

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:	Graham Hunt
Your organisation (if any):	West Midlands Regional Advisory Committee
Date:	4 th June 2009

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>Our key concern is how will the programme be funded bearing in mind the pressure on future public funding. Furthermore the assumption that non-government organisations will provide between 30-40% of costs needs to be further explored. Even at the lower scenario level this will be between £7.29m and £9.99m which will be a huge challenge for the third sector.</p> <p>We suspect that the likely funding shortfall we mean that sites will need to be prioritised. For example a first strand of work could focus on restoring priority BAP habitats. Also it maybe more cost effective to link restoration to the harvesting cycle of crops to maximise income from timber sales. Whilst this will mean that the length of the programme could be extended it will reduce the amount of public subsidy needed and minimise the impact on the forestry sector.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
Yes a reasonable list of desired outcomes has been offered.	
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?
Cost is again a potential issue. The proposed monitoring system is likely to be expensive to run. Could it be simplified? For example, a key measure of success could be the	

No	Question.
	number or area covered by key indicator species (probably vegetation) relative to a baseline before work commences.
<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.	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?
Agree	
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'?
Agree	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
Agree	
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?
We agree that local participation in decision making is important. However to be fully effective a combination of all the listed engagement options will be necessary. People often react negatively to change. So sufficient time and resources need to be provided to allow consultation to be meaningful. A comprehensive and interactive consultation strategy needs to be put in place prior to any decisions being made.	
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 regional prioritisation is appropriate providing there is scope to allow input at the local level to the decision making process. It might be helpful for the county tier of Local Strategic Partnerships to be used to gain a collective community response to the proposed priorities.	
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?
We agree with the proposed framework. Our preference is for Option 2 with the support	

No	Question.
	of Option 4.
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?
	If the proposed framework is to be used as a condition of funding as suggested above then the process will not work if practitioners are unable to use the framework. So it is crucial that a regionally based programme of briefings and training workshops is provided. This has been done with good effect in respect of other regulations and policies
	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?
	We support the principle of an England scale threshold rate. This could be achieved using a combination of bullet points 3,4 and 6. This is particularly important in respect of the latter point as it allow RDF's to become key policy drivers.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	We support the proposed threshold providing regular reviews are built into the process.
	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?
	We have no alternatives methods to offer.
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?
	We agree with the proposed management practices and suggest that they are extended to cover all forestry operations, not just those carried out under this programme. However thought also needs to be given to the impact that any delay in restoration could have on the seed bank of semi natural vegetation. In the case of priority specialist species it may not always be possible to achieve the best ecological outcome if trees are allowed to reach full maturity and a decision to fell earlier maybe more appropriate.
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?

No	Question.
Yes	
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?
	Our inclination is that we should lean towards biodiversity objectives where we are dealing with our most valuable habitats/semi-natural sites and focus on appropriate woodland creation elsewhere. Within the document there is a recognition that implementing this policy will help key species to adapt to climate change, something which is happening and likely to become more significant regardless of how little open habitat we restore. Tackling climate change is obviously a good thing but perhaps one of the reasons for doing this is to allow our best landscapes and wildlife to flourish.
	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?
Yes	
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 are not in favour of any modification of conservation objectives for SSSI's. Therefore we would support the view that the endpoint for all restoration proposals should be judged against favourable conditions as defined for SSSI's
	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?
No	
	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?
	We think that is essential that the evidence gap relating to timber availability and economic activity is completed before any decision is made on what option to adopt.
	The role of compensatory planting
21.	What is the appropriate role of compensatory planting in this policy?

No	Question.
<p>We believe that it would be difficult to achieve a consistent policy of compensatory planting. It raises issues relating to the availability of land both in terms of ownership and suitability. The potential negative impacts from woodland removal would be better managed through the monitoring and review processes already referred to in the answers to the questions above.</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>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>No.</p>	
<p>Other comments</p>	
<p>We welcome your input on any other aspect of this consultation.</p>	
<p>Table 4 (4.2) - Carbon balance – clearly taking trees away would reduce the carbon store but how does this relate to the role of afforested peat moors which might once have been carbon sinks? Table 4 (4.2) – Why are quality of life and landscape linked as one factor? There could be potential impacts on quality of life that go beyond the visual and sensory implications of landscape change. For example the removal of a woodland and its replacement with a more sensitive could reduce the capacity of the land in terms of public access and recreational activity. This will could effect both local amenity and wider visiting as part of tourism activity.</p>	

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.