habitat species; In terms of the woodland cover indicator, for alignment with Government policy, a useful distinction could be made between native broad-leaved woodland and non-native plantation cover. In terms of indicators of positive engagement by users, these indicators appear to express negative engagement rather than positive and require revision. The third indicator would be more balanced if it referred to all relevant community/conservation groups rather than woodland groups only. In terms of public consultation, experience in consulting on restoration of lowland heathland from woodland and plantation forestry in Staffordshire has shown the importance of provision of information and opportunities for discussion to allow an informed response. .
	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?

No	Question.
	Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?

Landscape

The implications of including landscape improvement in the desired outcomes are addressed comprehensively in the first proposed element in para. 6.1.1, "treating woodland and open habitats as mutually beneficial", where good design and appropriate landscape character would be integral to this element.

Ecology

At the strategic level native semi-natural open habitats and woodland are mutually beneficial. This may not always be the case at site level, however, and will depend on habitat types and local environmental conditions. This is a consultation about restoring priority open habitats to redress their decline and work towards UK BAP targets for these habitats. In the context, therefore, of secondary/recent woodland and open habitats, the two cannot in every case be viewed as mutually beneficial. Whilst the value of woodland edges, copses and scrub in open habitats is well understood, there are also negative implications of retaining these in terms of a greater management burden to sustain the open areas. Trees on raised bogs can damage the site's hydrology and nature conservation interest, and many heathland plants are not shade-tolerant. Control of species such as birch and pine on heathlands can incur significant cost/effort. Soil enrichment through woodland development is also potentially limiting open habitat restoration where these habitats depend on poorer soils. Secondary/ successional woodland can also lead to further fragmentation of open habitats and reduction in patch size, which may ultimately lead to loss of habitat viability as a functioning unit and local species extinction.

A clear distinction needs to be made between woodland types in promoting this idea. Several woodland types are UK Biodiversity Action Plan priorities and there is an acknowledged value, in the right place, of some developing woodland and scrub. This is not the case, however, for plantation woodland on, or adversely affecting, open habitats of biodiversity value.

Forestry

As in most cases it is at the interface of habitat change where many areas are most rich in biodiversity, therefore yes they are mutually beneficial, however it is also site specific and will depend on the species present within the woodland and open habitat. As with all habitat management the benefits are site specific and therefore I am unsure that a sweeping statement that they are mutually beneficial helps to ensure that all resoration or management addresses individual site conditions.

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'?

Ecology

Ancient woodland and other mature woodland may be distinctly different in composition and biodiversity. The requirement to protect ancient woodland is not questioned and this habitat is well protected by national and regional strategies and policies. Whilst it is important to be clear in this consultation that the policy is intended to apply primarily to areas of former open habitat that have been replaced by plantations and secondary woodland, there will be circumstances where small areas of woodland fragmenting key open habitats may provide more biodiversity benefits by their being removed – in part or in total. Such situations may not be exceptional, (e.g. where even-aged, single species

No	Question.

stands of woodland are present), although they may often not be of any scale. An assessment of such areas and the balance of overall biodiversity gains and losses through tree removal would help determine an appropriate course of action in such cases.

Forestry

Protection of Ancient woodland is satisfactorally covered through National legislation, therefore it is safe to say there is a presumption against removal of this habitat. However its presence on a site should ensure that other woodland removal, native or not, does not leave ancient woodland fragmented and vunerable to potential environmental and climatic change.

In regard to mature native woodland, there is no National, Regional or Planning legislation that protects this habitat therefore there is no presumption that it should be retained. However, the value of the mature native woodland must be assessed individually, to discover its ecological value, as well as its cultural and landscape value. There is a presumption that there will be no net loss in native broadleaf woodland, but that could involve removing an established native woodland and then replanting a more apprpriately located native woodland elsewhere. However the value of doing this can only be based once all the facts regarding the habitats value is known.

6.	What do you think of our proposed outline definition of 'mature native woodland'?

In general terms, this is acceptable, but as stated above, an assessment of woodland and surrounding habitats would indicate if there were good justifications for partial or complete removal. There may be circumstances where areas of native woodland 80 years or over, lying over open habitat could be removed or partially removed to restore a critical link between larger, but fragmented open habitat. 80 year old even-aged birch developed on former open land such as heathland or bog may be included in the definition of mature woodland, but may have low biodiversity value compared with other areas of well established woodland with a developed structure and ground flora.

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?

It is recognised that a thorough assessment of the impact of any major habitat restoration work, including taking account of the views of local people, is important to achieve successful delivery of this work. The responsibility for engaging such local people should lie with the landowner/manager, although it must be acknowledged that even with good quality consultation in place, consensus may not always be reached, whilst conservation objectives on key sites will remain a duty on the landowner. In such cases, policy should assist in moving the issue towards a resolution rather than simply halting progress.

This policy should aim to encourage good quality engagement to reduce the likelihood of problems arising and could consider a role in developing good practice guidelines on open habitat creation from forestry or woodland to assist landowners in this. The scale of stakeholder/public engagement should be related to project scale. The emphasis should be on informed consultation relating to the conservation objectives behind any project with an understanding that local participation be based on agreed criteria designed to avoid prejudice.

No	Question.
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?

Landscape and Forestry

Because landscape character has been mostly addressed at the sub-regional scale, as Regional Character Areas or through more local assessment (mainly at a County scale), prioritisation at the regional scale would be most appropriate, rather than trying, inappropriately, to meet national targets.

Ecology

There is value in prioritisation for delivery of national biodiversity targets at regional levels, but the consultation refers to prioritisation based on current woodland extent. Opportunities for priority open habitat creation to achieve national or regional BAP targets are not always present in areas of high woodland cover, whereas they may be in areas of low cover; in the latter case, opportunities for open habitat restoration should not be constrained by inappropriate retentions. Delaying restoration of open habitats over a longer period of time to avoid exceeding regional thresholds may make such restoration more difficult through increasing changes to soil chemistry or missed opportunities regarding funding streams to cover restoration costs.

Restoration should be prioritised where it is will achieve the best results for biodiversity, including reducing fragmentation and expanding existing open habitats. Furthermore, some land uses are more easily converted to valuable open habitats than others, such as forestry, whereas agricultural land can be significantly more difficult to convert to another BAP habitat.

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?

Although developing a consistent method – or framework – for guiding open habitat restoration is generally supported, the outcomes and indicators suggested in this policy against which each proposal should be weighed, require a greater focus on the policy driver of open habitat creation. The first step might be better described as the project or issue, rather than the negative connotation of "the problem". In addition, there may be specific site-based issues and objectives that should be considered and the framework should include the flexibility to allow for this.

A suitable framework for assessing each project should involve issues such as feasibility and sustainability, and measures to monitor successes and engagement with local users should also be in place. The Forestry Commission could have a role in this, as given in option 4, to help land managers by developing guidance and offering funding to assist in management planning work.

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?

As stated above, option 4 in this section would seem most appropriate. Practitioners would also want to refer to other specialist bodies for specific advice, e.g. Natural England, and in some cases English Heritage. However if it is to be an evaluation form, it must be simple and uncomplicated, without hidden areas of extra work.

No	Question.
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?
Setting such a threshold may limit opportunities to restore key UK BAP open habitats, therefore is not supported. Targets should be aligned with Government biodiversity commitments and UK, Regional and local BAP targets and not linked to relative proportions of proposed open habitat creation and existing woodland extent. Setting a threshold to maintain net woodland cover appears to assume that this policy will initiate a flood of new felling applications to restore open habitats in a short space of time, although there is no indication this will be the case. There is no reason to assume a dramatic rise in felling applications for open habitat restoration over a short period, therefore no current justification for a threshold to be set. Monitoring on a three to five year basis, could give clear indications of trends in woodland cover and appropriate responses, involving support of woodland establishment, could be developed accordingly.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
The concept of developing thresholds is not supported. Targets should be related to government policy and commitments including BAP habitat targets for woodland as well as open habitats.	
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?
Current evidence is available, from organisations such as the RSPB and Natural England, to demonstrate the benefits of restoration and expansion and reducing fragmentation on habitat viability and species populations and range, through monitoring of key open habitat species. While many benefits may require long-term assessment, due to the rate of ecological adaptation and colonisation, this existing data could be used to model potential species responses to restoration related to the scale of particular projects, type of habitat restored and species concerned. Furthermore, current reporting via BARS on UK BAP habitats and species should give a picture of short and longer term biodiversity achievements.	
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?
Management practices associated with the restoration or expansion of open habitats	

No	Question.
	should be positively encouraged to minimise carbon emissions. It is difficult, however, to be prescriptive about this and some of the suggestions included in the consultation demonstrate this. For small scale clearance of young successional scrub, carbon emissions may be greater through transportation of a chipper to a site, its removal to overnight storage facilities and then transportation of the woodchip waste to a suitable disposal facility, than through burning of brash in small controlled fires. Where open habitats are present and restoration involves removal of colonised trees, it may be preferable to remove these as early as possible (rather than leaving them to reach maturity) to reduce their impact on the habitat. Even where trees are quite widely spaced over open habitat, management of the open ground areas is likely to be more challenging and often therefore, more costly. This is not to say that there is no value in retaining long-established conifers on former open habitat of lower restoration priority so that the trees are removed once economically mature. Decisions in this regard should be considered, on a site by site basis with guidance from key agencies such a Natural England for statutory sites. Development of guidance, for site managers, regarding good practice for minimisation of carbon emissions might be useful. If open habitat restoration is agreed to be the best option then any costs associated with additonal works to minimise the carbon emissions (e.g. by alternative ways of dipsosing of brash such as whole tree harvesting) should be funded through HLS/FC.
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?
	There is still much debate about differences in carbon sequestration between plantation and open habitat that is sustainable managed; the role that soil and open habitats such as peat bogs certainly indicate there are other issues to consider, and carbon sequestration by woodland should not be considered in isolation. Although reduction in greenhouse emissions is a key issue and should be given due consideration in all activities, is it reasonable to suggest that Government open habitat restoration commitments should be set aside in favour of retaining woodland on the basis of its carbon capacity alone? Restoration of open habitats to address fragmentation and improve ecological networks is a key element of biodiversity adaptation to climate change and although carbon issues should be considered, they should not be made the focus of a case against open habitat restoration. Staffordshire County Council is actively involved in pursuing a wide range of initiatives to mitigate and reduce carbon emissions. Suggestions about retaining plantation and secondary woodland on open habitats as a way of mitigating against rises in greenhouse gas seems diversionary from the key issue of reducing emissions at source and the biodiversity and potential climatic benefits of restoring open habitat like peat bog and moorland. In terms of potential to substitute timber for higher carbon materials and fuel, this appears a separate issue that should be addressed through forestry and agricultural policy. The timber generated from restoration to open land is likely to be of variable character and only some may have potential for this use. Staffordshire County Council is developing a pilot small-scale energy generation facility that will utilise restoration arisings that are not suitable for large-scale energy generation. There may be potential for such small-scale facilities within the forest estate.
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

No	Question.
	make this judgement?

This question implies that the two activities must be in conflict rather than complementary. The balance should be made at the strategic, rather than site, scale.

A major thrust in UK policy on biodiversity in recent years has been to halt the loss of biodiversity by 2010 and beyond. This is reflected in the England Biodiversity Strategy. Open habitat restoration has significant potential to aid adaptation of species to climate change. Woodland clearly has a role in helping mitigate climate change but, as stated earlier, it should be in the 'right places', being managed sustainably and new woodland planting appropriately located.

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?

While use of SSSI condition assessment may not be appropriate in all circumstances, the ecological value of a habitat and the degree to which it can support biodiversity as a whole, and key species in particular, depends on habitat quality and the size of habitat patches. Therefore some means of condition assessment is essential. The suggested dynamic approach would retain some of the significant threats to open habitats such as lowland heathland and bog, namely, tree invasion. For most open habitats, succession to woodland has effects on soil chemistry, hydrology and species presence that are not easily or quickly reversed.

On the scale being proposed, a dynamic approach may not work in ecological terms and may result in an inefficient use of resources for habitat management. Permitting secondary woodland to develop on heathland or acidic grassland may encourage nutrient enrichment to these areas over time as well as shading out many light-demanding plants. Once felled, elevated soil nutrients and litter encourages bracken and scrub – more nutrient demanding species – to develop at the expense of heathland, which often takes longer to become established in such conditions. Land managers should be encouraged, where appropriate, to retain appropriate levels of trees, woodland and scrub on open sites but in such a way as to minimise management cost implications, and where these habitats are mutually beneficial in supporting and enhancing overall conservation of biodiversity.

In summary, the dynamic approach suggested is not supported. The overall balance of open habitats and woodland should be considered at the landscape scale, rather than the site scale.

There may be a case for statutory agencies working more closely with the Private sector to look at the Living Landscape issue. Currently large area projects are driven by voluntary organisations and Local Authorities, with reltively little support from statutory agencies. Greater joint working and funding which aims to idenitfy areas and encourage greater buy-in will help ensure the right outcome.

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?

See question 17 response. The restoration of UK BAP priority habitats should be undertaken in accordance with UK BAP habitat definitions and favourable condition should

No	Question.
	be related to Common Standards Monitoring. These systems have been established through specialist knowledge and understanding of habitat dynamics and provide the best guidance available to land managers.
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?
	The Forestry Commission commissioned a study on the impact of this policy on the forestry industry from the Forest Industries Partnership. This has indicated potential negative impacts to the industry from a reduction in woodland cover, but there may be options to offset this impact. An example is that plantations on wet heath and bog often gives poorer yield, whereas planned woodland planting on better soils would promote better growth and give higher yields. High quality woodland creation schemes based on a strategic, planned approach is preferable to piecemeal planting required as compensation for open habitat restoration projects. The former could be supported by grant aid and developed to ensure both biodiversity and commercial forestry interests are addressed. On page 18 of this document it is already acknowledged that "We do not fully understand the relationship between the reduction in timber production and timber sector business activity". Therefore we will all have to wait to find out what impact the FC find out.
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?
	There are issues in all three options given that are unsatisfactory in regard of meeting UK biodiversity objectives. The first (6.3.1) does not address the key policy driver of biodiversity. While sustainable management of restored land is important, achieving this should be driven by biodiversity priorities and not vice versa. The second option (6.3.2) seems to refer to the dynamic approach suggested in s. 6.2.2, (see response to question 17) and would not encourage a strategic approach to maintenance and enhancement of ecological networks and well-functioning ecosystems. The third approach (6.3.3) refers to a threshold, a limit on the amount of tree removal that can occur annually in order to safeguard timber stocks and to prevent the ability of woodland to sequester carbon. This is not supported for reasons given in responses to questions 1, 11, 12, 14, 15 and 16. Given that the development of this policy has arisen out of Government commitments to meet priority UK BAP open habitat targets, policy options that appear to be a deterrent to open habitat restoration should not be adopted. Priority open habitats should be given the same level of support and promotion as other priority habitats, such as ancient woodland.
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	Landscape Some of the ways it is suggested that the policy could apply, would be restrictive, for

No	Question.
	example compensatory planting close to woodland being lost would possibly run counter to potential for landscape improvement reflecting local character. Landscape implications may negatively influence this choice and planting like for like would be equally restrictive. Ecology Conditioned compensatory planting is not supported because it would impose an unreasonable burden on land managers who may not be in a position to offer this. Many organisations, including local authorities, support woodland creation and regeneration initiatives where they are able, such as Community Forests, but it is unreasonable to expect individual organisations or landowners to seek to undertake compensatory planting where a more strategically based plan could deliver better returns. It is unlikely that individual land managers or organisations could deliver compensatory planting in the most appropriate place or conditions for either biodiversity or timber industry benefit. Given the importance of restoration schemes for national or European priority habitats and species, it is not appropriate that these should be conditional on new planting. This could seriously impact upon the achievement of key Government BAP targets, and result in individual landowners failing to meet their obligations on designated sites. Furthermore, since it is recognised that current levels of woodland cover mitigate a small proportion of greenhouse gas emissions only, imposing a burden of compensatory planting on individual landowners to mitigate climate change is not considered to be appropriate, particularly if the imposition of such a policy is detrimental to other Government objectives, such as halting biodiversity losses. The concepts of developing clear policy on woodland removal and a strategic approach to enhancing England's woodland resource following the principle of "the right tree in the right place" would, however, be welcomed. A strategic approach should be based on BAP targets for the relevant region/administrative area. The process of biodiversity opportunity mapping, see question 1 response, could be used to identify the most appropriate areas for woodland expansion. Forestry The FC have to recognise that if woodland is to be removed then there will be a loss in overall woodland habitat, replacement planting should only be carried out if it is important within the landscape or to prevent woodland fragmentation. It is unfair to expect landowners to find alternative woodland planting sites on their land holdings, especially when they will have to find the resources to do so. The Forestry Commission must recognise that, although it is commendable to try and please all involved in this decision making, the objectives are to restore open habitat and in some landscapes that will result in the net loss of woodland.
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?
Landscape An additional question to ask in table 6, Section 6.4, would be whether the landscape quality is improved or landscape character strengthened as a result of applying policy decisions. Public funding is discussed in Section 6.5.1. There is currently, within HLS funding, an emphasis towards protected landscapes and existing designations e.g. SSSI improvement, based on Natural England objectives This may impact on the ability to deliver the outcomes of this initiative through existing funding mechanisms.	

No	Question.

Ecology

Similarly to the suggested indicators, the key policy drivers are not well represented in the questions proposed, see question 3 response.

Forestry

With the addition of the Landscape question, highlighted above, I believe it is a reasonable set of questions for those given, but note Ecology comment above. The key result of these questions must be "is it the right habitat in the right place" and long term is it the right land use within the landscape.

Implications for delivery mechanisms

23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?

Section 6.5.1: In our experience as land managers the current funding streams for woodland creation/management (EWGS) and open habitats (HLS) serve useful functions and since the concept of 'dynamic' land management – as proposed in this consultation – is not supported, there appears to be no real benefit in merging the two unless this could be done without blurring currently clear scheme objectives for biodiversity. Requiring that all open habitat restoration projects must be supported by HLS could result in a reduction of such projects and failure to make significant progress towards Government biodiversity targets and is not necessary as there are a range of other potential funding mechanisms.

There are other funding streams that could be relevant to open habitat restoration and subsequent management that contributes to BAP targets especially where creation or enhancement of ecological networks and biodiversity adaptation to climate change are involved. These include Natural England funding, the voluntary sector such as the RSPB and Wildlife Trusts, planning obligation funding, charitable trusts such as the Tubney foundation, the Heritage Lottery and European funding such as Life+. Additionally, Government agencies and departments and local authorities may consider this type of land management part of their statutory duty for biodiversity under the Natural Environment & Rural Communities Act 2006.

There are other mechanisms for implementation of woodland planting that could be explored. These would also bring community benefit and include woodland planting as part of Green Infrastructure creation and enhancement related to Growth Points, new settlements and other development and input into local authority Local Development Frameworks and Greenspace Strategies to promote woodland creation targets that would be funded by planning obligation developer contributions.

Strategic open habitat restoration and likewise woodland creation initiatives that were properly researched and supported would be more likely to attract this kind of funding and deliver substantial contributions to UK biodiversity and woodland cover objectives.

Open habitat restoration and woodland restoration management and creation can both be achieved through the planning and development control process and there are numerous examples of implementation. For example minerals and waste site restoration in Staffordshire delivers native woodland planting while woodland planting is also delivered by a range of residential and commercial developments as part of landscaping and open space provision. An issue may be that this contribution to BAP woodland management and creation targets is under-recorded as many planning authorities have not yet developed effective biodiversity reporting as part of Local Development Framework Annual Monitoring Reports and input to the UK Bap Biodiversity Action Reporting System (BARS) is incomplete. In Staffordshire, and nationally, projects are underway to address

No	Question.
	this reporting issue so that a better picture of conservation action can be achieved.
	Other comments We welcome your input on any other aspect of this consultation.
	The aim of this consultation is to enable participation of a wide range of stakeholders in development of Government policy on the restoration of priority open ground habitats from forestry and woodland in England. This policy is intended to help the Government meet UK Action Plan targets for these open ground habitats and the species associated with them. **Through this policy, opportunities for restoring significant areas of priority open habitats such as lowland heath and raised bogs over a period of time could be realised. Many of these existing habitats are of national or European conservation importance and for this reason, should be given high priority. The value of tree removal from formerly open priority habitats is acknowledged in the strategy for England's Trees, Woods and Forest (ETWF), one of its key principles being 'the right tree in the right place'. National and international obligations to safeguard the 'Critical Natural Capital' associated with priority open habitats should be regarded as inviolate, since we have a responsibility to safeguard them for future generations** **Woodlands – especially actively growing ones –play a part in mitigating climate change. This is not a reason, however, for retention where there could be significant open habitat benefits, but for planned expansion of native woodlands where there is not open habitat potential. Furthermore, the role other (open) habitats can play in carbon sequestration and storage should be considered alongside that of woodland. Most open land habitats depend on specific geological and soil conditions. This indicates that a strategic approach to open habitat restoration and woodland retention and compensatory planting, taking account of these factors, is needed.**

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

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

Fax: 0117 931 2859

By 17.00hrs, Friday 5 June 2009.

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