

# 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](http://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](http://www.forestry.gov.uk/england-openhabitats-consultation).

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|------------------------------------|--|
| <b>Your name:</b>                  | Jeremy Walker - RAC Chair                            |
| <b>Your organisation (if any):</b> | Regional Advisory Committee Yorkshire and The Humber |
| <b>Date:</b>                       | May 2009   |

| No                              | Question.   |
|---------------------------------|---|
| <b>The nature of the change</b> |   |
| 1.                              | <p>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> <p>RAC Members discussed the issue relating to the scale of restoration / expansion of open habitats with the following key principles / issues emerging:</p> <ul style="list-style-type: none"> <li>- The restoration of open habitats should be seen alongside the creation and management of woodlands. The current England target for native woodland expansion is 53,000 hectares by 2015 with 7,154 ha's being the target for Yorkshire and The Humber. The Committee firmly believes that this target should not be compromised.</li> <li>- It follows that there is strong support for the principle of no net deforestation within the region and a need to recognise the fact that the Regional Forestry Strategy and Regional Spatial Strategy have objectives centred around increasing the level of woodland cover. Therefore any impact relating to deforestation needs to be considered alongside appropriate woodland creation.</li> <li>- An understanding of the importance of open habitats and in particular the need to consider woodlands and open habitats as not being mutually exclusive.</li> <li>- The need to recognise a regional dimension to the policy to enable different regions to agree priorities and rates of restoration / expansion.</li> <li>- A recognition that open habitat creation / restoration is already occurring and that further development should be based on agreed priorities and at a scale and pace to ensure appropriate consideration of other wider objectives (climate change, carbon, landscape etc).</li> </ul> |
| <b>Desired outcomes</b>         |   |
| 2.                              | Have we developed a reasonable list of desired outcomes of the policy? Do you wish  |

| No  | Question.  |
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|   | to suggest any amendments?   |
|   | <p>RAC Members agreed with the key principles identified in the proposed list of desired outcomes. They did however also wish the following points / amendments to be taken into account:</p> <ul style="list-style-type: none"> <li>- Financial viability - the broader issue of sustainability needs to feature alongside the important element of financial viability.</li> <li>- Woodland biodiversity - it is important to balance the requirements relating to woodland HAP's / SAP's alongside those relating to open habitats.</li> </ul>  |
| <p><b>Measuring the success of the policy</b></p>   |  |
| 3.  | <p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>  |
|   | <ul style="list-style-type: none"> <li>- Some indicators seem rather ambitious and it may be more appropriate to consider 'keeping it simple' such as areas of open habitat created and quality of management (e.g. measured through UKBAP species). Aspects such as change in fossil fuel and product substitution benefits, percentage of projects adopting low emissions techniques during restoration, and surveys of business confidence seem complex and difficult to measure / directly attribute to the policy.</li> <li>- The indicators relating to positive engagement by local and other users are inappropriately linked to the EIA process. It would more appropriate to consider any linkages to the landowner / felling Licence process in order to ensure schemes involving deforestation consider the social aspects relating to the current use and engage appropriately with relevant stakeholders.</li> <li>- The timber sector are likely to want to know the impact on productive forest area as well as forecast volumes.</li> </ul> |
| <p><b>Policy proposals</b></p>  |  |
| <p><b>Elements present in the policy</b></p>  |  |
| <p><b>We will treat woodland and open habitats as potentially mutually beneficial</b></p> |  |
| 4.  | <p>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?</p>  |
|   | <p>Yes, RAC Members view woodlands and open habitats as being mutually beneficial. The critical element relates to ensuring the appropriate integration of habitat types and seeking to gain a balanced approach towards land management.</p>  |
| <p><b>A presumption against removal of 'mature native woodland'</b></p>                   |  |
| 5.  | <p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>   |
|   | <p>Yes, ancient and mature native woodlands are recognised for their own biodiversity value. The policy should seek to provide a framework to consider the range of benefits being provided by woodland in order to make a balanced decision as to whether deforestation is appropriate and will deliver a greater level of public benefit / policy.</p>   |

| No   | Question.  |
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| 6.   | <p>What do you think of our proposed outline definition of 'mature native woodland'?</p> <p>RAC Members questioned the value of focussing solely on 'mature native woodland' and using age as a criteria for value. Native woodland is a HAP in it's own right and it would be more appropriate to develop a policy framework that has the ability to value different habitat types in order to support land use change.</p> |
| <p><b>We will expect practitioners to help local users to participate in development of the initial proposals</b></p>  |  |
| 7.   | <p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>  |
| <p>RAC Members think it important to enable local views to be taken into consideration, especially where sites have some form of public access or the change in landscape is likely to be significant (e.g. where an element of deforestation might be involved). It will therefore be important to assess the impact on local users / communities and involve them appropriately in the development / decision making process. The Yorkshire and Humber Regional Forestry Strategy contains a specific objective relating to enhancing community engagement, 'increased and inclusive community engagement in decision making about the management of their local trees and woodlands'. It is also widely recognised that tree felling is regarded as a highly sensitive local issue.</p> <p>It will also be important to be clear on what the requirements are and whether these are 'encouraged' as part of good practice or are 'required' as part of the formal process. The EIA regulations provide a clear decision making process for large schemes which are likely to have a significant impact but the majority of open habitat restoration will be achieved through smaller scale interventions which fall outside the full EIA process.</p> |  |
| <p><b>We will promote mechanisms for prioritising woodland removal at a regional level</b></p>   |  |
| 8.   | <p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>  |
| <p>RAC Members strongly support the need to prioritise decision making on open habitat (deforestation) at a regional level. The Open Habitats Policy should provide a national framework to enable regional priorities to be developed and deforestation decisions, where they are necessary, to be taken regionally.</p> <p>The Yorkshire and Humber region has a number of regional policy documents that will be able to provide specific regional context to aid in the development of any prioritisation. These include the Regional Forestry Strategy, Regional Spatial Strategy(RSS) and the Regional Biodiversity Strategy.</p> <p>The recently published Regional Biodiversity Strategy builds on work developed through the RSS which seeks to identify Habitat Enhancement Areas. This work, combined with the specific regional targets for all habitat types will help aid the development of regional / sub regional priorities.</p>   |  |
| <p><b>We will apply a framework for evaluation to projects</b></p>   |  |
| 9.   | <p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>  |

| No  | Question.  |
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|     | <p>RAC Members support the principle of developing a framework for evaluation. It is however important to clarify whether the evaluation framework should be undertaken by the regulator (FC) as part of the decision making process or by the landowner as a decision support tool to assist in the restoration process. The example in the consultation document is too generic and more specific examples would be useful. The language used is also unhelpful with the first step being described as ' the problem'.</p> |
| 10. | <p>How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?</p>   |
|     | <p>Practitioners welcome practical support and access to information and guidance in order to achieve their objectives (e.g. restoration of a specific habitat). They would not welcome a complex framework or the requirement to evaluate / measure elements which are outside their area of interest or would add a further burden to the cost of management.</p>  |
|     | <p><b>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.</b></p>  |
| 11. | <p>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?</p>  |
|     | <p>It would be helpful if the woodland removal (deforestation) rates were considered alongside woodland creation figures. As an example the native woodland expansion target for Yorkshire and The Humber is 7,154 ha (by 2015) whereas the lowland heathland expansion target is 180 ha's. The Policy should seek to integrate the work already developed through the national Habitat Action Plans and therefore clearly show the expected development of the various habitat types.</p>                                   |
| 12. | <p>Do you consider that the proposed threshold is about right, too high or too low?</p>  |
|     | <p>The threshold should be considered alongside an active programme of woodland creation. RAC Members feel strongly that Yorkshire and The Humber should retain an active programme of woodland creation based on the principle of 'the right tree in the right place'. They also support a programme of open habitat restoration in clearly identified priority areas.</p>  |
|     | <p><b>Key variables</b></p>  |
|     | <p><b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b></p>  |
| 13. | <p>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?</p>   |
|     | <p>The Regional Spatial Strategy and Regional Forestry Strategy are clearly centred on the principles of Sustainable Development. It is therefore important to consider the impacts of any significant land use change in terms of the wider sustainability issues. As a general principle restoration should be targeted to those areas that will provide maximum public benefits (biodiversity, landscape etc.)</p>  |

| No  | Question.  |
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| 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?   |
|     | It is accepted that the overall aim should be to minimise carbon emissions during the restoration or expansion of open habitats. It is however important to have clear management objectives for any open habitat restoration and ensure these are appropriately met through the conversion process.   |
| 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?  |
|     | The carbon balance figures should be based on reasonable / sound assumptions which also take account of a realistic understanding of future / potential land use. As an example if the likely alternative woodland type is native broadleaf this would generate a different outcome than a 2nd generation conifer plantation. It is also important to ensure that carbon is considered alongside other drivers for land use change, biodiversity, landscape etc.   |
| 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?   |
|     | Woodlands have always been regarded as delivering a range of benefits (multi-purpose). In order to achieve an appropriate balance, land management issues need to be considered in a wider context, perhaps at the landscape scale. This issue is also linked to the principle that open habitats and woodlands, if managed appropriately, can be mutually beneficial.   |
|     | <b>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</b>   |
| 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?   |
|     | RAC Members feel that a more flexible / dynamic approach is required for land management outside SSSI's. The key issue being that SSSI's are designated for a specific interest and have an associated management plan directly associated with this interest. In terms of land management over larger areas, the management should be based on wider habitats and the dynamic interaction between open space and woodlands should be seen as being of particular value. In Yorkshire and The Humber we have already begun work focussing on the principles of habitat networks and seeking to restore habitats where they can enhance / improve recognised networks. We also have evidence relating to the use of woodlands / open space by key species such as nightjars / black grouse. |
| 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   |

| No   | Question.  |
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|  | favourable condition as defined for SSSI habitats?   |
|  | <p>The condition assessment tool for assessing SSSI's is understood and widely recognised. This tool could be used to help determine the effectiveness of restoration. The approach would need to be flexible enough to take into account wider objectives that extend beyond the specific biodiversity interests.</p>   |
| <p><b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b></p> |  |
| 19.  | <p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>  |
|  | <p>RAC Members are aware of the continuing demands for both timber and other natural resources (food, biodiversity, and ecosystem services). In particular, Yorkshire and The Humber has a significant woodfuel development programme which aims to increase the amount of woodland under active management and the longer term demands for timber.</p> <p>There is also a clear recognition of the importance of open habitats and the need to address wider landscape issues associated with conifer plantations in sensitive landscapes. The RAC would therefore wish to see an Open Habitats Policy considered alongside woodland creation priorities and also consideration for how this will impact on the timber sector, and would not want a new approach to Open Habitats to reduce the region's production potential.</p>  |
| <p><b>Different approaches to applying policy</b></p>  |  |
| 20.  | <p>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>  |
|  | <p>RAC Members expressed a range of views in relation to which approach to adopt. Members raised a range of issues including:</p> <ol style="list-style-type: none"> <li>1. Concerns over any proposals which would lead to deforestation.</li> <li>2. The importance of sustainably managed woodlands which contain open space / open habitats. This includes recognising the importance of timber production as a key component of sustainable woodlands.</li> <li>3. The key principle of the 'right tree in the right place'.</li> <li>4. The importance of regional involvement in deciding on target / priority areas for conversion to open habitats. This could be led by the FC / Natural England regionally using the RAC as part of the consultation process. The aim would be for the regional areas to contribute towards a wider national target whilst recognising the different aims and aspirations from documents such as the Regional Biodiversity Strategy, Regional Spatial Strategy and the Regional Forestry Strategy.</li> </ol> |
| <p><b>The role of compensatory planting</b></p>  |  |
| 21.  | <p>What is the appropriate role of compensatory planting in this policy?</p>   |
|  | <p>Members recognised the important role that compensatory planting could play as part of the open habitat policy. There was clear support for the need to consider woodland creation alongside any policy drivers for supporting deforestation / woodland removal.</p>  |

| No  | Question.   |
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|   | <p>Specific comments from individual members relating to compensatory planting included:</p> <ol style="list-style-type: none"> <li>1. Each scheme should be considered by 'looking at each case under its own merits'.</li> <li>2. Consideration would need to be given to wider issues such as whether it would be beneficial from a landscape, biodiversity, and timber production perspective.</li> <li>3. Decisions on whether compensatory planting would be appropriate should be considered as part of the normal consultation / existing felling licence processes.</li> <li>4. The issue should be a standard part of any projects which involve woodland removal.</li> <li>5. It is important to consider the wider issues relating to timber production and our reliance on imported timber. This includes consideration for forward planning and ensuring we can meet our needs for the future.</li> </ol> |
| <p><b>Factors to consider when deciding which policy is likely to work best</b></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>No specific changes requested or noted from RAC Members.</p>   |   |
| <p><b>Implications for delivery mechanisms</b></p>  |   |
| 23.   | <p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>  |
| <p>RAC Members noted the important link between Environmental Stewardship and EWGS and the working relationship / interface between the Forestry Commission and Natural England. It was felt that further work on how to integrate the support mechanisms would be beneficial. Also consideration for any delivery implications relating to new RDPE programme (post 2013). It would be appropriate to consider some outline scenario planning for different outcomes under RDPE such as increased, reduced or the same funding levels.</p> |   |
| <p><b>Other comments</b></p> <p>We welcome your input on any other aspect of this consultation.</p>   |   |
| <p><b>No specific comments</b></p>  |   |

Please include the "information about you" form with your response.<sup>1</sup>

**Please send your completed forms to:**

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<sup>1</sup> See [www.forestry.gov.uk/england-openhabitats-consultation](http://www.forestry.gov.uk/england-openhabitats-consultation) for a copy.

**By 17.00hrs, Friday 5 June 2009.**