

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:	Jim White
Your organisation (if any):	n/a
Date:	03/06/09

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?
At least the maximum level. These former valued habitats have been lost to (conifer) plantations with none of the rationale and heart-searching that is part of this consultation - and with no thought to the loss of biodiversity, cultural history and landscape. Take this belated chance to redress the equation at last!	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
The loss of cultural landscapes - and their replacement by huge stands of conifers - has not been taken into account (eg lowland heathland) and the potential archaeological resource as well as undeniable biodiversity potential.	
The impact of planted conifers goes way beyond the planted sites. Huge resources have had to be deployed by conservation bodies and sympathetic landowners to restore eg heathland on sites that remained heath but are constantly invaded by self-sown trees from the plantations. This cost to environment needs to be factored into the sums presented in the consultation. Less of this reactive conservation work, if serious plantation removal happens, will be a saving!	
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?
Ability to restore landscape-scale management - eg extensive grazing across both	

No	Question.
	designated and restored habitats. More resilient and more cost-effective.
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?
I can see very little benefit in vast stands of alien conifer - especially on sites that 50+ years ago were part of a historic and ancient habitat (eg heathland). To call these plantations "woodland" seeks to overstate their value and adds an emotive slant to the consultation. Call them what they are - plantations of conifers and open habitats and you might get a different answer!	
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 - there is more than enough inappropriate conifer plantation without confusing the issue with proper, valued woodland.	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
OK	
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?
Not when the habitat to be restored is of national/international importance - the advice should be taken from nature conservation professionals and not treated as a local issue.	
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?
Not necessarily - See answer to Q 7	
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	Question.
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?
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?
As long as it allows some top priority habitats/sites to be dealt with in a meaningful way and does not spread the impact so sparsely the difference is pointless	
12.	Do you consider that the proposed threshold is about right, too high or too low?
In some situations too low - eg heathland where restoration of highest value habitat of European importance is a certain outcome.	
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?
Longterm cover by dwarf shrub communities (heath) may be no less effective than conifers that are all clearfelled every 60 years or so	
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?
Ignores the regular carbon emissions that are part of maintaining/plantins/thinning and regularly harvetsing the existing plantation. Has the emphasis on intervention for open habitats really and honestly taken all that on board?	
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?
See answers to 14 & 15	
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?

No	Question.
	In the scale of things the impact of this intervention on carbon is pretty small scale - but the impact on rare habitats/species could be massive.
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?
The condition assessment should be the primary assessment but with some more flexibility to be agreed with NE and other conservation advisers	
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?
Needs to have a robust and workable alternative available before such a judgement can be made. What is being proposed?	
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?
What about looking at managing the large volume of neglected woodland as an alternative - with both timber, employment and biodiversity possibilities?	
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?
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
The overriding need to redress the balance and the losses caused to biodiversity from the original plantations should be the priority and not held back by some artificial compensation ideas. If there are opportunities, by all means take them, but not to hold back the scheme.	
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?

No	Question.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Other comments	
We welcome your input on any other aspect of this consultation.	
The presentation of the arguments is heavily biased in favour of doing the minimum. Very little has been explained about the original losses and the scarcity of the habitats/species and landscapes that could be restored. Too many "leading" questions!!!	

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.