Forestry Commission England

Restoring and expanding open habitats from woods and forests in England:

summary of responses to the consultation.

July 2009

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1 Introduction

We in the Forestry Commission (FC) are developing Government policy on restoring and expanding open habitats from woods and forests in England. See www.forestry.gov.uk/england-openhabitats for further details.

The document summarises the responses to the consultation on the proposed policy options. It represents step five in the nine step process being followed (Section 10).

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2 Background

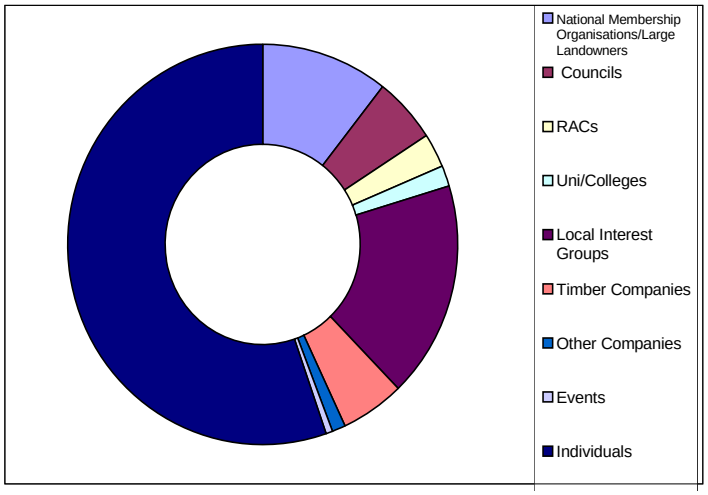
The consultation was launched on 12th March 2009 and closed on 5th June 2009. All the documents associated with the consultation process can be found at www.forestry.gov.uk/england-openhabitats-consultation.

The consultation was part of a process we are leading to develop policy on restoring and expanding open habitats from woods and forests in England. We have adopted an open approach encouraging stakeholders to participate and working closely with Department of Environment Food and Rural Affairs (Defra), other Government departments such as Department for Energy and Climate Change (DECC) and Natural England.

We need to develop a clear policy to enable effective decision making about when it is right to remove and when it is right to retain woods and forests on land with potential for open habitat restoration.

The consultation asked a number of specific questions and invited more general comments on all aspects of the policy. Below we summarise the responses to the consultation starting with an overview and then focussing on each question in turn.

3 General summary of responses.



Information about the consultation was sent to a wide range of stakeholders and the consultation was publicised on the internet, via press releases and a number of forums. This resulted in 223 responses. Of these responses 20 were from national membership or other large organisations including National Trust, Confederation of Forest Industries (ConFor), Royal Society for the Protection of Birds (RSPB) and Country Land and Business Association (CLA). A further 10 were from local councils, five were from Forestry Commission Regional Advisory Committees (RACs)[1], and one response was collated at a Natural England event held in the North West of England. A further 12 came from businesses, with 10 of those from the timber industry. Three educational institutes replied and 33 responses were received from local interest groups including 2 Local Access Forums. The remaining responses came from individuals including three people who identified themselves as Forestry Commission employees.

Thirty of the individuals stated they were RSPB members responding to an RSPB campaign letter to members with a further 83 appearing to use a similar template. Of the 10 timber industry responses five were from companies that appeared to use a template produced by ConFor.

The Young Pioneers[2], a charity working to engage young people in civic society, trained a team of 10 young people who ran workshops with their peers in schools and youth centres. They gained and collated the opinions of 318 young people aged from 12–19 years old, from a diverse range of backgrounds.

A list of responders can be found at www.forestry.gov.uk/england-openhabitats-consultation.

The findings show general support for the development of this policy, whilst highlighting a variety of concerns centred primarily on issues related to the timber industry, climate change and carbon sequestration and the reliability of baseline data.

Below we focus on each question in turn. For clarity, this is structured to mirror the consultation document.

[1] Forestry Commission Regional Advisory Committees are appointed by the Forestry Commissioners under the Forestry Act 1967. Their main function is to advise the Forestry Commission on a range of issues including the implementation of policy in the regions and development of Regional Forestry Frameworks.

[2] http://www.youngpioneers.org/

4 Evidence

In this section we set out our analysis of the evidence about the impact of the change that the policy will direct and the nature and possible magnitude of that change.

We asked:

Question 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?

There were wide ranging views expressed in response to this question.

Forty-four responders advocate the minimum possible level of intervention, citing concerns regarding:

- Climate change – "woodlands play a role in mitigating the effects of climate change by, for example reducing soil erosion, alleviating flooding and providing shade" (England Forest Industries Partnership (EFIP))
- The amount of woodland removal that has already taken place (ConFor)
- Impact on the timber trade "any reduction in forest cover will reduce the availability of wood raw materials for the wood processing industries" (AJ Charlton)
- Financial pressures – "Our key concern is how will the programme be funded bearing in mind the pressure on future public funding" (West Midlands RAC).

The study by the Young Pioneers highlighted concerns about the scale of restoration from 87% of young people who took part in the survey. This could be due in part to the perceptions held about deforestation and what they see in the media about areas such as the Amazon rainforest. They gave impact on climate change as the most worrying aspect of the policy which may have also influenced the response gathered by the Young Pioneers.

From nine responders there was concern about the assumption of a certain level of deforestation in the question and this was not thought to be an acceptable starting point for the consultation. Indeed there were calls for both no net deforestation and an extensive afforestation policy leading to increased woodland cover in England.

Conversely, 15 responses felt the annual level of intervention would need to be higher than the 30,000 ha given.

- Agreement with this view focuses largely on the biodiversity benefits associated with the restoration and expansion of open habitats
- For example, the RSPB "supports the long-term UK Biodiversity Action Plan (UK BAP) aim to double the current area of lowland heathland in England". This sets a figure of 55,000 ha, the majority of which is expected to be realised through the restoration of areas currently under plantation forestry.

- "It is essential that no less than the maximum figure should be adopted" believes Dr Lesley Haskins, stating a wide range of landscape, cultural and recreational benefits associated with open habitats as explanation.
- Another response states that the full 130,000 ha of potential open habitat under woods and forests identified should be restored to open habitat but over the full plantation cycle. It says this will still not compensate for the area lost to plantation forestry and successional woodland during the 20th century.

The Herpetological Conservation Trust (HCT)/Froglife offered a response in which they recognise that whilst the upper level of restoration may be difficult to achieve there should be ambitious targets underpinning the policy. Sherwood Forest Trust and Sherwood Habitat Strategy Group share the desire for challenging targets. Thirty-six of the responses from the individuals using the RSPB, or similar, template specified using ambitious targets to maximise the expansion and restoration of open habitats.

Natural England is less concerned by the short-term targets but support long-term restoration of an area at the upper end of the scale identified.

The Wildlife Trusts state "open habitat creation should be in line with the delivery of BAP targets". This is a view supported by six further responses that also highlight current BAP targets and say that the lower end of the scale would not support the agreed restoration figures.

Several responses said open habitat restoration and expansion should not be target driven but cases looked at on an individual, site by site basis. For example, Exmoor National Park Authority (NPA) "would prefer no targets but take opportunities based on broad environmental assessment". The sites managed by the Ministry of Defence - Defence Estates "have aspirations already set up within Public Service Agreement targets" and as such are not in a position to agree to a set figure. Flexibility was a recurring theme in this type of answer, as was the need to look at broader landscape-scale impacts to determine the level of intervention appropriate.

Another concern regarding targets was raised by the CLA, highlighting the role of the individual landowner in land use decisions. "There must be no compulsion on private land owners to remove woodland to meet any targets this policy sets".

Norfolk Biodiversity "believe that it should be possible both to increase the area of forests and woodland in England whilst simultaneously increasing the area of open habitats".

The responses based on the RSPB members campaign called for ambitious targets for the restoration of heathland and other threatened open habitats with restoration targeted to areas that will ensure the best outcomes for wildlife.

5 What we want the policy to do

In this section we set out the desired outcomes of the policy and how we propose to measure success.

We asked:

Question 2: Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?

Of the people who answered this question 73% agreed that the list of desired outcomes was reasonable with many also offering amendments to one or more of the desired outcomes. 19% disagreed with the suggested desired outcomes and the remaining 8% of responses suggested amendments but presented no view as to the overall effectiveness of the list.

Below we look at each of the desired outcomes separately and summarise the main amendments put forward. The outcome statement proposed in the consultation is shown at the start of each section.

1. **Ecological communities able to cope with threats:**

"Ecological communities including open habitat species that cope with threats so that biodiversity is not lost. There are several threats such as development, pollution, and non-native invasive species, but the main threat is climate change. This is the key desired outcome that might lead us to support the removal of woodland or forest to restore or expand open habitat."

In the text accompanying this outcome, the main threat faced by ecological communities was highlighted as climate change, a view no responses challenged. Indeed, the Woodland Trust suggested that due to the potential impacts of climate change "sustainable adaptation to climate change" should be included as a separate desired outcome.

Concerns centred on the difficulties associated with defining and measuring this outcome and that it should be deemed a bare minimum provision. Another potential problem is that achievement of this aim "depends to a very large extent on how the open land is subsequently managed and on the habitat structures that develop. This suggests it will not in itself act as a valid outcome of this policy in isolation" (British Trust for Ornithology (BTO))

The CLA added "If the main threat to ecological communities is climate change it is important that the policy should not in any way further contribute to climate change or impinge upon the role woodland can play in mitigating climate change".

2. **Financial viability**

"Landscapes do not require frequent injections of external resources to fund remedial works and that any long-term call on public funding, such as agri-environment grants, is within manageable limits."

It was suggested that the long-term viability of the management and on-going costs of open habitats should also be included in this outcome. This would require a monitoring programme to assess impact. The Small Woods Association suggested consideration should also be given to "the income foregone by removing recent native woodland or young conifer plantation, which can be expected to rise with the developing woodfuel market" within this section.

The CLA advocated considering "the benefits the money could buy if spent elsewhere in the forestry sector" prior to committing it to an open habitat restoration policy.

3. **Keeping to Government commitments on woodland cover**

"The UK Government is able to show that England fulfils its international commitments to sustainable forest management, especially maintaining net woodland cover."

Two differing viewpoints were seen in response to this outcome. The first was that keeping to current Government commitments to woodland cover should not be a desired outcome. It was felt this could limit the amount of restoration undertaken and so be a constraint on this policy. Meeting these commitments is dependent upon factors outwith this policy and therefore should be considered separately. (Woodland Trust).

The other viewpoint was that "it is not enough to maintain net woodland cover, we should also be increasing woodland cover by planting more productive woodland" as advocated by the Small Woods Association and CLA among others.

4. **Positive engagement by local and other users**

"People's positive engagement in the landscape they use, particularly their local landscape, is maintained or enhanced."

It was suggested that this element should also include increased public awareness and education. In question 7 of this consultation we asked whether local participation in the decision making process would be helpful. A large majority (96%) of responders felt that local participation should be an element in the process. This is analysed further in the responses to question 7.

5. **Carbon balance**

"Woods and forests continue to make an appropriate contribution to the UK Government's commitments for reducing carbon emissions."

This outcome caused some discussion about what degree of carbon sequestration constituted an 'appropriate contribution'. It was also suggested that woodland should be managed in such a way as to make increasingly positive contributions to carbon balance.

Following on from this, Worcestershire & West Midlands Wildlife Trusts feel that this outcome should be strengthened and better defined in line with the tougher targets on carbon emissions agreed by the UK Government.

6. **Timber sector activity**

"Any reduction in timber production has little impact on confidence in the harvested wood products producing and processing sectors and economic activity in the sector is not significantly reduced."

EFIP feels that a more defined statement is required, especially regarding what reduction in timber sector activity would be deemed acceptable and what would be classed as 'not significant' impact, as described in this outcome.

The UK Forest Products Association (UKFPA) on the other hand demands "no reduction in economic activity as a consequence of the proposed measures".

The amendments suggested were not just about economic activity within the sector but also in relation to the contribution it can make towards climate change mitigation through product substitution and renewable energy.

7. **Woodland Biodiversity**

"Any improvement in trends in key species associated with native and non-native woodland habitats is not compromised."

It was suggested that this outcome should include trends in the biodiversity of open habitat as well as woodland. In addition it was suggested that assessment should be at a landscape scale rather than on a site by site basis, as the species associated with secondary woodland are often more mobile than open habitat specialist species and therefore able to recolonise other areas more easily.

As well as amendments to the desired outcomes set out in the consultation document, suggestions for additional desired outcomes were welcomed. These included:

- "There should be an additional outcome on achieving the restoration of priority open habitat targets under the BAP. This issue is covered in the rationale and through the indicators, the latter being concerned with recording area restored and how well species are recovering. However, given that this is a policy on restoration, it merits the headline outcome to drive the agenda." (Natural England). The relationship with the BAP and associated targets is also suggested by a variety of other responses including the Woodland Trust, Staffordshire County Council and Nicola Rivers.
- A separate outcome addressing the restoration of all semi-natural open-ground habitats planted with non-native conifers, where sufficient remnants of the original habitat survive and their future management can be sustained. (Woodland Trust)
- An outcome relating to the historic environment was also suggested by several organisations; "Include outcome not to compromise the historic environment and increase learning potential." (Association of Local Government Archaeological Officers). "Should include preservation of historic landscape, possibly an ancient scheduled monument study" (Devon County Council). "People reconnected to their cultural heritage by encouraging learning about the history of the landscape and the role their ancestors played in it." (Staffordshire County Council). "Also include cultural landscape and heritage" (J White).
- Habitat connectivity was suggested of worthy of a separate desired outcome by Norfolk Biodiversity

→ HCT/Froglife believe the desired outcomes outlined miss the main driver for the policy which are the biodiversity and landscape benefits of open habitats and that these should be an explicit desired outcome.

The UKFPA consider the list of desired outcomes to be reasonable, although feel further detail is required before they can be fully accepted or challenged.
In contrast the RSPB and HCT/Froglife both feel that the outcomes have been based on perceived negative rather than positive benefits associated with open habitats. Desired outcomes list one generic positive environmental outcome likely from open habitat creation and six other more detailed outcomes that could be damaged by open habitat creation. This provides an unbalanced list of outcomes with a built-in likelihood of a negative measure of success for open habitat creation." (The Wildlife Trusts).

We also asked:

Question 3: Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?

Opinion was divided about the set of indicators put forward. One half of responders (50%) thought the set of indicators for evaluation was reasonable, although several of these replies included amendments. Also offering amendments were 46% of responses that were not content with the list of indicators. The remaining responses did not give an overall appraisal of the indicator list but did give amendments.

1. Ecological communities able to cope with threats

"i. Rate and area of restoration and expansion of open habitats from woods and forests."

"Without the rate of restoration indicator being broken down into habitat type, with indicators (or sub indicators) for each, one or two of the larger habitat types could dominate the policy. If there is just one indicator, progress, or otherwise, on the rarer open habitats could receive less attention than the larger target habitats," suggest Natural England.

If rate of restoration is going to be used as an indicator, it would be useful if it distinguished between the area restored from areas previously planted with non-native conifers and those restored or expanded from other land uses. (Woodland Trust)

"ii. Trends in open habitats that can be restored from woods and forests."

Population numbers are likely to fluctuate as a result of climate change and so judging the effect of restoration in isolation will be difficult. Natural England suggests that this or an additional indicator should monitor the structural diversity and ecological process instead. This will also provide comparative data over the long term.

Again in this question BAP targets were suggested as an indicator of success of this policy and its contribution to wider Government policy. It was felt the role

of UKBAP species in this would need to be investigated further to ensure inclusion was appropriate. (Shropshire BAP). Lincolnshire Bird Group also suggests the use of BAP species but feel the policy should "use woodland BAP species as well as open habitat species". "Monitoring should not just be for open habitats. Need to see trends in woodland species too to assess whether open habitat creation has had negative effect on woodland species." (Bat Conservation Trust)

The North West RAC added a note of caution to the generalised nature of indicators - "The landscape ecology approach is helpful but generalised indicators should not be allowed to drive the monitoring process. For example, greater connectivity in the landscape may inadvertently lead to pathogen or alien species spread so should not be assumed to be always a desired outcome. Any such indicator on patch size and connectivity must be species or habitat specific and take the wider landscape into consideration".

2. Financial Viability

"i. Percentage of open habitats restored from woodland and forestry with Higher Level Stewardship or other equivalent resourced management plan in place. "

Dr Mike Render pointed out that "the existence of Higher Level Stewardship or other support does not indicate viability but purely that public money is being invested". It was also suggested that this indicator should take in to account the 'trend of public funding of open habitats in comparison to original forested land'.

East England RAC feel that this indicator should also "look at the cost of supply of saw logs to local mills, where the supply will come from, how sustainable it is, what is the effect on confidence in the milling industry. It should also look at costs involved in reduced potential of woodland for recreation". Tilhill Forestry continued along these lines with their suggestion of "identifying the cost in managing open habitats as opposed to managing a commercial forest. This will help the review and impact of any revision to the levels of future open ground creation through deforestation".

One other suggestion in this section was to include a measure of how many new job opportunities have arisen as a result of open habitat restoration or expansion. (Natural England)

3. Keeping to Government commitments on woodland cover

"i. Net change in woodland cover."

EFIP highlighted that current figures on deforestation rates are "not robust" and so question how this indicator could be used.

4. Positive engagement by local and other users

"i. The number of Environmental Impact Assessments (EIA) for deforestation associated with restoration of open habitats where local concerns are identified as an issue at scoping stage."

It was felt the indicators for this element should focus on successful as well as unsuccessful engagement. "The wording of this indicator suggests only negative

reactions will be measured, with no attempt to balance positive user reaction." (RSPB)

"ii. The number of EIAs which are referred upward for resolution."

There was variation in the replies that addressed the role of the Environmental Impact Assessment (EIA) process:

"Engagement with local users could be much better assessed by their involvement in the EIA process rather than just where concerns are identified as an issue" (Dr Mike Render).

In contrast to this view, Yorkshire and the Humber RAC believe that "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 stakholders".

5. Carbon balance

"i Percentage of projects that adopt low emissions techniques during restoration.

ii Change in long-term average carbon store.

iii Change in fossil fuel and product substitution benefits."

The carbon balance indicator "must include all aspects including carbon store for specific area not just blanket woodland figure" suggests Nigel Symes. This view supports site by site analysis and decision making.

Several responses viewed the carbon balance theme associated with this policy as complex, requiring more research to develop robust and reliable methods of evaluation. Such responses tended to point out that it will be difficult to develop indicators in the short-term that are able to fully represent the whole scenario for each project.

6. Timber sector activity

"i. Change in production forecast due to policy at regional and national levels.

ii If feasible, an indicator from the survey of business confidence."

Yorkshire and the Humber RAC feel that "the timber sector are likely to want to know the impact on productive forest area as well as forecast volumes".

7. Woodland Biodiversity

"i. Loss of established native woodland due to restoration or expansion of open habitats."

Lincolnshire Bird Group feel this "indicator is too restrictive. Significant woodland biodiversity is associated with certain non-native woodlands. The reference to 'native woodland' should be expanded to include other woodland of established high biodiversity value". The biodiversity value of woodland, other

than established native woodland, is seen as still important and any loss will have an effect on woodland biodiversity.

On the other hand the Wildlife Trusts believes that "the stated indicator for biodiversity is biased against open habitat. This sets up a measure where loss of woodland key species would be recorded but improvement in populations of open habitat key species would not. It also pays little regard to survivability in the wider landscape – key woodland species may be lost from the particular compartment when cleared of trees but population levels could be maintained in the wider landscape. Heathland species, by contrast, are more likely to be limited to key heathland habitats and restoration areas."

The use of species indicators was suggested to give more meaningful measures of biodiversity. This could include the use of the BARS (Biodiversity Action Recording System) system in conjunction with the recording of National Vegetation Classification type in this indicator, as some are inevitably more valuable than others.

The Woodland Trust suggested using existing indicators as a measure of policy success, rather than developing new ones, giving the example of "the indicator of landscape connectivity that Forest Research are currently developing for Defra with regard to 2010" as one possibility. Exmoor National Park Authority felt that in general the indicators for evaluation outlined in the consultation document needed to take "more account of local indicators".

South East England Wildfire Group wished to see an additional indicator included "on the 'net change on natural hazards' including effects of wildfires, flooding and high winds/storms" to represent their concerns, particularly about increasing fire risk.

EFIP believe that before any measures or targets can be set "there should be robust benchmarks/baselines for all indicators". Norfolk Wildlife Trust also highlighted the need for easily measurable indicators as they think "many of the indicators measure processes and cannot be used to identify if a desired outcome is being met".

Another responder, Chris Marrow, believes that the indicators for evaluation "need to be set and seen against parallel sets of indicators relating to efforts to sustain existing open habitats when in good condition and efforts to improve existing open habitats when in poor/declining condition. Both are higher priority than creating more open habitat from multi-benefit productive forest".

6 Policy proposals

In this section we proposed six elements that we judged should be present in the policy, three key variables, the balance of which would determine the final policy and three different approaches to applying policy.

6.1 Elements present in the policy

6.1.1 We will treat woodland and open habitats as potentially mutually beneficial

The approach proposed recognises the potential for woods, forests and open habitats to be mutually beneficial. Some examples include, a mixture suiting some species more than others, enabling effective management of recreation pressure, the transition between open habitat and tree cover being important, and the use of forestry to offset some of the costs of open habitat management.

We asked:

Question 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?

The majority of responders to this question (78%) agreed with the statement that woodland and open habitats are mutually beneficial. Plantlife highlight the importance of distinguishing between different types of woodland. They believe that “from a botanical viewpoint, the interface between woodland (of the right type) and open habitat is perhaps more valuable in calcareous grassland situations - recognising that species such as Lady Orchid (*Orchis purpurea*), Fly Orchid (*Ophrys insectifera*) and many other 'woodland' species are indeed more typical of well illuminated margins of woodland”.

Thirteen responses, or 19%, whilst agreeing in principle to the statement, felt it important to consider the benefits on a site by site basis rather than using a broad-brush approach. For example Natural England say “In principle we agree as this will increase structural variation and will be good for biological diversity and adaptive responses to changing climatic conditions. However, this does depend on the site, its scale and it is habitat and site condition specific”.

Dorset Wildlife Trust were one of the responders against the above saying “No, based on the direction the question is leading – i.e. towards patches of open habitat within continued monoculture dense conifer plantations. We agree that a vision of open habitats that are not totally treeless would provide a picture, which is more realistic of landscape-scale conservation aspirations. We would want to see these trees and wooded areas adding to biodiversity rather than being remnants of old style forestry which offer little biodiversity benefit and fragment and isolate other habitats.”.

The second part of this question asked about the use of the concept of mutually beneficial woodland and open habitat to gain support for the restoration and expansion of open habitat from woodland. Backing was given to this idea by 40% of people who answered the question including High Weald Area of Outstanding Natural Beauty (AONB) who said “Public perceptions of this have to be managed carefully and promotion of the idea will be necessary in gaining support for open habitat restoration and expansion”. The Ministry of Defence - Defence Estates think “Promotion of mutual benefit will make it easier for landowners to accept.”.

The other 60% of replies did not agree and questioned the desirability of using this idea to gain support for the restoration process. Hurn Parish Council feel that "If the concept of open habitat restoration is valid then it should not be necessary to "push" for support, a straightforward factual explanation of the 'mutually beneficial' case, should suffice". Members of the public are then able to make up their own minds to support or oppose the policy".

We then set out a presumption against removal of mature native woodland and reaffirmed the commitment to avoiding loss of ancient woodland.

We asked:

Question 5: Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?

The vast majority (96%) of responders to the consultation supported the presumption against removal of ancient and 'mature' native woodland.

Natural England agreed with this presumption without precluding "existing good practice being followed on open ground and ride management within woodlands, which can support priority open habitats and species in places".

This support was mirrored the results from a survey of young people conducted by the Young Pioneers. They found that 72% of their 318 participants agreed that mature native trees should not be removed for the restoration of open habitats.

Two (Hurn Parish Council and Exmoor National Park Authority) support the presumption being changed to "British native woodland" to include mature Scots Pine in the South of England. Ten replies sought to extend the presumption against removal of any trees at all, including and especially commercial conifer crops.

Fourteen replies indicated the need for flexibility with the presumption and sensible application. For example, North York Moors National Park Authority feel "that retaining all 'mature native' might be too prescriptive and can foresee situations where removal might be acceptable without loss of biodiversity". Staffordshire County Council whilst broadly supporting the assumption would not like to see small fragments of Ancient Woodland left after felling of the surrounding non ancient woodland.

The BTO also broadly agrees with this presumption and highlight two further considerations. One is the need to maintain open habitats within ancient or 'mature native' woodlands in the form of rides, glades and, where appropriate, through coppicing, which is important for biodiversity conservation. The other is the "need to recognise that some young woods are of considerable value in their own right e.g. coppice rotations and young wet woodland.". The Woodland Trust included the importance of retaining key ancient wood pasture in their response.

The Bat Conservation Trust feel this presumption should be extended "to areas of woodland known to support species of bat listed under Annex II of the EU Habitats Directive, many of which are woodland specialists that require large areas of closed canopy woodland".

We proposed a draft definition of mature native woodland:

- *"all ancient woodland sites regardless of the age of the current trees and their native or semi-natural status on the site;*
- *sites currently composed of native broadleaves that have been wooded for at least 80 years; and*
- *sites where the current native broadleaved crop is at least 80 years old (pre-Second World War) and has been closed canopy (>70%) for at least the last 20 years."*

We asked:

Question 6: What do you think of our proposed outline definition of "mature native woodland"?

In general terms, there was support for the definition of "mature native woodland" as set out in the consultation document and for use in this policy only. Fifty responses supported the definition with nine showing concerns regarding this.

"Making a declared presumption against removal of a tightly defined woodland type (except ancient woodland) is not likely to be especially helpful. It is going to be relatively hard to re-establish open habitat from long established deciduous woodland in any event - and if anyone proposes it, it is likely to be because there is a very important open habitat to attempt to restore." (Dr. Lesley Haskins).

Many of those supporting the definition do also suggest that flexibility is required within it. The response from Staffordshire County Council is representative of the 13 responses sharing this view "In general terms, this is acceptable, but an assessment of woodland and surrounding habitats would indicate if there were good justifications for partial or complete removal. There may be circumstances where areas of native woodland 80 years or over, lying over open habitat could be removed or partially removed to restore a critical link between larger, but fragmented open habitat. 80 year old even-aged birch developed on former open land such as heathland or bog may be included in the definition of mature woodland, but may have low biodiversity value compared with other areas of well established woodland with a developed structure and ground flora.".

This flexibility applies to very specific local priorities as well as broader landscape or national ones. For example, the North West England RAC in their response highlight the need for "mature conifer stands for the red squirrel population. The policy needs to enable local decisions to be taken".

Some amendments to the definition were suggested including taking into account ecosystem functions and species present in a woodland, rather than concentrating solely upon physical characteristics (Bat Conservation Trust). Lincolnshire Bird Club would also like to see the definition look at more than just

the age of the trees to incorporate current or potential biodiversity value for both the existing woodland and the open habitat(s) which will/may replace it.

The East England Biodiversity Forum (EEBF) think that the "'at least 80 years old' criterion is a pragmatic approach." However, others disagree about the age of the woodland that should be counted as mature. For example, Exmoor National Park Authority feels that "80 years is too high a threshold. In some cases a 40 or 50 year native woodland has "matured" so as to possess significant biodiversity and landscape values." This is supported by three other responses, while two others think it is too low.

The EEBF also has some concerns about the ">70% closed canopy" criterion, which they feel may inadvertently lead to loss of valuable developing wood pasture sites. They feel it may be more appropriate to use the accepted definition of woodland which stands at >20% canopy.

HCT/Froglife also pick up on the exceptional circumstances mentioned and suggest that examples of such circumstances should be given to provide more guidance. They suggest these may include areas where habitat linkage is important. In their response Natural England give such an example "In the case of some birch on drained peatland or with other wet woodland. In these exceptional circumstances the relative values of maintaining the woodlands or restoring the open habitat would need to be assessed on an individual site basis".

6.1.2 We will expect practitioners to help local users to participate in development of the initial proposals

We proposed an expectation that practitioners would ensure high quality local participation in decision making about open habitat projects in the early stages of any project. We also set out a number of options for how this could be applied.

We asked:

Question 7: Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this?

The concept of local participation in decision-making being helpful received almost universal support. Seventy responses, or 96%, backed well-informed discussion and a balanced representation of views to aid community engagement early in the consultation process.

The Young Pioneer study debated the role of young people in local decision making and concluded that the best way to engage with this demographic was to develop learning materials appropriate to the curriculum and run a school project around the subject. This would give the students enough information to make their own decisions as a part of the consultation process.

There was however some divergence of views with regard to how this element should be applied.

→ **Option 2** *'We could adopt a softer approach and encourage high quality engagement to reduce problems later'* was the least popular choice with 6%,

Natural England felt that this option was "not strong enough given the difficulties that can arise".

- **Option 3** *'We could require initial stakeholder analysis and a commitment to proceed accordingly'* received support from 22% of responders to this part of the question, the second lowest.
- 34% of responders thought **Option 4** *'We could contribute to helping practitioners deliver this element of policy, for example, develop guidance and commit funding'* was the most useful for encouraging local participation in the decision making process.
- **Option 1** *'We could insist on evidence of high quality engagement before we consider proposals*' received the greatest proportion of the support from responders to this question with 38% favouring this approach. Contrary to this Natural England felt it may "devalue the process" if applied to every proposal.

Combinations of some or all of the options were also suggested to apply this element in the most effective way for local circumstances. Some comments related to the scale and impact of the project, leading to the appropriateness of each option being considered against the site-specific criteria.

6.1.3 We will promote mechanisms for prioritising woodland removal at a regional level

We proposed an approach that involves a national policy framework with mechanisms for regional prioritisation.

We asked:

Question 8: Do you agree that prioritisation at a regional level is appropriate for this policy?

Regional prioritisation, and therefore some flexibility within a national framework, was considered important and desirable by 83% of responders.

Natural England supports this view and refers to other delivery mechanisms to assist the process. "We support the need for the delivery of this policy to operate through a national framework that is subject to regional flexibility and prioritisation. The national England's Trees Woods and Forests Delivery plan and its intended interpretation through Regional Forestry Frameworks (as they are updated) proposes such an approach, and we believe an equivalent model should be followed".

An example of the importance of this comes from the North Pennines Black Grouse Recovery Project. They state "A strategic approach should be adopted at a regional level to deliver this policy as black grouse are only found in the uplands in the North East, North West and Yorkshire and the Humber Forestry Commission regions".

The RSPB, whilst generally supporting regional prioritisation, did not agree with the example set out in the consultation document where prioritisation was based on existing woodland cover.

ConFor suggest that “in larger regions it may be necessary to allow for sub-regional priorities”. Ten other responders including the Wildlife Trusts and Dorset County Council support the use of smaller areas e.g.: counties, for the development of priorities.

The 13 responses that were opposed to prioritisation at the regional level primarily based this upon the need for keeping the national picture consistent and ensuring decisions are made using a common approach. There was also concern regarding different potential for restoration and expansion in different regions.

SH Marston Forestry notes a preference for a bottom up rather than top down approach to prioritisation.

6.1.4 We will apply a framework for evaluation to projects

We proposed that practitioners would engage in a framework for evaluation and set out various options for how this could be applied.

We asked:

Question 9: Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?

The use of the framework detailed in the consultation document was supported by half of the responders. Additional responses highlighted the need for the adoption of a standard framework but thought that the one outlined was too linear and did not allow enough for feedback. “Its essentially linear nature does not appear to allow feedback and management to be adjusted as experience accumulates and (hopefully) information is gathered through research and monitoring.” (BTO). It was also suggested that the framework needed to be more user friendly to engage landowners and not put them off the process.

The other main problem with the framework, highlighted by six responders, was the use of the word “Problem” as the starting point. It was considered more suitable for this to be changed to “Issue” or “Challenge”, as not everyone would view the situation in the same way.

Opinions differed on how this element of policy should be applied. Option 3 ‘Encourage use of the framework’ was not seen to be workable in isolation from at least one other of the options given. A typical example came from Natural England “Where funding is not the driver, encouragement should be given and guidance to support this would be helpful. Our view is that options 2, 3 and 4 all have merit”.

Four responses thought the framework should be imposed on all projects, although the CLA would only support this on the Public Forest Estate, with those projects on private land having its use as a condition of funding. Nine other replies also encouraged the use of the framework as a condition of funding (option 3).

The most popular method for applying the framework was option 4, which involved the development of guidance to support practitioners.

Lancashire County Council suggested an alternative of aligning the framework for evaluation "with the requirements of the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 in order to demonstrate consistency of approach to deforestation".

We asked:

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?

The provision of written guidance and technical support was the most common suggestion to provide support to practitioners for the evaluation of projects, with 26 responders choosing this as an example. Natural England offered support to the Forestry Commission in development of such guidance based upon experiences with creating county heathland recreation plans and the associated scoring systems.

The next most popular method of support was the availability of financial support, suggested by 13 people. Two people also suggested training events for practitioners to attend to gain confidence in completing their part of the process.

The UKFPA recognised that "support will be required but it is difficult to know how much at the moment". Calls for more detail before commenting were also received from two other organisations.

In contrast, six responses thought that no support should be given to help practitioners and the costs should be borne by the practitioners themselves. In response to this question the CLA responded "The cost of carrying out this evaluation is another additional cost over retaining the area as woodland therefore it is a cost the proposer should expect to bear".

Another suggestion, from Dorset AONB, was to engage and utilise existing delivery mechanisms e.g. Dorset Woodlink to aid practitioners in their delivery against indicators. Along with this, the development of "a scoring system for assessing projects based on the framework could assist, though it may need to be tailored for different habitats. This has already been attempted when developing some of the County heathland re-creation plans, with projects scored/prioritised depending on: size, soil type and characteristics, remaining open habitat present, time since habitat was afforested, practicality of management as open habitat etc." was suggested as a way forward by Natural England.

6.1.5 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

We proposed a mechanism for avoiding net deforestation in England and set out various options for how this could be applied. We also set out that 1,100ha per year was our current calculation of the maximum rate of woodland removal for open habitat restoration above which net deforestation in England could happen.

We asked:

Question 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?

An England scale threshold was considered appropriate by 58% of responders including:

- → "A threshold level of woodland removal will be critical if national (as well as regional) commitments to sustain and where possible expand woodland cover are to be met. This threshold must not be wrongly interpreted as a target for woodland removal. Should also have regional/sub regional thresholds too." (North West RAC)
- → "It is essential that there is no net loss of productive forest cover in England as a consequence of the restoration/expansion of open habitats. Compensatory planting must be guaranteed. An England-scale annual threshold rate for removal is desirable." (EFIP)

42% of the responders oppose the principle of a threshold. The reasons for this vary but generally fall in to one of three categories.

The first is that having a threshold would restrict the amount of restoration completed.

- → "Setting such a threshold may limit opportunities to restore key UK BAP open habitats, therefore is not supported" (Staffordshire County Council).

The second that there should be no loss of woodland.

- → "Any threshold of deforestation must ensure that there is no net loss of woodland cover in England, already one of the lowest coverage's in Europe". (Tilhill Forestry)

Finally, four responses included the wish for positive targets for open habitat expansion and restoration, rather than a threshold for woodland removal.

- → "There should be no threshold for woodland removal – instead positive targets should be set. We should be trying to meet both biodiversity and woodland cover targets with expansion of planting of native woodlands in appropriate places". (Environment Theme Action Group, East Dorset)

Other ideas included one from Chris Marrow, which suggested "A compensatory land exchange mechanism operating at regional level is preferred. It offers the greatest safeguard against net deforestation over time, and could operate within the context of a regional woodland creation/afforestation framework to help reposition forests to address modern agenda priorities. Financial compensation or linking reversion to planning gain in some way (e.g. Section 106 agreements) would also seem appropriate if not necessary".

Again in this question the need for flexibility was highlighted. Natural England would not wish to see any threshold "applied mechanistically to prevent restoration proposals. Our view is that we would wish to see this principle applied but balanced over time. We also agree that the threshold needs to be considered at the regional level".

There was also a call for regional rather than national thresholds from Lincolnshire Bird Group, East England RAC and the Small Woods Association.

We asked:

Question 12: Do you consider that the proposed threshold is about right, too high or too low?

Of the responses received to this question, 22 felt that the threshold was too high, 8 too low and 10 thought it was set at about the right level.

The Young Pioneers study showed 78% of young people thought the threshold was too high, 6% too low and 16% about right. This confirms the response to questions earlier in the consultation and reinforces the fact that many young people feel that deforestation has negative impacts.

Eight responses indicated that more consideration and confidence in the baseline data was needed before comments could be made about the proposed threshold. Natural England suggested the threshold figure should be reviewed later in the year after the production of more accurate figures via the National Forest Inventory later in 2009.

A further nine responses thought there should not be a threshold level. This includes the response from an event held in the North West of England and the RSPB who believe that any targets identified in the policy "should be set in line with Government biodiversity targets". Other responses suggesting that a threshold level should not be set flowed from the opinion that the policy should not be based on targets.

6.2 Key variables

We identified three key variables relevant to this policy the balance of which needed to be determined.

6.2.1 What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?

We discussed how restoring or expanding open habitats from woods and forests will help achieve biodiversity objectives but could compromise the ability of England's woods and forests to reduce the amount of greenhouse gases in the atmosphere.

We asked:

Question 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?

Suggestions of how to estimate the contribution to biodiversity objectives from restoration of open habitats varied widely from using existing measures to others that could be developed.

Staffordshire County Council suggested using existing data from organisations such as the RSPB and Natural England "to demonstrate the benefits of restoration and expansion and reducing fragmentation on habitat viability and species populations and range, through monitoring of key open habitat species. While many benefits may require long-term assessment, due to the rate of ecological adaptation and colonisation, this existing data could be used to model potential species responses to restoration related to the scale of particular projects, type of habitat restored and species concerned. Furthermore, current reporting via BARS on UK BAP habitats and species should give a picture of short and longer term biodiversity achievements."

The Bat Conservation Trust think estimating biodiversity objectives could be measured "through referencing targets set for UKBAP species and habitats affected by these proposals. Draw on existing data sets such as national Bat Monitoring Programme".

"It is possible to model the scale of benefit to biodiversity (within certain confidence limits). This has already been done for a number of taxa, including birds, using occupancy rates (not carrying capacity) and colonisation or dispersal distance. The effect of reinstating landscape scale units of open habitat could be modelled, and the impact on hydrology could also be predicted. The Centre for Ecology and Hydrology have expertise in these fields." (Nigel Symes)

"Use of spatial modelling tools such as BEETLE[3] or the 2010 indicator of landscape connectivity" (Woodland Trust).

Shropshire BAP suggest a new approach using axiophytes or plants that tend to occur in habitats that need to be conserved which "would allow estimation of the improvement in biodiversity on sites which are under restoration. Axiophytes can be divided into indicators of good quality examples of specific habitats, e.g. heathland or dry acid grassland, and can be used as a year on year measure of change. Axiophytes are judged to be a reasonable indicator of biodiversity on specific habitats i.e. a heathland site with a high number of heathland axiophytes is likely to also have a high number of other heathland specific species. It is essential to discuss the biodiversity objectives, and how to measure these, through the Local BAP process".

Advocates of a precautionary principle include the East England Biodiversity Forum who acknowledge the "difficulty of measuring the magnitude of the net benefit from given levels and types of open habitat restoration, and welcome the undertaking to commission research in this area. Given the uncertainties the Forum would advocate a precautionary principle in setting threshold scales for such restoration work".

Tilhill Forestry however do not think that this can be better estimated "The general picture on biodiversity is of recovery in many groups of species but continued decline and vulnerability in specialists. Future impacts on these species are impossible to predict or quantify, for example, development, pollution, and competition from invasive species and climate change. There are

[3] Biological and Environmental Evaluation Tools for Landscape Ecology.

large gaps in the evidence base on the net benefit from a given amount and type of deforestation for open habitat restoration. Therefore, in these times of economic uncertainty, it is not a wise use of public money to support such vague and uncertain benefits from deforestation over well-known, revenue earning, benefits that can be delivered from existing woodlands. Decisions on any further deforestation for open habitats should take into consideration the ability of the woodland to support key species through effective management, such as, thinning or restructuring, rather than removal. Deforestation should be the last resort".

Natural England felt this question was difficult to answer in detail but believe that "generally the greater the level of restoration or expansion of priority open habitat types the greater the contribution to biodiversity objectives, although some may take time to realise".

We set out some ways of reducing carbon emissions during conversion from wood or forest to open habitat.

We asked:

Question 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?

All responders to this question agreed that carbon emissions during restoration or expansion should be minimised. Some, 18%, did however propose amendments and additional considerations to those outlined in the consultation document.

Ten responders believe that there should be best practise guidance produced and in some cases responders see the adoption of this as mandatory and/or think it should be linked to the funding process.

Both the RSPB and Woodland Trust say that UKWAS (United Kingdom Woodland Assurance Standard) and the UK Forestry Standard and it's associated guidelines could have a role to play in ensuring that best practise for carbon minimisation is achieved.

The removal of brash from a restoration site was the most disputed of the four ways put forward to minimise emissions. The New Forest National Park Authority (NPA) says, "often the removal of brash may contribute significantly to the restoration of the target open ground vegetation depending on the particular situation". Others pointed out that arisings may also enrich the soil to such an extent that it compromises the efforts to restore the area to, for example, heathland. Instead of leaving in situ seven responses advocated the use of brash as biomass for energy production. Dorset AONB again highlighted the role local groups could play in this process "Local initiatives should be supported, such as [Dorset] Woodlink, which gets practitioners to work together and develop networks to encourage the use of wood fuel." Natural England also supported the use of brash and woody biomass for woodfuel. Their response also supported the position not to remove stumps and to presume against removal of those commercial crops nearing economic maturity.

"More emphasis might be placed on how the restoration of habitats is carried out on peat soils to minimise emissions and restore active carbon sequestration processes where the peat may be a better carbon storage mechanism than the trees" (New Forest NPA). The restoration of open habitats on peat is seen by some to be a special case due peat acting as a carbon sink.

Several pointed out that it is important to ensure that activities at the outset of the project do not compromise the objectives of the restoration or expansion scheme. Norfolk Wildlife Trust make this point in their response "This is a complex subject with much scope for generalisations that in effect make no difference to emissions or make the problem worse e.g. not removing stumps increases future management costs. More research is undoubtedly required".

We set out our calculation of the current potential impact on carbon emissions.

We asked:

Question 15: Do you agree that it is appropriate to include impact on long-term average carbon store *and* loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?

The majority of responders, 72%, agreed that the impact of both long-term carbon store and loss of timber for use as a substitution material should be included. The Northwest RAC have already commenced work in both areas "At a regional level the Northwest is strategically committed to being a lead region on tackling climate change and so any reduction in our long-term carbon store would be counter to our current policy environment. The region has also recently embarked on a promotional programme to encourage the use of timber as a low carbon resource of first choice (a programme called Form>Wood) and so the utilisation of timber as a low carbon product is also a regional priority".

In the main, those who disagreed with the statement did so due to the difficulties in measuring impacts accurately and the hypothetical nature of the calculations. Again the need for including the carbon storage capacity of open habitats particularly rewetted sites was raised. Natural England was among the responders who answered in this way feeling that the "real issue is to get agreement over the approach taken to measuring reduced sequestration and substitution potential".

Others, 12%, thought that some changes were needed. Two responses thought the need for context was important. For example, Environment Theme Action Group, East Dorset believe that the impact of the proposals should be put into a global context "including the role of algae and valley mires. Far more carbon management (with increased sequestration) can be achieved through changes in practice".

Finally in this section we asked:

Question 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 responses to this question were spread as to where the balance should lie.

The arguments used by 56% of responders were in favour of priority for carbon balance. For example:

- → A significant proportion of open habitat is man-made and managed, however climate change will do more to change habitats than anything man can achieve through felling. (ConFor)
- → In short, biodiversity outcomes are of importance, but the region views tackling climate change as a primary objective. (North West RAC)
- → Climate change is the long-term priority and primary focus. The Climate change impact will define what biodiversity is viable given many open habitats species vulnerability to this issue. (Anon)

While supporting the principle overall Natural England does not support the view that carbon impact should be given equal weight regardless of site. Sites should be assessed on an individual basis to allow flexibility in cases of exceptional wildlife benefit.

26% of responders thought that the balance should be in favour of biodiversity objectives. For example:

- → This policy has much greater potential to help species adapt to climate change through habitat re-creation. Whilst carbon issues are important they do not outweigh the biodiversity benefits of open habitat recreation (RSPB).
- → 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. (West Midlands RAC).
- → 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. (Worcestershire and West Midlands Wildlife Trusts).

A further 18% of responses received thought that the objectives were of equal importance and could be achieved through a combination of this policy and others.

- → "The balance lies in the synergy of the open habitats policy with other policy driven initiatives seeking to reduce carbon emissions." (Lancashire County Council).
- → "The question is not simply about trading one objective off against another. A need to address one environmental issue, should not be given as a reason not to address another." (HCT/Froglife).

→ "They need not be mutually exclusive, if replanting balances restoration of open habitats." (Dorset AONB).

6.2.2 Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?

In this section we discussed the desirability or otherwise of managing land for shifting mosaics perhaps on a thirds principle: 1/3 permanent open habitat, 1/3 permanent woodland or forest, and 1/3 temporary open habitat or woodland or forest.

We asked:

Question 17: Outside SSSIs[4], 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?

There was a great deal of support for using a more dynamic attitude to land management; with only six of 79 responses showing opposition or concerns about this approach.

→ Yes. SSSIs are currently assessed using rigid and static criteria. A more dynamic and flexible approach to land management outside SSSIs would be welcomed (Norfolk Biodiversity).

→ We broadly agree with a dynamic approach to land management where this will deliver genuine biodiversity benefits. (Woodland Trust).

In contrast:

→ No, we do not support the 'dynamic attitude' to open habitat management. The approach seems to suggest retaining 30 – 60% tree/shrub cover on open habitat. One of the biggest threats to lowland heath is loss to successional woodland and scrub and Government policy should not exacerbate this threat. (RSPB)

→ We need far more evidence that dynamic management achieves demonstrable benefits at a reasonable cost to the taxpayer. (National School of Forestry, University of Cumbria)

Natural England added that dynamic management would need to apply at the micro habitat and niche scale as well as landscape scale, to combat the structural and taxonomic changes likely to occur due to changes in climatic conditions.

We asked:

[4] Sites of Special Scientific Interest

Question 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?

The RSPB believe the approach should be developed using existing definitions "recreation of all priority UKBAP open habitats, including non designated sites should be judged against UKBAP habitat definitions and favourable condition should be assessed using common standards monitoring". More indirect monitoring was advocated by the Deer Initiative who suggested using data sets such as the Woodland Bird Index for evaluation purposes. They did however acknowledge that this may make it hard for landowners to know whether they can/are fulfilling their statutory obligations.

Thirteen responders feel that any approach developed would need greater flexibility than the current SSSI system. Lincolnshire Bird Club think that the "desired outcome(s) should be incorporated into the evaluation framework rather than fixed condition targets. Such an approach is likely to become necessary on many SSSI's as the climate changes, given variable species response to climate parameters."

In contrast West Midlands RAC "are not in favour of any modification of conservation objectives for SSSI's. Therefore would support the view that the endpoint for all restoration proposals should be judged against favourable conditions as defined for SSSI's".

Exmoor National Park Authority is not wholly in favour of modifying the conservation objectives of open habitat SSSIs. It does, however, acknowledge that "in some situations and on a case by case basis, it may be appropriate to have modified objectives that allow a more flexible management and allow continuity".

Natural England "does not think that all sites need to be or should be judged against SSSI favourable condition criteria. However, we believe that a useful way forward would be to adopt the same framework as offered by favourable condition but to use different thresholds, as with Higher Level Stewardship. It may be that the conservation objectives for some SSSI's could be modified to take a more dynamic approach, but this needs to be considered against evidence that this approach is working elsewhere and reviewed on a site specific basis: we do not support it as a point of principle".

In response to this question the Woodland Trust put forward their Glen Finglas estate as an exemplar of a more dynamic approach to land management. "The long-term vision for the estate is to provide a dynamic ecosystem of woodland and open ground managed as a wood-pasture system. Spatially explicit and species-centred approaches to the management of the site have been avoided. Instead, broad 'limits of acceptable change' have been identified. This approach extends to SSSI's on the estate whilst aspiring to maintain them in favourable condition".

6.2.3 What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?

In this section we set out some evidence about the potential impact on the timber industry. Additional evidence in the form of a report by the England Forest Industries Partnership was published on 7th May 2009.[5]

We asked:

Question 19: Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?

The consultation responses highlighted other research and studies that have been carried out over the past few years or those which are ongoing. The Wood Panels Industry Federation highlights one such study in their response. "The 2006 report produced by John Clegg Consulting, "Forecast Wood Fibre Availability and Demand in Scotland & Northern England to 2016", predicted that demand would outstrip supply for UK wood from 2008. This report did not include the massive potential increase in demand from the energy sector (especially co-firing), incentivised by the Renewables Obligation".

The South West RAC also direct attention to a study in their region, as a part of their reply. "Serious consideration should be given to the impact of woodland removal on the timber processing industry – particularly within the Region. A current study being delivered through South West Rural Renaissance, entitled "Assessing the current growing forestry resource and modelling in the SW of England" could help develop thinking in this area. We strongly support the principle that there should be no net loss of woodland cover".

Natural England, whilst not being able to provide additional information directly, believe that any influence this factor has on the policy should be based on clear evidence. They recognise that industry confidence is an important factor too.

A number of concerns and considerations were put forward:

The UKFPA highlight that "The sector is already under very considerable pressure and active deforestation would undoubtedly result in some business closures" and ConFor believes that "The forecast reduction in softwood availability from 2012 onwards can only be mitigated by maintaining the softwood resource through restocking and new planting".

The responses concerned with the potential direct negative impact on timber sector economic activity are summarised below. It was suggested this would lead to:

- → A decrease in timber sector confidence relating to continuity of the domestic supply chain
- → Increased business costs and a negative impact upon competitiveness and profitability

[5] EFIP (2009) Open habitat restoration policy and its impact on the confidence of the timber sector in England, report to Forestry Commission, www.forestry.gov.uk/england-openhabitats.

- Lack of future investment in sawmills
- Decreased availability of wood for biomass production, at a time when demand is growing
- Job losses and lack of recruitment of school leavers in to the timber sector
- Increased reliance on imported timber and timber products
- Reduced economic activity in the forest products sector; principally amongst timber harvesting and contracting, haulage and primary wood processing businesses.

The Wood Panels Industry Federation “welcome the recognition that "many of the [forestry] businesses are in rural areas where their contribution to local employment may be disproportionate”. They suggest that if the cumulative effect of significant woodland removal results in the closure of some wood panel plants, the effects on local employment, both directly and in associated industries, would be a serious consequence and further financial burden on the state.

Regional differences were shown to be a concern and the timber industry responders tended to state that they would not support the impacts of any policy being felt disproportionately within different regions. New markets such as the woodfuel sector should also be considered. This was seen as a growing market, whose contribution to timber sector activity has not yet been fully realised. For example the East of England RAC noted that “the demand for timber is increasing. Local sawmills have invested heavily and reduced supply of sawlogs could be serious. The uptake of woodfuel is also increasing in the region and demand is predicted to double the total timber production in the region”. SH Marston Forestry concurred with this saying that timber supply for heat production is already scarce. And Tilhill Forestry say that “promoting economic growth whilst reducing our carbon footprint is at the top of the Government’s agenda. In terms of market forces we are in a time of increasing global demand for timber and clean, cost-effective fuel sources with low carbon mileage”.

Not all responses felt that the developing activity in the woodfuel sector need be a problem for the restoration or expansion of open habitats. In the Wildlife Trusts opinion “wood-fuel is presented as another excuse to retain conifer plantations, which in practice are rarely used for wood fuel. In reality the removal of inappropriate woodland can and should increase the supply to the wood fuel market over a time-scale when the supply from sustainable woodland management will be built up to fill any gap”.

As shown above, not all responses to this question felt that there would be an adverse effect upon the timber industry. A number of solutions were proposed and benefits put forward.

The RSPB highlighted three practises that could be applied to any policy of restoration or expansion of open habitats, to limit the impact felt by the timber industry.

“Any impact on timber production can be offset if:

a. Plantations are felled at economic harvest age.
b. Other woodland creation is on better soils for tree growth and hence will give better yields of better quality timber

c. Timescales of restoration (40-60 yrs in total) will allow for other new plantings to mature, maintaining the flow of timber to markets".

The Ministry of Defence – Defence Estates believes that "The net deforestation level is too small to have a significant effect on timber production". However, they also also ask about the potential impact on the wider rural economy and whether this will also be considered.

North York Moors National Park Authority suggest that other industries could stem from the potential clearance of wooded areas and therefore would bring their own benefits. "Our impression in the North York Moors is that some, but not all, proposed projects are on land with poor access and support crops of low timber value which are unlikely to be restocked to commercially viable timber production in subsequent rotations. In these cases there may even be short term benefit to the timber sector in accessing existing crops which might otherwise not be harvested. Present day economic drivers are sometimes not related to continued timber production (for example upland heathland restoration and subsequent use as grouse moor might be more viable than timber production in some situations)".

Dorset Woodlink believe that "In the short term, restoration and maintenance will provide significant amounts of timber (and work) to the timber industry. Additional planting should be undertaken to ensure a continued supply. This could result in overall benefits to the economic sector".

The RSPB continue this theme by suggesting that the restoration or expansion open habitats could benefit local economies. They feel that there are employment opportunities related to the restoration of open habitats as well as wider benefits for the local economy. Those suggested are listed below.

1. "Creating jobs for open habitat re-creation work.
2. Encouraging local expenditure from outside the area from the organisations involved, on equipment, materials and local services.
3. Creating jobs for ongoing management and visitor engagement.
4. Facilitating extensive economic grazing systems.
5. Providing areas to attract tourism and its associated economic benefits, for example the high levels of visitors associated with the Dorset heaths. Re-creating wildlife rich areas can also help extend the wildlife watching season, which is important for economies heavily dependent on summer season tourism".

Finally, one respondent thought that "any consideration on economic activity should be climate change proofed to reflect threats posed on existing tree species and adaptation needs required for markets".

6.3 Different approaches to applying policy

In this section we identified three different approaches to applying policy:

6.3.1 Making sure that the land can be managed in the long-term

6.3.2 Realising the wildlife value of potential open habitat under woods and forests

6.3.3 Ensuring appropriate scale and pace of change at a national level

- We also asked about the role of compensatory planting.

We asked:

Question 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 responses given to this question varied widely.

→ Option 1 – 'Making sure land can be managed in the long-term' was supported by 25% of the responders.

→ Option 2 – 'Realising the wildlife value of potential open habitat under woods and forests' 15%

→ Option 3 – 'Ensuring appropriate scale and pace of change at national level' was seen as the best option by 13% of responders.

Further to this, a combination of options 1 & 2 was supported by 2 responses (3%) and 2 & 3 by 1 (1%). Natural England suggested the combination of options 2 & 3 as option 2 most clearly presents the driver for the policy but option 3 provides some realism over the practicalities that are missing from the other options.

The other 43% did not back a single one, or combination, of the proposed options. Problems with the system were identified. Staffordshire County Council identified "Problems with all options. Given that the development of this policy has arisen out of Government commitments to meet priority UK BAP open habitat targets, policy options that appear to be a deterrent to open habitat restoration should not be adopted. Priority open habitats should be given the same level of support and promotion as other priority habitats, such as ancient woodland". Plantlife "support the development of significant, landscape scale projects that maximise benefits in a cost effective manner, through their scale, through detailed project planning, and through focusing adequate resources onto flagship projects".

The other point of view, expressed by five responders, was that some combination of the three options could form the basis of the approach to woodland removal.

"The three approaches are not mutually exclusive but can form a hierarchy of prioritisation should funding be a limiting factor. Again, however, there is a need for flexibility. Generally, the urgent priority will be to maintain the open habitats that we have, though buffering, expanding and linking these, and creating new stepping stones is also of significant importance if we are to create a robust landscape capable of facing the challenges ahead. Again, assessments will need to be made on a case by case basis." (Devon County Council)

6.3.4 The role of compensatory planting.

We discussed the potential role of compensatory planting and set out various options for how we approached this element.

We asked:

Question 21: What is the appropriate role of compensatory planting in this policy?

Compensatory planting was considered necessary by 65% of responders, a further 12% agreed that it had a role to play but should not be essential when proposing the restoration or expansion of open habitats.

Of the responses that agreed compensatory planting was necessary, 19% thought it should be on a like for like basis, whilst 6% stated that they did not feel this was essential.

Eleven percent thought the planting should take place in the same region as the felled area, whilst 3% thought a national approach was sufficient. "It should be a condition made when removing woodland and should be based on a regional approach. The compensatory planting may be done by the Forestry Commission, by a private owner or public body/charity. If the nation can afford the active management of more open space then it can also afford to maintain and even increase woodland cover. The planting should result, over time, in a woodland at least as biodiverse as the one removed." (National School of Forestry, University of Cumbria)

Information gathered from 12-19 year olds by the Young Pioneers also showed the desire for a compensatory planting scheme, with over 80% responding positively. It was felt that the trees should be replaced within walking distance by 42% of the group, whilst 34% were not concerned where in the UK the replanting took place, as long as there was some. These results reiterate other factors such as the importance of consistency in their environment and inability to access the wider countryside.

Compensatory planting was not deemed to be necessary by 21% of responders to the consultation.

The other 2% of responses thought that the two policies should not be combined. "The two issues should be kept separate – an equivalent policy document for woodland expansion, targeted in the right places, is needed. Insisting on compensatory planting for every removal project will result in trees being planted in the wrong place (e.g. on other important open habitats) just because the applicant cannot find any suitable site at the time. At the most a requirement to pay into a fund which gives grants for planting could be imposed. Links to the Green Infrastructure agenda and the role of developer contributions in funding woodland creation and management have not been taken into account." (Dorset Wildlife Trust). The CLA also suggested paying in to a fund such as the one described above to pay for a programme of compensatory planting.

Natural England thought that there should be no formal link between projects restoring and expanding open habitats and woodland creation ones as it was felt

this might limit the amount of restoration that occurs. However, Natural England do support the encouragement of informal links between projects, especially large scale ones that use compensatory planting to ensure that there is no net loss of native woodland.

6.4 Factors to consider when deciding which policy is likely to work best

In this section we set out the criteria which could be used to help decide which policy option was best.

We asked:

Question 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? Are any more important than others?

The set of questions for informing the decision on which policy is best was seen to be reasonable by 77% of responders to this question.

HCT/Froglife support the list of questions in the main even though “the headings and implications behind the questions have very negative connotations”. The Bat Conservation Trust agrees with HCT/Froglife that “positive factors such as the delivery of open habitats targets could be made clearer”. With this in mind HCT/Froglife feel that “there should be questions that ask whether 'there are opportunities for improved public enjoyment/perception', 'is the archaeology better preserved', rather than majoring on the 'burdens'. Consideration of the policy must be in a broader and more holistic context”. Exmoor NPA, R Cartwright, and North York Moors NPA all also propose the inclusion of a question relating to benefits for landscape and amenity value.

Opposition to the questions focused mainly on the lack of data and baseline information underpinning the policy. For example, “Our Forestry Framework Steering Group has highlighted a lack of robust data in terms of genuine current loss in woodland cover, this would be a critical gap to plug if we are to get this policy right” (North West Forestry Framework) and “The baseline information used to assess the best policy option is severely lacking”. (ConFor)

The Association of Local Government Archaeological Officers suggested an additional question be included focussing on additionality. They ask “Does the policy encourage and recognise additional benefits that would or could accrue as a result of expanding open habitats? Obvious additionality could be provided by ensuring that historic environment elements were being offered more-sustainable management as a result”.

Sherwood Habitat Strategy Group thinks that “the question on long term viability should clarify that land management options should be flexible and cost effective, but still within agreed parameters to deliver biodiversity”.

With regard to the importance of each, The Deer Initiative believes that the most important questions are that that relate to woodland biodiversity and local engagement. Lincolnshire Bird Club on the other hand think that the “importance of each varies per region”.

6.5 Implications for delivery mechanisms

In this section we set out the implications of policy for several delivery mechanisms available to Government:

- Public funding –English Woodland Grant Scheme (EWGS) and Higher Level Stewardship (HLS).
- Adapting the way legislation is implemented – felling licences, Environmental Impact Assessment (EIA), management of land with statutory conservation designation, and mapping of Open Country under Countryside and Rights of Way Act (CROW).
- Publicly owned land – Forestry Commission Public Forest Estate, Defence Estates.

  There is additional evidence on this in a report of a survey of potential open habitat on the Public Forest Estate.[6]
- Codes of practice and standards.
- Research and evidence.

We asked:

Question 23: Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?

In response to this question comments about the proposed delivery implications were received. These are set out below, with suggestions for additional mechanisms at the end of the section.

6.5.1 Public funding

Natural England comments on the position with regard to Higher Level Stewardship (HLS) funding. "In the case of HLS we do not foresee any major problems in targeting support at eligible sites (privately owned or tenanted with a 10 year or greater tenancy) to support management or through special project funding for issues such as remedial scrub clearance". They went on to mention the importance of identifying proposals and adding them to the Natural England Regional Tactical Plans because this would then allow time to ensure the associated budgets are allocated as necessary.

Yorkshire and Humber RAC highlight the "important link between Environmental Stewardship and the English Woodland Grant Scheme and the working relationship/interface between the Forestry Commission and Natural England." The RAC members feel that integrating support mechanisms in to this existing link would be beneficial. As would "consideration for any delivery implications relating to [the] new Rural Development Programme for England (RDPE) (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".

[6] Spencer, J and Edwards, R (2009) Open habitats and open habitat potential on the Forestry Commission Public Forest Estate in England, www.forestry.gov.uk/england-openhabitats.

Dorset Wilidlife Trust highlighted the need for a robust grant mechanism allowing the removal of trees planted on priority habitats. They think “there are a number of plantations which serve no biodiversity or landscape value, being dense conifer, planted on former heathland, chalk grassland or other habitats (including sites which were recognised Local Wildlife Sites) using either Forestry Commission grants or local council grants. It would be really helpful to be able to acknowledge that these trees are in the wrong place and remove them before they get to maturity”.

6.5.2 Adapting the way legislation is implemented

ConFor express a concern regarding the use of the Environmental Impact Assessment (EIA) process for assessing proposals for the expansion or restoration of open habitats. “Any proposal for deforestation must be rigorously assessed against an agreed set of criteria. It would be wholly unacceptable for proposals for open habitat restoration or expansion to be "fast-tracked" through the Environmental Impact Assessment process.”

Sherwood Forest Trust and Sherwood Habitat Strategy Group are concerned about the impact open habitats may have on public access. They suggest that it “may be necessary to make the process simpler for controlling access at certain times of year or in certain areas, so that it can be ensured that sensitive fauna are not detrimentally affected”. This would require a change in the way the Countryside and Rights of Way (CroW) act is implemented.

Devon Countryside Access Forum note “recognition of the complexities that might result if woodland removal leads to future designation of created habitat as open country under CroW”. They also state that they “would particularly welcome involvement in such instances as there are implications for land management and access use which would need careful assessment and consideration.”

6.5.3 Publicly owned land

One responder, Simon Harrap, draws attention to the Forestry Commission leasehold land holding “Some Forestry Commission plantations are on land that is leased under 999 year agreements. Yet these leases usually/always stipulate a minimum tree cover. The Commission MUST be able to re-negotiate these leases to facilitate the restoration of open habitats where desirable”.

6.5.4 Codes of practice and standards

The Bat Conservation Trust endorses the use of monitoring and collation of evidence as set out in the consultation document. “We would like to stress the importance of robust monitoring, comprehensive guidance documents and co-ordination across sectors to ensure consistency and the effective implementation of this policy”.

6.5.5 Research and evidence

The Bat Conservation Trust welcomes the “acknowledgement that there are major gaps in the evidence of net benefits of open habitat restoration”. Several responders said that the availability of reliable evidence is currently a major issue with regard to monitoring and analysis.

EFIP feel that “a detailed picture of role/implementation of private woodland owners and their influence over availability of quality timber” is needed.

The Association of Local Government Archaeological Officers proposed that “provision needs to be made for bringing relevant guidance documents, other than those produced by the Forestry Commission, to the attention of those who might be implementing the open spaces policy. For example, Natural England has recently produced a research report - 'Impact of heathland restoration and recreation techniques on soil characteristics and the historical environment' (Natural England Research Report NERR010). In the particular circumstances of extending open habitats in heathland areas, this could be of significant importance”.

Hurn Parish Council and West Christchurch Residents Association highlight a specific gap that is included in the consultation document but not the list of gaps of the evidence “There is no reference made to the evidence gap outlined in the last 2 paragraphs on page 30 of the consultation document. Those paragraphs refer to long term average carbon store and substitution. Research and evidence should include the consequences to the environment, of the net loss of carbon absorption which will result if this policy is implemented at any level”.

Some other suggestions for inclusion put forward were:

- South East England Wildfire Group would like to see a delivery mechanism developed which would reduce the risk of wildfires. “An example could be a tariff upon landowners who create open habitats. This would provide sufficient funds to prepare, prevent, respond and recover from wildfires as a result of this policy. In the example a tariff is composed of and initial flat rate and maintenance in perpetuity”.
- “The Habitats Regulations (European Protected Species) have to be considered under the legislation section. We have to guard against a race to benefit one species habitat at the potential disturbance or damage to another’s. This European legislation is promoted and overseen by the Forestry Commission. The implication of CRoW to open ground restoration is a major constraint to the private sector as is the potential loss of a woodland's commercial value and as such being vulnerable to being classified as non-commercial and losing certain fiscal benefits”. This suggestion was put forward by Tilhill Forestry.
- A further suggestion in this section was regarding the use of a joined up approach to deliver the objectives of the policy and was received from the New Forest NPA. “National Parks, Natural England and other Defra organisations are well placed to support the delivery of the policy and we would welcome closer involvement and a joined up approach. Advice and support from the public sector (such as National Park Authorities who already have existing mechanisms to provide land management advice in other areas) could assist private landowners in developing high quality proposals which will help achieve a strong balance of public benefits”.

7 Other comments.

We also invited comments on any aspect of the consultation.

This section provided a platform for raising thoughts, issues or suggestions that had not been addressed in the rest of the consultation document. Many responders used this section to reiterate the points they had made throughout the consultation.

The additional comments were wide ranging. One point made by four responders highlighted concerns over the way the costs of restoration had been calculated and presented. The main concern is that the costs do not take in to account the restoration of large areas, or expansion of existing areas of open habitat, which lead to greater patch size and reduced unit costs to those given in the consultation document. Natural England suggests "more work is done to tease this out once the policy direction is agreed".

Natural England presented another concern about the costings. They believe that although it is important to consider the forestry aspects, the wider context needs to be given as well. They see a requirement for reference to "how this level of support fits with other established support through Environmental Stewardship, together with some comparison of what the costs of meeting the Government commitment to open habitat restoration/creation would be from other land uses. In value for money terms, the cost of restoring open habitats from unproductive forests is likely to be the cheapest way of making progress towards the BAP targets: this important message does not come across".

The RSPB use this opportunity to highlight an example of the type of restoration project they would welcome under this policy. They use Rempstone Forest in Dorset to highlight an area they feel should be restored to heathland. The example includes reference to increasing connectivity between other important heathland areas, improving the landscape visually, biodiversity benefits, improving the archaeological heritage and removing low yield timber from the nutrient poor soils. They believe an area of up to 600 ha could be restored in this area alone, hence the ambitious targets called for in previous parts of the consultation.

Natural England show concern that wood pasture and parkland may not be adequately represented in this or other policies and therefore get overlooked. "There are instances where wood-pasture and parkland, itself a priority BAP habitat, could benefit from the removal of woodland. While not included in the definition of open habitat, there is the danger that this priority habitat will fall between this policy and the one covering plantations on ancient woodland sites". High Weald AONB felt that the creation of wood pasture and parkland should be considered in greater depth as a potential intermediate position.

Some responders challenged the assessment that there would be little impact on access and recreation stating that any change in land use may have wider implications with regard to public access and offer different opportunities for leisure activities. The Devon Countryside Access Forum "would not wish to see a situation where access opportunities might be diminished through a policy of woodland felling and open habitat restoration. Woodlands frequently provide good access for walkers, dog walkers, horse-riders, cyclists and those with mobility problems". The Forum also requested more active engagement with

Local Access Forums in general in the policy development process in future. Somerset Local Access Forum "would wish to ensure that any existing permissive access will be retained (or upgraded to multi-use) where it currently offers recreational access within woodland that will be replaced by open land."

Several other responders also voiced this concern about reduced opportunities for access. Conversely, many of the responses from the RSPB members campaign stressed the value of open habitat for relaxation and enjoyment of nature.

The implications for the future management of areas not converted to open habitat were highlighted as a concern by the BTO, which they feel could be important at a local level. Their example is "A large conversion of managed conifer forest to open habitat could result in the remaining forest being managed more intensively, for example through the felling of retentions on a shorter rotation and through the planting of permanent open space. Were this to happen it would probably have a deleterious effect on biodiversity in managed forests. The importance of many managed forests as large reservoirs of biodiversity should not be under-estimated".

Cannock Chase AONB highlight their concerns that "the document does not acknowledge statutory designations such as AONBs. There is a legal duty to protect them within the work of managing woods and forests in England. It would therefore be helpful to take landscape scale designations (particularly statutory ones) and landscape scale management into account within the overall choice of policy".

We received several compliments regarding the process the openness exhibited throughout. EFIP, however, express concern about "the lack of transparency of the latter part of the consultation process, i.e. preparing the consultation report and option selection for the attention of the Minister". There were also concerns that the consultation document was too complicated to engage members of the general public. Hurn Parish Council obtained feedback from members of their community indicating that the complexity of the document had a detrimental effect upon the number of responses received from members of the general public.

8 Conclusions.

We are delighted with the number and range of responses and the overall quality of the input. We are grateful for the positive comments about the process while noting the criticism from some.

There is no clear consensus. The more reasoned responses can be allocated to three broad schools of thought:

- Woodland removal is a last resort because of the impact on carbon emissions, the timber industry and costs. Removal must be compensated by like for like planting, including of conifers.
- A policy focussed on a defined land-use for a particular reason (be it woodland for timber or open habitats for biodiversity) is unhelpful because it is possible to provide multiple benefits through landscape scale planning.
- Woodland removal to restore open habitats is supported because it helps with climate change adaptation and achieving BAP targets. There should be

ambitious targets but they can be achieved over a long timescale. Negative impacts on woodland biodiversity, amenity and greenhouse gases are relatively low and can be mitigated by (native) planting across the country.

9 Next steps

The next step is to use the information gained from this consultation and other strands of evidence to construct a set of policy proposals that will be considered by Ministers. We plan to submit policy proposals to Ministers in autumn 2009. We will keep stakeholders informed of progress via the web and periodic updates by e-mail and at appropriate forums.

10 Annex 1: Summary of policy development process

See www.forestry.gov.uk/england-openhabitats for further details.

No.	Step	Mechanism	Timescale
1.	**Fit progress to date into a policy cycle.**	Forestry Commission (FC) to use work to date.	June 2008.
2.	**Work out implications for delivery mechanisms and collate evidence.**	FC to set out summary of evidence.	August – September 2008.
3.	**Plan evaluation.**	Including stakeholder workshop.	Sept – Oct 2008 Workshop 26 Sept: reviewed evidence, ranked outcomes, developed criteria.
4.	**Appraise options.**		
5.	**Consult.**	Formal public consultation.	Launch March 2009, finish June 2009.
6.	**Make a decision.**	Proposals to be submitted to Ministers by FC.	Autumn 2009.
7.	**Produce policy document.**	FC to draft.	Depends on policy decision.
8.	**Set up delivery mechanisms.**	Depends on policy decision but will include a strategy for the Forestry Commission Public Forest Estate. [7]	Depends on policy decision.
9.	**Launch policy.**	Launch at an outdoor event.	Depends on policy decision.

[7] This will be produced to follow policy and in accordance with the results of the study of the long-term role of the Public Forest Estate, see www.forestry.gov.uk/england-estatestudy.

11 Annex 2 – Document accessibility

This document is available to read and to download in portable document format (Adobe pdf) from the following internet page: www.forestry.gov.uk/england-openhabitats-consultation.

If you need this publication in an alternative format, for example in large print or in another language, please contact:

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