

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:	Julian Ohlsen
Your organisation (if any):	Tilhill Forestry Ltd
Date:	4 June 2009

No	Question.
The nature of the change	
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>Tilhill acknowledges the development of any policy that will help address the ad hoc and subjective deforestation that is currently being carried out and is proposed in this consultation.</p> <p>We fully endorse active forest management towards a balanced woodland ecosystem that supports a matrix of open ground and woodland cover supporting and enhancing different habitats to their widest benefits, whilst delivering the owner's objectives.</p> <p>Some sites, where the wrong tree is in the wrong place, will clearly have more benefits from removal of trees, stands or woodlands than any advantages of being retained. These benefits need to be considered on their merits, measured and recorded nationally and removal disadvantages addressed by way of compensatory planting or similar actions.</p> <p>Unrecorded and unquantified deforestation is already being carried out through woodland removal as part of development sites, road building and grant conditions/guidance change at felling and restocking under EWGS.</p> <p>Thus our consideration would have to be at the lower end of expectations of around 370 to 500 per Ha across England each year. Once full impacts of current woodland loss can be measured and compared across economic, employment, carbon and public perception this level can be reviewed.</p> <p>Any further permanent removal of England's threatened woodland resource must be minimised (presumption against) and regulated against on the basis that:</p> <ul style="list-style-type: none"> The Forest Act 1967 clearly states that The Forestry Commissioners shall be charged with the general duty of promoting the interests of forestry, the development of afforestation and the production and supply of timber and other forest products in

No	Question.
	<p>Scotland, and in England and Wales. The Commissioners' general duty includes that of promoting the establishment and maintenance in Scotland, and in England and Wales of adequate reserves of growing trees.</p> <ul style="list-style-type: none"> • The UK Forestry Standard demands protection of the timber and forest resource. Revisions to Forest Carbon Standards and Climate Change Guidelines will provide overarching principles of good carbon management and standards for the industry. • Permanent removal of woods or forests to restore or expand open habitat will be measured as deforestation under UK definitions. The UK Government has international commitments to avoid deforestation. England is one of the least wooded countries in Europe at under 9% coverage, compared with the average for European countries of 46%. The economic benefits of the current commercial forest industry help to reduce the balance of payments as the UK continues to import some £6 Billion of timber and timber related products. • The forestry and timber industry, FC and many wider stakeholders are committed to woodland expansion to help future generations gain the benefits of our actions today. • Woods and forests continue to make a significant contribution to the UK Government's commitments for reducing carbon emissions. • The expected reduction in economic activity as a result of future reduced timber resource would lead to loss of jobs, skills base and business when motivation within the forestry and timber industry is declining.
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
Yes. No.	
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?
<p>Yes.</p> <p>Identify the increased cost in managing open habitats as opposed to managing a commercial forest. This will help the review and impact of any revision to the levels of future open ground creation through deforestation</p>	
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?
<p>Yes we agree that woodland and open habitats can be mutually beneficial (see question 1 above). This is already accepted in restructuring of plantations and woodland creation as well as provided through the ephemeral mosaic of open ground in a well managed</p>	

No	Question.
	<p>clearfell silvicultural system. Replacing of woodland habitat with permanent open ground is a question of locally measured, justified benefits, off-set by a strong national increase in appropriate woodland cover.</p> <p>It should be strongly argued that well managed woodlands provide this mutual benefit; open ground creation should not be seen as an alternative for poor or no woodland management.</p>
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 the presumption must continue to include and promote no net loss of productive woodland. Indeed, the presumption should be against any deforestation. [See also answer to Q1]
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	Acceptable, although oak grown for furniture markets would only be considered mature at around 150 years.
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?
	Yes, however the national balancing (off-setting) of woodland loss needs to be the overarching control in terms of timing as the replacement benefits are available.
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?
	Yes - see above
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?
	<p>The consultation does not provide any detail as to the evaluation. This is a key aspect in the whole principle of "approved deforestation". Much more detail is required before we can comment.</p> <p>The principles of the framework appear appropriate</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?

No	Question.
	See above.
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?
<p>Yes. Clearly a maximum level must be established. Any threshold of deforestation must ensure that there is no net loss of woodland cover in England, already one of the lowest coverage's in Europe. [See also answers to Q1]</p> <p>The law currently requires that felled trees must be re-stocked, elsewhere if necessary, unless subject to planning permission, yet even this could have a "replacement" value.</p> <p>We wish to see no net loss of productive woodland in England and would prefer an option of compensatory planting on a like-for-like net-to-gross basis at a national level. New woodland creation grants currently favour broadleaved planting and the employment, resource and carbon losses incurred from conifer removal will need a greater area of broadleaved planting to balance. If commercially productive forest is to be lost then an adjustment must be made to the current grant package with supporting conditions placed in any policy framework.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
<p>Evidence that quantifies historic and current rates of deforestation is unknown. Any threshold of future deforestation must be towards the minimum level on the basis that:</p> <ul style="list-style-type: none"> • Current new planting rates are falling and at best uncertain and therefore cannot be relied upon as an element of accounting in the threshold equation. • The level of future planting rates will be governed by declining funds, increasing costs and increasing competition for land for food production. <p>The cost of managing open ground is estimated at around £320 per Ha per annum as opposed to managing a commercial timber crop of around £20 per Ha per annum. This cost will be incurred by the state from FC land management or in the private sector generally met by grant aid and thus the tax payer.</p> <ul style="list-style-type: none"> • The less commercial nature of recent and current new woodland creation planting, can not be considered as a like-for-like off set when considering economic, carbon sink and employment losses. [See also answers to Q1 and 11] • Pre-commercial woodland removal should be avoided where-ever possible as this sees a loss of investment to date, loss of timber production in the shorter term and thus high impacts on employment in the timber industry sector as well as losing an opportunity for potential gradual reversion to an alternative habitat. 	
<p>Key variables</p> <p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
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?

No	Question.
	<p>No. The general picture on biodiversity is of recovery in many groups of species but continued decline and vulnerability in specialists. Future impacts on these species are impossible to predict or quantify, for example, development, pollution, competition from invasive species and climate change. There are large gaps in the evidence base on the net benefit from a given amount and type of deforestation for open habitat restoration. Therefore, in these times of economic uncertainty, it is not a wise use of public money to support such vague and uncertain benefits from deforestation over well known, revenue earning, benefits that can be delivered from existing woodlands.</p> <p>Decisions on any further deforestation for open habitats should take into consideration the ability of the woodland to support key species through effective management, such as, thinning or restructuring, rather than removal. Deforestation should be the last resort.</p>
14.	<p>Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the outline practices presented? How could we best ensure that such practices are adopted?</p>
	<p>Yes. Yes. However a study undertaken for the FC on Forest Carbon by Sandy Greig in 2006 highlighted that it is vital that forests are resilient against climate change and that productive capacity is maintained. Maximising wood production in the context of sustainable forest management is desirable. While opportunities should be taken to reduce carbon emissions from forest management in reality these are very low compared to the potential for carbon gain through improved storage in trees, wood products and soils.</p> <p>Best practice guidance should be produced.</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>Yes both issues are essential in any considerations to deforest . Calculations on carbon balance must be a key part of any EIA or proposal for deforestation .</p> <p>Some 87,000ha of conifer plantation grows on lowland heathland – targeted for restoration. Typical CO₂ equivalent stock values as measured by yield class for native broadleaves @ 80years old is 500t/ha. For productive conifer at less than half that age the figure is £350t/ha.</p> <p>Deforestation for open habitat restoration has the potential to threaten soils. FC has publicly admitted that if the rate of deforestation increases they would have to take steps to ensure the carbon sink is not reduced. Speaking at the ICF's National Conference in 2008, Mats Olsson, Soils Professor, Swedish University of Agricultural Sciences, stated that long-term reductions on CO₂ emissions will be greater from intensively managed forests than compared to unmanaged forests.</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>Willis, et al, 2003. The Social and Environmental Benefits of Forestry in Great Britain identified the value of the range of non-timber benefits that forestry in the UK provides at</p>

No	Question.
	<p>£1 bn/year. Of this the carbon element was approximately 10% i.e. for every £ invested in a carbon credit £9 in additional public benefit could accrue over time.</p> <p>Climate change will do more to change habitat than anything man can achieve through felling. Open heathland is thought to be highly vulnerable to projected climate, for example, it is not resilient to drought and the integrity is damaged further by erosion caused by wind and heavy rainfall.</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>Yes a more dynamic approach is required. Assessment of condition as used in SSSIs is thought by many to be fundamentally flawed. It is based on a static point in history when, in reality, habitats are dynamic.</p> <p>Species and habitats change in response to the environment. We cannot know exactly what effects, both directly and indirectly, climate change will have on species, habitats and ecosystems.</p> <p>Many current open habitats are originally a man-made feature or environment through agricultural use or fire management. As agricultural land practices become redundant and climate change alters vegetation and soils, we can not hope to engineer "habitats". To artificially recreate something that is no longer a sustainable land use, either a long term cost must be incurred to do so or the habitat needs to evolve.</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>A site by site management plan approach has merits but at what cost and over what time scale? Is there ever an end point to introducing an alternative land use such as open ground? A moving mosaic measure may be a better guide to creating the balance required as a flexible alternative whilst maintaining some commercial land use.</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>In the FC "Open habitats and the Public Forest Estate" they estimate the current planned open ground restoration will result in an annual loss of 114,000m³ per annum. This represents around 30 jobs in the harvesting, marketing and sawmilling sectors. Furthermore this will see an annual reduction on timber income to the public body of somewhere in the order of £1million.</p> <p>If an additional 3,700 Ha are lost with no new commercial woodland to replace it, this could see a further loss of 20 jobs from a sector already at a critical mass before the potential collapse of a home grown timber processing industry.</p> <p>Promoting economic growth whilst reducing our carbon footprint is at the top of the</p>

No	Question.
	<p>Government's agenda. In terms of market forces we are in a time of increasing global demand for timber and clean, cost-effective fuel sources with low carbon mileage.</p> <p>Representing our timber growing clients (of some 200,000 Ha) viewpoint, any policy to deliver deforestation will further demonstrate the perceived lack of national support and understanding for the private sector. Significant costs are already absorbed by the sector in implementing the proliferation of existing policies, Habitats Directive requirements, PAWS restoration, certification requirements and tree safety requirements with no corresponding benefits or increase in woodland quality or outputs.</p> <p>The private sector in England accounts for 80% of the total woodland area. There is a very clear and present danger that the creation and implementation of any further, disobliging, policies will lead to increased disengagement and thus, perversely, increased under-managed woodlands offering much less in ecological benefits.</p> <p>The forecast reduction in softwood timber availability from 2012 onwards can only be mitigated by maintaining the softwood resource through restocking and new planting. Deforestation is an impediment to that.</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>With future government and European funding under threat, policy No 6.3.1 - The first approach on what level can be adequately funded - must have highest priority. Without this, any habitats created will simply be lost to a different woodland habitat through natural succession and loss of face to all involved.</p>	
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
<p>A regional approach to compensatory planting could manage appropriate levels of new woodland creation to balance off the same regions loss of woodland benefits. Caution on not applying a simple one Ha lost equals one Ha newly planted scenario as we describe in question 11. Certainly enforced compensatory planting of any removal with native woodland is not appropriate.</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>
<p>Yes.</p> <p>Yes - Will the policy send a negative message to the forestry industry and to private woodland owners?</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>One aspect is not mentioned. The Habitats Regulations (European Protected Species) has</p>	

No	Question.
	<p>to be considered under the legislation section. We have to guard against a race to benefit one species habitat at the potential disturbance or damage to another. This European legislation is promoted and overseen by the FC.</p> <p>The implication of CRoW to open ground restoration is a major constraint to the private sector as is the potential loss of a woodland's commercial value and as such being vulnerable to being classified as non-commercial and losing certain fiscal benefits.</p>
	<p>Other comments</p> <p>We welcome your input on any other aspect of this consultation.</p>
	<p>This single corporate response should be seen to represent a client base of some 1,100 private individuals and company forest owners. We offer management and forestry advice over some 200,000 Ha of UK woodland. Some 160,000 Ha are certificated and managed to UKWAS standards.</p> <p>As a timber harvesting company we directly harvest and market some 1.5million tonnes of timber from both the Forestry Commission and private owners each year. Accordingly we trust that our responses will be given the weight that this representation deserves.</p>

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.