

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:	Jeff Edwards
Your organisation (if any):	West Midlands Biodiversity Partnership
Date:	5 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?
The west midlands is recognised as having particularly low cover of semi-natural habitats, with habitats severely fragmented. The Partnership has a 50 year vision for biodiversity and wishes to see the extent of habitat increased to help wildlife adapt in the face of changing climate. The Partnership would therefore support the more ambitious target	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
The outcomes need to be considered in the light of the policy driver thus certain desired outcomes relating to biodiversity should be given greater weight over the others.	
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?
The 'ecological communities able to cope with threats' indicator should also take into account the climate change adaptation principles including better development of habitat networks	
The woodland biodiversity indicator should only take account of the loss of existing BAP woodland to open habitats not 'established native woodland'	
The indicators should be weighed to reflect the challenge and the measures of success should be clearly identified as being either 'positive' measures or 'negative' measures. Judgements on the success should only be made against the policy driver.	

No	Question.
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?
This needs to be judged in the context of the location and the scale of the proposal. A mosaic of habitats across a landscape is far more desirable in some locations than others and should be subject to consideration on a case by case basis. Any decision should take account of the importance of the habitat being created in relation to the surrounding habitats and designations.	
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'?
There should definitely be a general presumption against large scale modification of ancient semi-natural woodland. However there should not be a blanket presumption against removal of 'mature woodland' as defined i.e that which has been 'wooded for at least 80 years'. The decision to remove trees/woodland needs to be made on a site by site basis, in some cases mature woodland may need to be removed as part of a restoration scheme e.g. to prevent further recolonisation, restore water levels or reduce predation.	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
The definition needs to be amended, care is required to ensure that no blanket presumption is applied and if it is that the criteria for considering woodland/tree removal makes ecological sense. The criteria as currently set would be extremely difficult to justify ecologically if it were applied to all sites defined as woodland as set out in the Kyoto protocol (section 6.1.6 of this consultation).	
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?
Large and small local organisations and the public are keenly aware that their local environment is a key part of their quality of life. They are not slow to let decision-makers, planners, land managers or others know when the quality of their local environment is threatened with, or is damaged by, the pressures, impacts and demands made on it. Experiences of this concern only too well illustrate some of the important issues at the heart of this particular Forestry Commission consultation. These are the importance of communication and the use of evidence to justify management, which are critical to achieving potential biodiversity gains.	
We will promote mechanisms for prioritising woodland removal at a regional level	

No	Question.
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
	Regional priorities should be used to help assess large scale proposals for habitat creation but it is important that local priorities are also considered. The policy needs to be applied in the right place and at the right scale if it is to effectively deliver the optimum biodiversity benefits. The Local Biodiversity Partnership should be used to agree local 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?
	No comment
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?
	As this Defra policy is proposed to deliver biodiversity benefits then FC needs to support all schemes in line with their statutory duty for biodiversity. As an active member of the regional and local biodiversity partnerships they should identify and agree regional or local priorities through the local and regional biodiversity partnerships.
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?
	The benefits for biodiversity need to be weighed against other considerations, a long term view needs to be taken in considering the benefits derived. It seems that woodland cover over the long term is set to increase for a number of reasons so the removal of woodland cover in connection with this policy should be considered as a temporary measure in terms of the national woodland cover and the reasons for this clearly articulated. There should be no requirement for compensatory planting.
12.	Do you consider that the proposed threshold is about right, too high or too low?
	According to FC Forestry Facts & Figures 2008 document, over past 5 years (2004 - 2008) - UK wide there has been 10240 ha of planting. In England average new planting per year= 3880ha. This is contradictory to the quoted figure in this consultation of 1100ha's. If the 2008 published figures are accurate it will be possible to achieve the higher threshold to establish open habitats and achieve HAP targets without net deforestation. (http://www.forestry.gov.uk/pdf/FCFS208.pdf/\$FILE/FCFS208.pdf)
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

No	Question.
	biodiversity objectives from different levels of restoration or expansion of open habitats?
	Meeting the agreed regional and local BAP targets should be the major consideration in terms of estimating this. FC are a key players in the biodiversity partnerships at all levels (national, regional and local) and therefore play a key role in agreeing BAP targets and priorities for action. The policy should be applied using existing mechanisms i.e the existing BAP partnerships and Action Plans.
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?
	Best practice should always be used where possible.
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?
	This should not be used to determine site selection, the carbon balance of any land parcel need to be considered in the context of the wider landscape taking account of changes in land management across all sectors.
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 biodiversity benefits need to be considered as a contribution towards adaptation for climate rather than having a negative impact on mitigation measures i.e the carbon balance. FC needs to promote the removal of trees positively.
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?
	BAP habitats created through this policy must seek to comply with BAP definitions otherwise the policy will of failed to achieve what is was set out to achieve. A dynamic approach to land management is acceptable but needs to be considered across whole landscapes rather than as an objective in terms of % of woodland and open habitat within each site.
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?
	Any modification to the conservation objectives for SSSIs and for BAP habitat should only be undertaken after detailed consultation exercise that examines all the issues in the light of comprehensive scientific knowledge and should not be considered within this

No	Question.
	consultation.
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 comment
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?
	<p>In terms of meeting the objective for this policy the issue of meeting climate change objectives through increases in open habitats on former woodland/forestry sites should be considered as an important positive issue. Adaptation for climate change is an important issue that has not been adequately addressed within this consultation document.</p> <p>If the previously published England average new planting per year (2004-2008) of 3880ha is applied the rate and scale of woodland removal can be increased above the specified 1100ha limit whilst still avoiding negative impacts. This suggests the 3rd approach (6.3.3) can achieve higher levels of open habitat and biodiversity benefit than it currently specifies. In this case this is the preferred option.</p>
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
	The success of this policy should be measured against the BAP and adaptation for climate change objectives. Compensatory planting needs to be considered in terms of long term national woodland cover rather than on a site by site basis. The issue of compensatory planting on a site by site basis should not create a barrier to undertaking appropriate proposals for creating open habitats.
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?
	Adaptation for climate change should have been considered and promoted as a positive objective, the focus of many of the questions distract from the positive benefits that this policy could achieve.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	The use of HLS in terms of managing open habitats created as a consequence of this policy should have been considered.

No	Question.
Other comments	
We welcome your input on any other aspect of this consultation.	
The role of the regional and local BAP partnerships in assisting in determining priorities and locations for creating open habitats should have been considered. FC and NE are key players in these partnerships and are also the national habitat leads. The BAP partnerships are engaged in determining biodiversity priorities, they are mentioned in national planning policy and their role in assisting with the strategic and local decisions should be outlined.	

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.