

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:	Nigel Symes
Your organisation (if any):	
Date:	

Summary

Thank you for the opportunity to input into this consultation. It is excellent that Forestry Commission are considering policy options to affect potentially large-scale restoration of open habitats from plantation forestry and successional woodland. I am however, concerned that the consultation documentation is excessively concerned with potential disbenefits of doing so, rather than presenting a balance of issues. The key reason for undertaking restoration is to conserve biodiversity, but I see no discussion of what that biodiversity is, its national and international importance, its present adverse conservation status, or threats into the future. Further the restoration of historic landscapes, and the cultural heritage that goes with that is paid only the briefest of attention.

The documentation only relates to a short to medium term and gives no space to the concept of delivering the whole potential over a long timescale, eg a full forest cycle, and the advantages this would bring. This would optimise timber and woodfuel from the restoration, and the facilitate the capacity to develop other woodland elsewhere through govt incentives that would provide for woodland biodiversity (that is not delivered by recent plantations on poor soils), and improved yields of high grade timber.

Although trees clearly do have an important role in conserving carbon stocks, where appropriately managed, the documentation makes no obvious reference to the potential value of open habitats in this capacity. The biggest carbon store in the UK is in upland peat, yet this has been severely damaged over time, including by afforestation. Restoration and hydrological re-activation of upland bog, lowland raised bog and lowland wet heath and mire could be a significant step in restoring C stocks. Little or no reference is made to provision for species adaptation to climate change through restoring robust large scale habitats and increasing porosity of the landscape.

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>No. The timescales are wrong: delivery should be over the full plantation cycle, and, the full identified potential of 130,000 ha of open habitat from forestry plantation and secondary woodland.</p> <p>Although it is important to set short to medium targets, these must be set in the context of the complete picture, which is not limited to 30,000 ha.</p> <p>The full potential for open habitats should be properly assessed and not be chosen from arbitrarily selected information.</p> <p>Extending the scope of this policy to the full plantation management cycle will have the following advantages</p> <ul style="list-style-type: none"> • accurate forward planning • optimising timber yield and supply to markets • provide for new woodland creation elsewhere (not as compensatory requirement but through incentives) to maintain production supply • ensure post-harvest restoration is manageable <p>The scale of open habitats lost to 20thC plantation forestry and successional woodland is enormous. The scale of ambition at 130,000 ha will not replace what has been lost.</p> <p>Table 3 gives costs but these are not presented in any context other than the perceived burden on the taxpayer. Restoration of open habitats will be a public good (bio-diversity, landscape and cultural heritage), for which the taxpayer is willing to pay, regarding as better value than agricultural support. The cost of restoring lowland heathland based on the HLS rate would be £2.2m per year (55k ha over over 50 years at £200 /ann x 10 years); this is a very low cost compared with other ag-env payments.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>No.</p> <p>I would have thought the key desired outcome would be the delivery of UKBAP targets (and thereby adherence with government commitment to international treaty) for restoration of open habitats. This would have precedence. The ability to cope with threat will be very hard to define, and could be deemed to be a bare minimum provision. However, relatively recently extensive tracts of open habitats have been fragmented and seriously reduced in extent by plantation forestry, thus the outcome should go beyond bare minimum and take a positive role in restoring natural heritage in Britain.</p> <p>The importance of open habitats as historic and cultural heritage is missed.</p>	

No	Question.
	<p>Financial viability: it is fine, but nothing whatever to do with this process: the cost of maintaining open habitats is already calculated and is provided for through existing agri-environment. The scale at which open habitats could be restored could provide a more viable framework for offsetting management costs through opportunities for product sale eg premium meats, biomass etc.</p> <p>Govt commitment to woodland cover: this should be disassociated with this policy – it is entirely desirable but should be driven separately and not a constraint on delivering this policy.</p> <p>Carbon balance: needs to reference potential for improving C absorption by open habitats</p>
<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>No:</p> <p>Ecological: include delivery of BAP habitat targets</p> <p>Financial: irrelevant</p> <p>Woodland cover: must not be allied to this policy</p> <p>Positive engagement: in what way do these indicate anything? Don't see any relevance of woodland groups.</p> <p>Carbon: not sure what you are trying to measure with these? Must include all aspects including carbon budget of restored habitat and be comparative with what is being restored from (not a blanket figure for woodland)</p> <p>Timber sector: irrelevant assuming govt and FC will properly incentivise woodland creation elsewhere</p> <p>How do you intend to monitor these? Who will the onus be on?</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>[This is a misleading and ambiguous question, what is meant by mutual benefit?]</p> <p>No.</p> <p>Long established native woodland on appropriate soils are important for biodiversity and other benefits (eg wood products and recreation). Open habitats are also important for biodiversity, recreation and extensive agriculture. But they do not and should not conflict for space; recent woodland occupying open habitats is not compatible.</p> <p>One circumstance that could be determined as mutual, is ancient wood pasture, some of</p>	

No	Question.
	<p>which had a heathland or acidic grassland element, however, most of this (designated as AWI) is now high forest – which in itself is inappropriate.</p> <p>The ecotone between open habitats and long established native woodland is valuable for biodiversity and landscape, but is now rare as secondary woodland and plantation has intruded.</p> <p>The vast majority of restoration situations involve removing 20th C plantation forestry, whose bio-diversity value is in most part low.</p> <p>The premise that a mosaic of open habitat and woodland will aid climate change adaptation requires significant clarification. It may be the case for native woodland, but the juxtaposing of potentially invasive trees eg scots pine that are not readily managed by say grazing, will not help in anyway.</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>Ancient woodland; yes</p> <p>'mature' native woodland; in principle yes</p> <p>Ancient woodland that is proven (the AWI maps are based on sometimes weak evidence eg historic names) should not be removed. See also q4 above re wood pasture; the division between ancient woodland, wood pasture and 'open' habitat is often blurred but as such can be beneficial to biodiversity and historic landscapes.</p> <p>The determinant of 'mature' woodland should not be entirely based on an arbitrary date. Different soil, history and climatic conditions will affect the rate at which a wood matures. A better approach would be to use vegetation community (NVC) to determine this.</p>
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
	<p>Mature native woodland will have a woodland flora appropriate to that woodland community (as described by the National Vegetation Classification). The degree to which this has developed following planting or colonisation of the open habitat will depend on local circumstance and habitat type.</p> <p>There will be circumstances where a woodland has 'matured' in 80 years, and others will take longer, and hence will remain suitable for restoration to open habitats for longer. Each site should be assessed on its individual merits.</p> <p>Also, some areas over 80 years old may need to be restored to provide crucial de-fragmentation or for hydrological reasons.</p>
<p>We will expect practitioners to help local users to participate in development of</p>	

No	Question.
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?
Yes , in that the EIA process that already exists does this well.	
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?
No . Prioritisation needs to be determined by national criteria to ensure a common approach to decision making. Potential for restoration will then need to be assessed <u>locally</u> to ensure practicality and context	
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?
No . the framework is utterly opaque and meaningless. Instead there should be a nationally agreed set of criteria to judge each project by, and each project should have a worked up plan that demonstrates its practicability (including ongoing maintenance provision)	
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?
Develop with stakeholders, and publish guidance on the agreed criteria and plan preparation.	
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?
No To describe removal of 1 st generation conifer crop as deforestation is like describing ploughing and reseeded a short-term grass ley as destruction of ancient downland. The term deforestation is emotive in the context of global destruction of native forest on a massive scale. This policy development is about reinstating semi-natural habitats of great biodiversity value from ecologically poor plantations, and to a lesser degree immature successional woodland (resulting from abandonment of open habitats) Government and FC need to sufficiently incentivise woodland creation to accelerate growth in the extent of woodland cover (preferably of native species as is currently the case), but this should be unconnected with the restoration of priority open habitats.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
There should be <u>no</u> threshold!	
Key variables	

No	Question.
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?
<p>[This is a badly crafted and ambiguous question.]</p> <p>Yes</p> <p>It is possible to model the scale of benefit to biodiversity (within certain confidence limits). This has already been done for a number of taxa, including birds, using occupancy rates (not carrying capacity) and colonisation or dispersal distance. The effect of reinstating landscape scale units of open habitat could be modelled, and the impact on hydrology could also be predicted. The Centre for Ecology and Hydrology have expertise in these fields.</p>	
14.	Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the outline practices presented? How could we best ensure that such practices are adopted?
<p>Yes, with caveats:</p> <p>1 the process of restoration can result in carbon emissions: true and described best practice will help minimise this. However, you seem to assume that arisings will not have a value eg for biomass heat/power or finished timber products.</p> <p>[it should be noted that in many cases plantation forest management doesn't adhere to described best practice in eg retention of arisings, ripping of soils etc]</p> <p>2 one-off loss of carbon store: this may be the case in some situations, but you seem to ignore the potential benefit in restoring active peat (not just in upland bog) and wet heath, and reduction in loss via DOC through reversing forest drainage systems.</p> <p>3 Loss of C storage through appropriate use of timber: a) timber from restoration should have same use as from plantation forestry¹, b) this should not be treated in isolation from the new woodlands with better yield of better quality timber</p> <p>One way of ensuring adoption is to publish technical guidance and ensure FC restorations are exemplars of best practice</p>	
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>No. I do not believe that carbon balance calculations are appropriate to restoring historic and bio-diverse landscapes.</p> <p>It is however, essential that restoration is not treated in isolation; a totally objective assessment that compares carefully the long-term implications of restoration on carbon,</p>	

¹ note timber that goes to pulp that then goes into landfill or needs recycling in the short term (toilet rolls, newsprint, cardboard etc) is hardly sustainable

No	Question.
	<p>with that of ongoing rotational forestry (and succession to woodland). It should include reference to soil carbon stores, and the potential accumulation therein following restoration. (Note that heathland soils that store high levels of C are damaged when a plantation is established). Any comparative assessment should assess loss of DOC in drainage.</p> <p>The total impact you give needs context; a) it is equivalent to the CO₂ production of one smallish village, b) takes no account of the potential to accumulate carbon in the open habitat. Any assessment should look at the impact of restoration in the context of new woodland creation at a country scale; it is likely that new woodland on better soils will store more carbon through greater growth and utilisable value than will be removed in standing crops from poor open habitat soils.</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>This is a consultation about the restoration of historic and bio-diverse habitats of immense biological and cultural value, with UKBAP plans for their recovery, and some of which have global importance. Therefore the balance should be entirely with achieving biodiversity objectives (and additionally, cultural and heritage objectives).</p> <p>As a separate exercise it is worthwhile undertaking a comparative study of carbon balance. This should be very inclusive of the range of issues, including the capacity of restored habitats² to absorb and retain C, and be in the context of the expanding woodland cover in England, and the relative C storage capacity of rotational forestry on poor soils and native woodland on better soils and higher yielding crop trees grown on better soils.</p> <p>It should also be set in the context of the scale of industrial, power generating, transport, agricultural and domestic emissions in this country: it is hugely more effective to reduce emissions than to try and capture them!</p> <p>You make a case that public perception is that trees are good for climate, but this is perception ignores a) the role of poorly managed forests as a carbon source and b) the benefits of peat and other semi-natural habitats in storing C.</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	<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>No – they should be restored to favourable condition</p> <p>Prior to the extensive loss of open habitats to plantation forestry in 20th C, these habitats were of a significant scale that supported viable and self sustaining populations of the full</p>

² not just upland peat habitats!

No	Question.
	<p>range of dependent biodiversity. They should be restored as completely as soil conditions allow, and not be compromised by intruded tree retentions.</p> <p>A proportion of tree and scrub cover has been a feature of heathland and downland landscapes for centuries, and a presence of native scrub, individual and clumps of trees is beneficial. SSSIs are representative; other surviving and potential open habitats could and should be brought to the same quality, not compromised. The limits set by JNCC common standards for favourable condition of SSSIs should be used to set limits for retentions in restored habitats</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>No, there should be no scope for “dynamic approach”, hence No, it should not be applied to open habitat SSSIs either: JNCC set the standards for SSSI condition, not Forestry Commission, and the Government’s UK BAP describes open habitats regardless of SSSI condition, and sets targets for their conservation</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.	<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>I think this is a loaded and poorly presented question.</p> <p>If FCE secures and uses grants for woodland creation appropriately, the scale of new planting of better yielding higher value timber should easily offset any reduction of timber supply through open habitat restoration.</p> <p>It would be sensible to plan and deliver the restoration programme over the full forest cycle to ensure that timber potential is broadly realised, whilst at the same time new plantings will if incentives are appropriate outstrip the restoration programme.</p>	
<p>Different approaches to applying policy</p>	
20.	<p>Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?</p>
<p>None:</p> <p>1 The bigger the scale of restored habitat the lower the unit cost of management (non-linear scale; see elsewhere), and makes no acknowledgment of the non-fiscal economic benefits of large scale open habitat.</p> <p>2 There should be a presumption that all 20th C plantation and successional woodland is appropriate to restoration (ie not management to provide elements of open habitat), without condition of compensatory planting (see below); you should assess the true extent of this and review this option.</p>	

No	Question.
	<p>3 the constraint of 1100ha is arbitrary and based on very short-term data, and the restoration should not be linked to it.</p> <p>The restoration of open habitats of national and international biodiversity importance should not be constrained by under-incentivised woodland creation. The full potential should be accurately assessed and mapped, and any constraints on delivering it overlain and justified.</p>
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
	<p>None – Compensatory planting is a term that implies that restoration is conditional on the planting of an equal area by the restorer. This is not appropriate! New woodland creation has been taking place over the last 20 years (since open seminatural habitats stopped being planted) at a rate (averaged annual area) that more than exceeds the areas that would be restored annually. Currently woodland creation rates are low, but a) incentives are poorer than they have been and b) still exceed the potential rate of restoration.</p> <p>There needs to be an acceleration of the rate of native woodland creation incentivised by government for reasons of biodiversity conservation, landscape and amenity</p>
<p>Factors to consider when deciding which policy is likely to work best</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>
No.	<p>This is about restoring open habitats from a legacy of decision-making that caused them to be replaced by plantation forestry, and in some cases to be abandoned to succession. By definition a habitat is a place for biodiversity. However, the importance of biodiversity is significantly underplayed in this consultation.</p> <p>The dominance of carbon and timber production issues lead to imbalance and appear to be contra to government's own policies for biodiversity conservation</p>
<p>Implications for delivery mechanisms</p>	
23.	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>
	<p>You have underplayed the benefits of restoration of open habitats such that anyone not well versed in the issues would understand why it was being suggested.</p> <p>The scope of open habitats species that would benefit, and if the scale of restoration delivered is in anyway commensurate with the potential would be put onto a sustainable footing and no longer require specific conservation, is huge.</p> <p>You have missed completely the issue that existing open habitats are very expensive to manage and this is a cost that is either borne by the ag-env schemes or will cause</p>

No	Question.
	owners not to manage. By delivering restoration on a big enough scale the unit cost of management of the whole will be greatly reduced and unmanaged sites would be much more attractive to manage as part of a whole large-scale site.
	<p>Other comments</p> <p>We welcome your input on any other aspect of this consultation.</p>
	<p>Table 4:</p> <p>As there appears to be no other place to comment:</p> <p>Costs: This is biased</p> <ul style="list-style-type: none"> - where is the cost (or profit?) of rotational plantation forestry on poor soils? - The maintenance costs of open habitat are linked to scale; for lowland heathland this ranges from c£210 / ha for a 20 ha site to £70 / ha for a 500 ha unit. As restoration from forestry plantation and successional woodland will significantly increase patch size the cost will be much less than you suggest, and will be readily delivered through HLS. <p>Quality of life and landscape: you talk about poor landscape design – one of the biggest negative impact on landscape is the geometric intrusion into open countryside of plantation forestry. FC have themselves proved that with care restoration can produce high quality landscapes – you could produce some best practice based on eg the FE experience in New Forest and Dorset.</p> <p>Historic: it is not appropriate to indicate negative due to operational damage; this is as likely if not more so if retained as a managed plantation.</p> <p>Water quality: should be positive - this could well be enhanced through reduced DOC and reduced peak flow following reversal of forest drainage.</p> <p>Positive engagement: should be neutral not negative as the adoption of best practice is obligated through EIA process.</p> <p>6.5.1 no but HLS does!!</p>

Please include the "information about you" form with your response.³

Please send your completed forms to:

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By 17.00hrs, Friday 5 June 2009.

³ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.