

RESTORING AND EXPANDING OPEN HABITATS FROM WOODS AND FOREST IN ENGLAND

Responses to consultation questions from
West Christchurch Residents Association
7 Hurn Road, Christchurch, Dorset, BH23 2RJ
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Question No. 1 – The nature of the change – 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?

In principle we prefer the lower level of intervention and in practice that some locations should have no intervention at all due to local circumstances (see our answer to question No. 8). The level should be low because:

- a) The extremely high initial and maintenance costs for what will be to the benefit of only a small number of extremists. Conservationists are keen to exclude the general public from open habitat sites so there will be no public benefit at all even though the general public fund it.
- b) Felling at the higher level is not compatible with sustainable timber production.
- c) The consultation document on page 15 notes that the likely carbon balance impact of tree removal is negative. This, in itself, is unacceptable, so if the policy were to be implemented, it should be at the low level to reduce the impact on England's total carbon emission targets as set out by the Government.
- d) To fell trees at the higher level could be economically, socially and environmentally catastrophic.

Question No. 2 – Desired outcomes – Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?

- **Ecological communities able to cope with threats.** The document states that the main threat is climate change. The policy of woodland/forest removal will accelerate this problem and promote climate change via negative carbon balance (consultation document page 15).
- **Financial viability.** Perpetual open habitat management costs money, whereas forest management produces a sustainable resource.
- **Keeping to Government commitments on woodland cover.** England should have an aspiration to increase its sustainable forest/woodland which would enhance the Government's credibility in international negotiation on climate change and forestry.
- **Positive engagement by local and other users.** We believe it is very important that local people should be listened to.
- **Carbon balance.** Agreed
- **Timber sector activity.** We agree with this desired outcome, but believe it to be at odds with the higher level of intervention. The only alternative that would sustain the businesses that rely on the timber industry would be to increase imports, resulting in a negative carbon emission impact.
- **Woodland biodiversity.** Agreed.

In addition:

- **Positive public benefit.** Each area considered for open habitat expansion should be appraised to ascertain whether there would be public advantage or harm from implementation of the policy.

Question No. 3 – Measuring the success of the policy – Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?

Under the heading “**Outcome**” there is - **positive engagement by local and other users**. Another Indicator should be added to this section as follows: - “Get feedback during implementation of the project from local residents and recreational users of areas affected by this policy”. The proposed indicators appear to point to a process that can filter out the need for local engagement after the scoping stage of an EIA.

Question No. 4 – We will treat woodland and open habitats as potentially mutually beneficial – 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?

The above statement should read “woodland/forest” and not just woodland. We agree that woodland/forest and open habitats are potentially mutually beneficial. We question the “promotion” of the idea as “support” for tree felling. If the concept of open habitat restoration is valid then it should not be necessary to “push” for support. A straightforward factual explanation of the “mutually beneficial” case should suffice leaving people to make up their own minds to support or oppose the policy.

Question No. 5 – A presumption against removal of ‘mature native woodland’ – Do you agree with the principle that there should be a presumption against removal of ancient and ‘mature native woodland’?

We agree with the principle. However we would like to see an amendment to the heading and definition of ‘mature native woodland’. This should be ‘**mature British native trees**’. This would then include mature Scots Pine, some of which are immensely environmentally important in certain locations. Indeed we are aware of Natural England sites where mature Scots pine are protected, and many Local Authorities have areas of mature Scots pine with Preservation Orders on them. These mature trees should not be sidelined and treated as scrub. We would also like to see the definition of a mature tree changed from 80 to 60 years.

Question No. 6 – What do you think of our proposed outline definition of “mature native woodland”?

We believe the definition is incorrect and should be ‘**mature British native trees**’, to include “sites currently composed of British native broadleaves and conifers that have been wooded for at least 80 years etc.”. Mature Scots pine is equivalent to other mature trees in so far as carbon sequestration, wildlife value, amenity value and aesthetic landscape value. Our experience is that the public do not differentiate between different tree species – a mature tree is a mature tree.

Question No. 7 – We will expect practitioners to help local users to participate in development of initial proposals – Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?

We agree that local participation in decision making is absolutely essential. If there is no local consultation, practitioners could face intense opposition to their proposals, and communities could feel threatened and dictated to from “on high”. Our preferred option is engagement with the lowest level of community groups, such as Parish Councils and Residents Associations.

Question No. 8 – We will promote mechanisms for prioritising woodland removal at a regional level – Do you agree that prioritisation at a regional level is appropriate for this policy?

We do not agree that woodland/forest removal should be prioritised at a regional level. Regions are too large and mean nothing to the ordinary citizen. Each area which is to be the subject of a felling licence should be looked at individually in relation to its topography, hydrology, and its carbon sequestration requirements proportionate to its economic infrastructure and leisure appeal.

Question No. 9 – We will apply a framework for evaluation to projects – Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?

We do not agree that the first heading should be “the problem”. It may not be accepted by all that there is a problem. Instead we propose the heading should be changed to “the challenge” (as per the heading of item 3.1, page 8 of the consultation document).

As an addition we suggest the inclusion of a heading “financial appraisal”. This would ensure that as the framework is implemented, an evaluation would ensure that it is within achievable financial parameters.

The second addition is the inclusion of a heading “local opinion appraisal”. This would mean that a Parish Council or Residents Group could feed back local opinion into the evaluation process.

Our preferred option for applying this element is No. 2 on page 26 of the consultation document – “We could insist on using the framework as a condition of funding”.

Question No. 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?

On commencement, during implementation and at completion, there should be ongoing discussion and contact with the local community. In this way, practitioners are more likely to receive support from affected communities rather than be faced with residents chaining themselves to trees.

Question No. 11 – 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 – 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 underlined heading above states “we will try not to go over a threshold ...”. **We do not believe this is good enough.** If a threshold is set then it must be adhered to. Please note the wording in the consultation document, page 27, para. 6.1.6 – “*The UK Government has international commitments to avoid deforestation associated mainly with supporting international efforts to combat climate change*”. Therefore any threshold must be abided by and certainly not exceeded.

That same paragraph goes on to state “High standards of woodland management ... in the UK *appear to help* the UK Government’s credibility...”. We believe this should be more positive to state fact rather than opinion, i.e. that “woodland management ...*does help* the UK Government’s credibility....”

We agree with the principle of a threshold rate, as long as it is the lower level, and it is adhered to. We refer you to our Answer No. 1 which states our preference as the lower level of intervention or in some circumstances nil intervention due to local circumstances.

With regard to our preferred mechanism, please note that ***we only agree with the fifth mechanism***, and comment on the options as follows:

- Suggestion - review losses and gains of woodland according to national inventory... Comment – We do not agree, levels must be ascertained at a local level with local participation.
- Suggestion – allow projects on a first come first served basis ... Comment – We do not agree, and feel that this option could be open to abuse, i.e. who decides on priority and how are the public advised and involved?
- Suggestion – adjust timing of woodland removal to keep overall rate below threshold. Comment – We do not agree, could be seen to be massaging the figures and may not be transparent. Could be seen as placating local opposition until such time as any furore had died down (timing) and then implementing the policy regardless.
- Suggestion – could ‘net off’ woodland creation projects against removal for open habitats. Comment – We do not agree, again could be perceived to be massaging figures, transparency is essential.
- Suggestion – require planting of equivalent area of woodland as compensation for loss. Comment – ***this is a good idea***, as there will then be no loss of woodland and funding is available, not only for planting but for management as well (para 6.3.4).
- Suggestion – apply threshold on a regional as well as a national basis. Comment – We do not agree and refer you to our answer No. 8

Question No. 12 – Do you consider that the proposed threshold is about right, too high or too low?

We cannot see in the consultation document an actual “proposed threshold”. We can only see the option of woodland/forest removal threshold between the ranges of

370 to 3,000 ha per annum over 10-15 years. Our preference is the lower threshold of 370 ha p.a. (see answer No. 1). As already stated in answer 1 we consider that even this lower threshold would be too high in certain areas, and each location should be considered on its own merits (see our answer to question No. 8).

Key Variables

What is the balance between achieving biodiversity objectives and the need to reduce greenhouse gas emissions?

Question No. 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?

We refer you to the last paragraph on Page 29 of the consultation document – “there is great uncertainty over the magnitude of the net benefit from a given amount and type of open habitat restoration or expansion”. We believe that higher threshold felling would be an unjustifiable “leap of faith”.

We do not see how any level can be set until scientists have more knowledge about the effects of felling so many trees in England. Once felled, the benefits of an established tree are irreplaceable in the short term and will take decades to substitute.

We note the next line of the last paragraph on page 29 – “A commitment to a framework for evaluation should gradually fill this evidence gap”. ***We believe this is not good enough; it is neither clear nor positive.*** The words *should* and *gradually* show doubt in the policy. There is no room for doubt in proposals for mass tree felling. It will be too late – when trees are gone, they are gone! The responsible way forward is to wait until there is proven scientific evidence, that is, no evidence gap, before proceeding with this irreversible and irresponsible policy.

Question No. 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?

If this policy were to be implemented, then obviously we agree with management practices to minimise carbon emissions. However we would point out that the whole process is carbon negative and is not compatible with the UK Government’s responsibilities and commitments on climate change. We note that:

- a) Felling – results in a major loss of carbon absorbing trees
- b) Restoration performance is a carbon producing activity, even if minimised
- c) After restoration – open habitat absorbs less carbon than woodland/forest, as noted on page 30 of the consultation document under the heading ‘long term average carbon store’.

We do not feel able to comment on the outline practices presented, until the “evidence gap” has been filled by satisfactory research, and proven information is available, so that we can make a sensible judgement.

Question No. 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?

We do.

Question No. 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?

The need to reduce carbon emissions is paramount and should take precedence over achieving biodiversity objectives. However a degree of balance could be achieved by a very gradual approach to this policy. If climate change is not addressed as a priority, then biodiversity objectives will be threatened anyway. It is not common sense to try to protect certain species by making the overall situation worse.

Question No. 17 – Should we be managing open habitats to keep them in ‘favourable condition’ or should we adopt a more dynamic approach to land management? – 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?

Woodland management for sustainable timber production already delivers a shifting mosaic of woodland and open habitat. We do not believe that open habitats outside of SSSIs should be kept in ‘favourable condition’.

At this point we would mention that we have not seen a definition of ‘*favourable condition*’ and understand that the requirement for that status (whatever it is) is not set out in any legislation. The term appears to originate from a European Habitats Directive. Also favourable condition targets are not set for individual SSSIs. *It is often forgotten* that whilst public bodies are required to have regard to nature conservation, they are also required to uphold the general principle of balancing the public interest between competing benefits.

If areas of open habitat outside of SSSIs were to be kept to the same standard of ‘favourable condition’, then the public would be marginalized. It is already Natural England policy to deter the general public from using open habitat SSSIs for recreation and to this end they have been promoting “alternative” areas in many localities where the public should be encouraged to go instead of the SSSI.

These alternative areas are termed “robust”, and many of them are Forestry Commission sites, which have areas of open habitat as well as woodland/forest. If these alternative open habitat and woodland areas were to be managed in the same manner as SSSIs, i.e. ‘favourable condition’, then there would be nowhere for the public to go for recreation. There must be sensible balance between nature conservation and public amenity. We favour the dynamic landscape of a shifting mosaic of woodland and open habitat, which benefits many species of wildlife, protected and otherwise, and also the general public. It also allows for sustainable timber production and maintains the UK carbon balance.

Question No. 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?

We do not agree that all restoration proposals should have an endpoint as per SSSI habitats. Please see our answer to question No. 17.

Question No. 19 – What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry? – Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?

Please refer to our answer to question No. 1

Question No. 20 – Different approaches to applying policy – 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?

Approach No. 1

Question No. 21 – The role of compensatory planting – What is the appropriate role of compensatory planting in this policy?

We must not underestimate the value of trees for carbon sequestration, wildlife, amenity/leisure and aesthetic landscape value. We would comment on the various ways in which the policy could be applied as follows:

- Suggestion – look for ways of imposing a condition of compensatory planting as part of accepting woodland removal. We agree.
- Suggestion – adopt a softer approach and encourage the inclusion of woodland expansion. We agree.
- Suggestion – insist on formal commitments to plant compensatory woodland etc. We agree.
- Suggestion – look for compensatory planting close to woodland that is being lost, or somewhere else in England. No, compensatory planting must be in the same locale as the woodland that is lost.
- Suggestion – look for planting that replaces like for like or replace with native woodland. Replacement with a mix of British native trees.

The policy of compensatory planting makes economic sense, with generous grants available not only for planting, but for woodland management.

Question No. 22 – Factors to consider when deciding which policy is likely to work best – 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?

We believe the set of questions are reasonable, however we would suggest a few changes and an additional question:

- a) **Ecological communities able to cope with threats.** The first question should be *should* more open habitat be developed not *will* more open habitat be developed?
- b) **Long term viability.** The first question is incorrect – to what extent will long term delivery of public benefit rely on long term public funding? This question assumes that open habitat is to the public benefit and this is not always the case. In fact in some locations the formation of open habitat rather than woodland/forest is to the detriment of the general public.
- c) **Woodland biodiversity.** The second question should read mature *British* woodland rather than *native* woodland.
- d) **Carbon balance.** We would like to see a **further question under this heading**, as follows: Should this policy proceed at all before the evidence gap relating to carbon loss has been filled by satisfactory research?

Question No. 23 – Implications for delivery mechanisms – Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?

Answer – Yes, we believe you have missed a very important point which should be included in section 6.5.5 Research and Evidence. There is no reference made to the evidence gap outlined in the last 2 paragraphs on page 30 of the consultation document. Those paragraphs refer to long term average carbon store and substitution. Research and evidence should include the consequences to the environment, of the net loss of carbon absorption which will result if this policy is implemented at any level.

OTHER COMMENTS – We welcome your input on any other aspect of this consultation.

This consultation document anticipates “high quality local participation”. We believe that you will achieve hardly any local participation, whether high quality or otherwise, because of the complicated nature of the document.

We spent several hours reading, understanding, researching and discussing the 23 questions. It then took many more hours to type up the draft responses for circulation, make changes and agree a final submission.

It is our opinion that only those with an “interest” in this proposed open habitat policy will reply to the consultation, i.e. conservation organisations that are in support of the policy. This may well result in an unbalanced response to the consultation.