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FORESTRY COMMISSION
ENGLAND NATIONAL OFFICE

25 May 2009

Mr Dominic Driver
Senior Projects Officer
Policy and Programme Group
Forestry Commission England
620 Bristol Business Park
Coldharbour Lane
BRISTOL BS16 1EJ

Dear Mr Driver

Restoring and expanding open habitats from woods and forests in England

Please find attached my comments on this consultation. I would like the following points also taken into consideration as part of my comments.

- Restoration must be targeted to the areas that will ensure the best outcomes for wildlife and sustainable management. A priority is creation of open habitats next to existing ones (eg, restoring or creating new lowland heathland next to remaining heathland). Larger areas of open habitat will be more resistant to various damaging impacts, including human disturbance and climate change. Linkages must be made between habitats.
- The FC policy for restoring and expanding open habitats must set ambitious targets for the restoration of those habitats lost to afforestation in the past. The short-term aims of the UK BAPs must be combined with a long term plan to maximise the potential for heathland potential, before the remnant heathland conditions on planted sites are lost – and restoration necessarily becomes creation, a much more difficult undertaking.
- Targets for restoration and creation must be ambitious rather than scaled down because otherwise the potential for enabling species to move in response to local and national climate change will be reduced, as will the added 'buffering' protection afforded by expanding small areas of remaining habitat through restoration and creation.

- Restored areas of open habitat can provide valuable areas for informal recreation, relaxation and the enjoyment of nature. Much research has outlined the physical and mental health benefits of access to green space and nature. Restoration of open habitat such as heathlands in proximity to towns can contribute towards this.

On a personal note, I grew up with the image of open lowland heathland landscapes described in the novels of Thomas Hardy and was extremely disheartened to discover the fragmented and degraded reality last century. I also volunteered over several years to help manage wildlife sites. This included removing invasive species, including conifers, from several lowland heathland and other sites to help restore them. For me, there is an easy choice between the lifeless interior of a dense conifer plantation, and the wildlife richness and diversity of heathlands, moorland and wetlands. I hope this consultation will result in a legacy of restored open habitats in this country, especially lowland heathland in southern England.



Questions from our consultation

This form sets out the questions we ask in a consultation on restoring and expanding open habitats from woods and forests in England that we launched on 12 March 2009. The consultation ends on 5 June 2009. You can find the consultation at www.forestry.gov.uk/england-openhabitats-consultation or contact Dominic Driver, Forestry Commission for further information (contact details below).

Comments on any aspect of the consultation are welcome, but we are particularly interested in your responses to the questions below. This form is available at www.forestry.gov.uk/england-openhabitats-consultation.

Your name:	
Your organisation (if any):	
Date:	25 May 2009

No	Question.
The nature of the change	
1.	Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?
<p>Not the lower aspiration. I believe the FE aspiration should be more specific than the great range set here and 30,000 ha should be the minimum target. Afforestation has accounted for the loss of enormous areas of lowland heathland (eg, Dorset) and upland moorland (eg, the Flow country) over the last century and the minimum target should be restoration of that which has been lost. Given that the UK lowland heathland resource is today less than one sixth of that which once existed, and that afforestation was the major cause of loss, restoration of this one open habitat type alone will account for about half of the recommended FE target. There should be long term restoration targets as well as the fairly short term within the existing BAPs.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Ecological communities able to cope with threats - rather than "biodiversity is not lost", this desired outcome should be elevated to "related open habitat BAP restoration and creation targets are met".</p> <p>Financial viability - calls on public funding should be related to the costs of agreed BAP restoration and creation targets, not some other financial limit.</p>	
Measuring the success of the policy	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to

No	Question.
	suggest any amendments to this indicator list?
	<p>Ecological communities able to cope with threat - this is insufficient, given that restoration of open habitats from forestry is essential to restore sufficient areas of those habitats to enable (a) their survival and (b) their long term ability to accommodate climate change and other effects without further loss. Should be "Ecological communities restored to relevant BAP targets related to woodland removal and able to cope with threat".</p>
	<p>Policy proposals Elements present in the policy We will treat woodland and open habitats as potentially mutually beneficial</p>
4.	<p>Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?</p>
	<p>Yes, open habitats need not be totally tree-free and transition between open and wooded habitats should not be sudden, though the species of tree, etc, remaining should be native to the area and part of the open habitat character . However, 6.1 6 is of concern. The threshold for woodland removal due to restoring and expanding open habitats should be set by BAP targets for that restoration and expansion and not by any lower threshold not related to either open habitat restoration/expansion or native woodland (on non BAP priority habitats) creation.</p>
	<p>A presumption against removal of 'mature native woodland'</p>
5.	<p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>
	<p>Yes, strongly support this. However, as mentioned, would support the removal of non-native woodland from locations once open habitats and also the removal of young native woodland where it has been planted inappropriately and its retention will create a habitat of less net biodiversity benefit in terms of both BAP priorities and general diversity and interest than restoration of that land to its previous habitat.</p>
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p>
	<p>"Sites currently composed of native broadleaves that have been wooded for at least 80 years" - this needs clarifying as could embrace sites that were planted with non-native conifers 80 years ago and more recently replanted with native broadleaves. Suggest change to "Sites that have been composed of native broadleaves for at least 80 years and where restoration to any previous type of open habitat is considered of less biodiversity value than maintaining the woodland and maximising its biodiversity value". Support comments re wet woodland.</p>
	<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>
7.	<p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>

No	Question.
	<p>Consulting and engaging with the local community is essential, not least to properly explain the value of any targeted open habitat restoration on a currently wooded area, to dispel myths (eg, "That woodland has always been there" "Trees are always of paramount importance in the countryside, regardless of the type, age, location and reasons for planting in the first place", "Open habitats are not as valuable for recreational purposes as conifer or other forests") and to explain the nature of tree removal/open habitat restoration (such as not all trees will be removed, phased removal, screens and areas of trees left, etc). I think a combination of the approaches 1, 3 and 4 are best. 2 is not viable, trying to sort out opposition late in a project is far more difficult than anticipating and resolving issues at an early stage with proper public consultation and participation. There will always be `diehard' opposition to any tree removal but these views must not be allowed to dominate but should be matched by reasoned explanation from the restoration propeers/partners and support from other third parties</p>
	<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>
	<p>Yes, but setting of priorities must always have reference to national, regional and local BAP plans, rather than any conflicting FC region. Priorities must also not be led by access and recreation interests; this should be integrated with (not lead) biodiversity priorities.</p>
	<p>We will apply a framework for evaluation to projects</p>
9.	<p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>
	<p>The desired outcomes should always be biodiversity led.</p>
10.	<p>How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?</p>
	<p>Reference to BAP plans and targets should be highlighted above interests such as private sporting or other local recreational demands unless these can be accommodated without damaging the biodiversity aspirations.</p>
	<p>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.</p>
11.	<p>Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?</p>
	<p>I think thresholds on any England or smaller scale should take account, and not override BAP targets for open habitat restoration on those areas, and removal of forestry for those purposes should proceed with thresholds target for woodland cover maintained by native woodland enhancement and creation on suitable sites not targeted for open habitat restoration.</p>
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>

No	Question.
Key variables	
What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?	
13.	Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?
I do not think that reducing greenhouse gas emissions and achieving biodiversity objectives should be an either/or issue. The need to restore biodiversity is agreed, and some biodiversity restoration (eg, conifers off Scottish flow country, conifers off wet heathland) must help reverse the carbon release that tree planting caused originally.	
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?
Yes, practices seem sound. Make them a condition of any grant aid (eg, agri-environment scheme).	
15.	Do you agree that it is appropriate to include impact on long-term average carbon store <i>and</i> loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?
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?
To continue with an open habitats restoration policy as identified in BAPs but ensure that new native woodland planting is carried out on non or potential high value other habitat sites to compensate.	
Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?	
17.	Outside SSSIs, do you agree that a more dynamic attitude to land management could deliver equivalent or greater gains for open habitats and species than one where success for all sites is based on assessments of condition as applied to SSSIs?
Only where the overall biodiversity interest, taking into account all the constituent vegetation mosaics and animals, rather than just those species able to respond well to a greater woodland/open habitat mix and a mix that shifts location in time, can be both maintained and enhanced in such a system.	
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

No	Question.
	you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?
	Management of SSSIs must meet the conservation objectives. Any different approach would require trial on a non-SSSI site, monitoring and review to prove success according to answer in 17 above before any wider adoption.
	What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
No.	
	Different approaches to applying policy
20.	Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?
	6.3.2 but with the review recommended in 6.3.3 to measure progress in new native woodland planting and the prioritisation approach re open habitat restoration in 6.3.1.
	The role of compensatory planting
21.	What is the appropriate role of compensatory planting in this policy?
	Woodland planting should not be grant aided where its location will conflict with biodiversity restoration targets. Planting should be with species and on sites that are appropriate for new woodland in order to meet the Woodland HAP, be that expansion of existing or creation of new woods.
	Factors to consider when deciding which policy is likely to work best
22.	Have we developed a reasonable set of questions for informing the decision on which policy is best? Do you wish to suggest any changes to the list of questions?
	Change 'Ecological communities able to cope with threats' to "Open habitats restored from afforested sites (eg, lowland heathland) and existing and new ecological communities able to cope with threats".
	Implications for delivery mechanisms
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
	The restoration potential for afforested sites to their previous habitats will decrease over time. Restoring sites to their previous open habitats of national significance (eg, lowland heathland) should be a priority, because delay will lessen the biodiversity worth of the process and make the work more difficult and costly to undertake.
	Other comments

