

Responding on behalf of Worcestershire Wildlife Trust and The West Midlands Wildlife Trusts  
Happy for responses to be shared and contact details to be made available

#### General introduction

Key to this is the opportunity to restore damaged habitats and the restoration of ecologically functioning and resilient ecosystems. It may be necessary to reconsider which habitat can be restored. Although there may be some remnant habitat or seed bank within the woodland the proportions may be so tiny and other factors such as soil ph may have been so damaged that, for example, creating a wetland and reedbeds may be a better idea than trying to reseed unimproved grassland. Reducing the effects of climate change and mitigating the effects of climate change can be achieved, evidence suggests, by creating resilient landscapes that wildlife can move into or through, provide good climate/air quality for people and planting more trees. This consultation and its associated documents states that the overall impact of the tree removal will be to create a negative balance in our woodland capture of CO<sub>2</sub>. It therefore seems imperative that the management to restore or create the new habitats must be a low in energy use as possible, and release or produce low level carbon emissions. Finally more tree planting will be required. The current HLS system offered by NE may provide tree planting opportunities on land not owned by the landowner wishing to carry out open habitat restoration. FC or NE need to maintain records of open habitat created, woodland removed and woodland replanted. Due to the likely scale and impact on public feelings and understanding of the need for tree removal it should be a priority to provide funding to assist with public consultation on major and or sensitive schemes. The need for funding of EIA on similar schemes must also be considered a high priority.

Q1 The key target must be to restore BAP habitats and where possible the 60 year proposal where by timber is removed at highest crop value would seem the most logical way forward.

Q2 Desired outcomes seem appropriate, although carbon balance seems a bit woolly, trees and woods are bound to continue to make a contribution, but how much needs more definition. Even a few trees would make a contribution, albeit very small

Q3 Indicators seem appropriate. Would hope that the FC would research and monitoring looking at the success of connectivity benefits on resilient ecological communities in woodlands and open habitats

Q4 Agree

Q5 Agree

Q6 Agree

Q7 Local participation is helpful. Setting the guidance will be difficult, rural and urban will be different. Guidance would be needed that would aim to a conclusion on the need for wider public consultation.

Q8 Regional yes, and in addition to the RFF the West Mids the biodiversity action plans also have targets for habitat restoration, creation etc. Currently the targets are being looked at region wide.

Q9 Mostly agree with framework, shouldn't targets be part of the necessary and not optional. Preferred option 2.

Q10 Substantial guidance through the system, some could be available electronically, but the scale of this policy and the demands of the habitat restoration to achieve meaningful targets means that more people must be employed to provide excellent on the ground advice. Additional grant aid may also be needed to pay for specialist advice. Should be heavily linked in to the advice provide by NE land advisors. Habitat land restoration requires in-depth technical knowledge and understanding of habitats.

Q11 Agree with a threshold. It should be a combination of bullets 3,4 and 6.

Q12 I can only trust these figures.

Q13 As far as we know from recent and current science and studies restoration of a network and mosaic of open habitats will create resilient ecological communities, and protect and enhance associated species from the effects of climate change.

Q14 Agree. Should be clearly identified at consultation stage of scheme. and should be applied to all forestry work, not just in open habitats restoration.

Q15 Agree

Q16 Achieving biodiversity objectives should be the primary aim. It is obviously complicated. A mosaic of open habitats or a few habitats that create an ecologically resilient network will be

vital for wildlife in reducing the effects of climate change on some wildlife present. The loss of trees through removal creates a negative balance, as explained in the consultation. It is therefore likely that compensatory planting should be a requirement. However many landowners will not have access to land for planting. It would therefore seem to be a role for FC to record land available for planting and to ensure that a negative situation is kept to a minimum or kept positive. HLS schemes could also have land identified within them that would be suitable for planting up. This again should be as much as possible on a targeted basis so that large areas of woodland could be created, albeit that they may be on several landowners property. Bigger is better, more robust, can be designed, and eventually harvested.

Q17 Agree, as SSSI conditions should be higher than is likely to be achieved on other land, and the same conditions may never be found and then condition monitoring of non SSSI would not give sensible answers. The sites would nearly always fail. Outside of SSSIs creating criteria and condition monitoring on a national level would assist this. .

Q18 Cannot judge non SSSIs against SSSI conditions.

Q20 Option 6.3.3. Concerns over 6.3.1 are that after 10 years HLS ends and then what? With numbers of livestock falling in many parts of England many open habitats will be increasingly difficult to manage.

Q21 Compensatory planting would appear a good idea, and a form of land banking is required, and would need to be on a regional or national compensation scheme, as there may not be appropriate land available in the any area where open habitats have been removed or even in the region.

Q22 Yes

Q23 None appear to be missing