

# Questions from our consultation

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

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

<b>Your name:</b>	Anon.
<b>Your organisation (if any):</b>	n/a
<b>Date:</b>	10/04/2009

No	Question.
<b>The nature of the change</b>	
1.	<p>Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?</p> <p>There should be no further intervention.</p> <p>There has been far too much deforestation already in the pursuit of "Open Habitats".</p> <p>To name some examples where there has already been massive deforestation within a 30 mile radius of where I live: Ash Ranges, Woolmer Forest, Hindhead Common, Bourne &amp; Tilford Woods, Linchmere Common, Chapel Common, Woolbeding Common, Harting Down, Bramshott Common, Blackdown, Witley Common, Wisley Common, Yateley Common among others, amounting in all to thousands of acres. It is now nearly impossible to walk in any direction from my home for any distance without coming across destroyed Woodlands.</p> <p>It is known that deforestation is a major cause of Global Warming. This from: <a href="http://www.forestry.gov.uk/newsrele.nsf/WebNewsReleases/A868D72D22870F4980257571003A7B8B">http://www.forestry.gov.uk/newsrele.nsf/WebNewsReleases/A868D72D22870F4980257571003A7B8B</a></p> <p>"Forests and woodlands play an important role in the fight against climate change. By planting more trees we can lock up more carbon and reduce the harmful impact our emissions have on the planet.</p> <p>"Current planting rates in Scotland are too low and we must dramatically increase them if we are to make a significant contribution towards the Scottish Government's ambitious climate change target of reducing greenhouse gas emissions...."</p> <p>If this is true for Scotland, how can it not be true also for England, which has a much lower percentage of Woodland than Scotland? Yet the policy for England appears to be no increase in Woodland cover at all, and if possible the deliberate reduction in Woodland</p>

No	Question.
	<p>cover in a country that already has only a paltry 8% of land area covered by Woodland.</p> <p>This from:  <a href="http://www.forestry.gov.uk/newsrele.nsf/WebNewsReleases/82448B3A2020F1108025757800429DB">http://www.forestry.gov.uk/newsrele.nsf/WebNewsReleases/82448B3A2020F1108025757800429DB</a></p> <p>"Climate change is one of the biggest challenges facing our generation. The effects of this can be eased by woodlands and trees, which is why the new Woodlands for Wales strategy sets out bold and ambitious plans to help Wales towards its targets of a year-on-year 3% reduction in greenhouse gas emissions from 2011.</p> <p>"Our aim is to increase the woodland cover of Wales – including in towns and cities - as well as increasing the range of tree species in non-native woodlands. These measures, along with bringing more native woodland into active management, will help to achieve a range of environmental and social benefits. As well as tackling climate change, these actions can control flooding and maintain levels of timber production in line with the Assembly's efforts to promote and increase the demand for this renewable resource.</p> <p>"Increasing Wales's woodland cover will also provide a wide range of opportunities for people from all walks of life to become involved in their woodlands and to enjoy them as places for recreation and learning, while contributing to the nation's health and well-being."</p> <p>If it is true that increasing Woodland cover in Wales contributes to to the well-being of local people, surely this is also true in England. Do people living in England not have the same rights to an environment that improves health &amp; well-being?</p> <p>Now to the consequences of the deforestation "Open Habitats" policy for local people. The closest recently deforested landscape to me is Bramshott Common. Many of the trees on this site have been felled in recent years. The impact on local people has been a considerable increase in traffic noise from the A3, as there is no longer enough vegetation to muffle the noise (in Summer, in Winter the trees had minimal noise reduction impact). Pollution from traffic has increased significantly. As someone who has lung problems when exposed to traffic fumes this is a concern to me. Trees are known to absorb pollution.</p> <p>From:  <a href="http://www.forestry.gov.uk/newsrele.nsf/WebNewsReleases/C9A6CF311A15D20C8025757E0036B24E">http://www.forestry.gov.uk/newsrele.nsf/WebNewsReleases/C9A6CF311A15D20C8025757E0036B24E</a></p> <p>"...wide range of social, economic, health and environmental benefits, including the creation of wildlife habitats, noise reduction, sustainable drainage and flood control, cooling of buildings and the built environment, improved air quality...."</p> <p>And what of the impact of deforestation on Bramshott Common itself? The trees have been replaced by brambles, bracken, ragwort &amp; creeping thistles. Footpaths are rapidly blocked by these plants, and mowing is needed to keep them under control (hardly a natural process or a very environmentally sustainable one). How long the woodland flowers - wood anemones, primroses and violets will last now is anyone's guess. If grazing by cattle is introduced the flowers will be destroyed rapidly. The heather on the site has actually declined since the tree felling, as the trees suppressed the plants above.</p> <p>I have walked across many of the sites I mentioned, before and after deforestation. The</p>

No	Question.
	<p>sound of bird song has been replaced by silence; or quite often traffic noise as many are near main roads and with the trees gone there is nothing to muffle the traffic noise. In summer the sites can be too hot to walk across and in winter too bleak and windswept. On most of the locations after the trees have been destroyed, I have seen no signs of wildlife at all. No birds, no mammals and no reptiles.</p> <p>Most of these destroyed woodlands listed above were made up of naturally regenerating native trees (a few were plantations).</p> <p>Heathland &amp; grassland management seeks to destroy, disrupt or stop natural processes that have taken millions of years to evolve.</p> <p>The impact on existing wildlife is devastating. At Hindhead Common, local bird-watchers reported the loss of hundreds of bird-nesting sites. The National Trust Warden admitted that there had been a major adverse impact on Tree Pipits, a bird species in rapid decline. Around 70 pairs were reduced to 3 or 4 pairs. The NT claimed (among other things) that the tree removal was to "help the bilberry", yet when I was there the cattle were grazing the bilberry into stunted remnants.</p> <p>The deforestation of Hindhead Common &amp; Devils Punchbowl has also caused serious soil erosion, which after numerous years is still present. Soil erosion is a known consequence of deforestation, it also occurs in England.</p> <p>The following extract is from: <a href="http://www.self-willed-land.org.uk/articles/open_restore.htm">http://www.self-willed-land.org.uk/articles/open_restore.htm</a>.</p> <p>It deals with the dreadful impact of "Open Habitat" creation on reptiles, I will quote it at length because it illustrates all that is wrong with the target approach to land management:</p> <p>"A thread began in February last year on the Reptiles and Amphibians UK (RAUK) e-forum about the destruction that "tidying up" on nature reserves caused to reptile habitat (2). Photographs posted there show examples of the heavy handed management: one looks more like a clearance in preparation for road building rather than "nature conservation"; and another in Epping Forest shows a clear-felled and scraped-through landscape, completely exposing a hibernation site (hibernaculum) for adders and grass snakes. This destruction was revisited in a second thread on RAUK last May when Al Hyde, who had been observing heathland management in Surrey for many years, noted that the management had been followed by a catastrophic drop in the number of reptiles present, and in some cases complete extinction of reptile populations (3).</p> <p>A key theme of the contributors to this second thread is the lack of specialist knowledge and attention to reptiles given by the conservation industry, to the point where Suzi added the telling point, albeit in ironic despair:</p> <p>"Will any of us be around when we are knee deep in nightjars and thoughts turn to saving the adder? Will the big guys be telling us that adders are a very threatened species and they know just how to save them. It will involve building banks for hibernation, allowing areas of bracken and birch trees....stop me if there is something here that rings bells!"</p> <p>Armata had pointed out, using photographs, how important the natural mulch layer under gorse and copses of silver birch was as sites of hibernation for reptiles, and thus had to be part of the heathland mosaic. "Hopefully we can get past this 'Calluna monoculture syndrome'", he said. Gemma Fairchild of the Kent Reptile and Amphibian Group summed it up for many on the thread:</p>

No	Question.
	<p>"Some of my favourite haunts have been trashed beyond recognition by 'heathland management'. I moan about small areas in Essex but some of the places I know in Surrey are nothing but a tragedy, I can't even bring myself to visit some areas now"</p> <p>She could have been talking about Ash Ranges, an MOD site between Ash and Pirbright in Surrey that has received the full destructive force of the Surrey Heathland Project over the last few winters ....</p> <p>Al Hyde first mentioned the habitat destruction and extinction of reptiles at Ash Ranges on the RAUK e-forum when he used an ariel photograph to point out an area that used to have many adders, grass snakes, common lizards and slow-worms, but had become a bleak desert after clearance with no sightings of snakes and only two of common lizards (3). He also marked on the same ariel view the position of hibernacula that were destroyed during management. Al returned to the destruction on Ash Ranges when he sought to take the issue of heathland management and reptile persecution to a wider audience on the Wild About Britain website (7). Al was right about the wider audience, as his post immediately brought in challenges to his observations, the apologia-tendency for the conservation industry so often seen amongst its groupies. Al could only respond with the evidence of his eyes:</p> <p>"All [heathland sites] have healthy populations until management is carried out. Dead reptiles are found during work (I have photos I will dig out soon) and hibernacula bulldozed to the ground, the very next year or immediately afterwards these areas are devoid of life never to return to the healthy numbers"</p> <p>He was backed up in this by another observation from armata:</p> <p>"At Studland in Dorset a few years back I just happened to be present when a contractor had uprooted a large gorse bush - dangling underneath were a bunch of slow worms and several adders - I pointed this out, but the contractor just smiled and dumped the bush with the rest of the spoils. Conservation at work folks. If you think that is acceptable then all you Wildlife Trusts, National Trust and Natural England, please raise your hands, so we all know where we stand"</p> <p>It would be interesting to see how many would put their hands up, after it was pointed out on the thread that bulldozing a hibernaculum and killing reptiles was an offence under Schedule 5 of the Wildlife and Countryside Act, 1981 (8) leading one contributor to wonder how it was that the Wildlife Trusts, National Trust and Natural England were able to get away with it when a building developer would undoubtedly be prosecuted."</p> <p>The comment above about Surrey is how I feel about what has been done to my home county. There are many areas I can no longer visit, the consequences of "Open Habitat" creation have been just too dispiriting.</p> <p>This activity in Surrey is part of "The Surrey heaths project". This organisation uses the inaccurate, and intentionally misleading title of "Surrey's last wilderness" for it's activities. Just how the use of chainsaws and heavy tree clearance machinery, fencing off large areas of land, the introduction of cattle, the use of chemicals such as stump killers, glyphosate and asulox and the bizarre practice of soil scraping can be regarded as "wilderness" is a mystery to me. The real wilderness was the naturally regenerating woodland that these people have destroyed.</p> <p>Further information on the environmental unsustainability of "Open Habitat" creation can</p>

No	Question.
	<p>be found at: <a href="http://www.self-willed-land.org.uk/heath_madness.htm">http://www.self-willed-land.org.uk/heath_madness.htm</a></p> <p>A couple of years ago archeologists did a study of neolithic firewood on a Surrey heath. They were surprised to find only 1 species across the whole site - beech. This indicates that at least some heaths were originally beechwoods. At Yateley Common &amp; Ashdown Forest and other locations, beech trees had begun to return in significant numbers, before they were destroyed (against local people's wishes) by conservationists with the ridiculous excuse that "they are not heathland trees". I have a picture of Yateley Common by a local artist showing the mature beech trees before they were destroyed.</p>
<b>Desired outcomes</b>	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<b>Measuring the success of the policy</b>	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
<b>Policy proposals</b>	
<b>Elements present in the policy</b>	
<b>We will treat woodland and open habitats as potentially mutually beneficial</b>	
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?
<p>There should be no further creation of "Open habitats" from any type of native Woodland. England has too little Woodland already.</p> <p>Any open habitat creation should be from farmland, especially since farming is unprofitable in many areas. An example of the kind of project can be found at: <a href="http://www.knepp.co.uk/">http://www.knepp.co.uk/</a></p> <p>As to whether woodland and open habitats are mutually beneficial, some evidence would be needed before I can know this.</p> <p>There is evidence from the Forestry Commission's website that the management method of "rotational forestry" can be beneficial. This should be the only method used to create open habitats in Woodland.</p> <p>Non-native Conifer plantations could be thinned to make a more open woodland, and allow native species to return. As Scottish Forests prove, heather, bilberry and other "heathland" plants thrive perfectly well in this type of woodland.</p>	

No	Question.
<b>A presumption against removal of 'mature native woodland'</b>	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
<p>I agree entirely with this principle.</p> <p>However, there should be no removal of naturally regenerating native woodland at all, unless the aim is to speed up the processes of natural succession from secondary to primary Woodland, or the Woodland is to be managed for timber or biomass production.</p>	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
<p>The 80-year limit effectively permits the destruction of all naturally-regenerating woodland that has arisen since the earliest part of the 20<sup>th</sup> Century. This cannot be right. Some native trees such as birch, aspen, wild cherry can reach maturity much earlier than this, and I know from my own experience in creating woodland that woodland flora &amp; fauna can return in only a decade, and have colonised significant areas of a site within 20 years (provided that deer &amp; rabbits are absent). So I suggest 20 years should be the definition.</p>	
<b>We will expect practitioners to help local users to participate in development of the initial proposals</b>	
7.	Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?
<p>Local participation is vital. There many examples where there has been no consultation at all. And with the very few consultations that have taken place, the wishes of local people have been largely ignored. 2 examples are the Bourne &amp; Tilford Woods (re-named as Farnham heath, even though I can find no historical references to such a place) and Esher Common.</p> <p>The un-democratic nature of "Open habitat" creation can be found in: <a href="http://www.self-willed-land.org.uk/heath_madness.htm">http://www.self-willed-land.org.uk/heath_madness.htm</a> (referred to earlier).</p> <p>Since the consultation document (eng-open-habs-consultation.pdf) explains that huge sums of taxpayers money is involved, it is only fair and morally right that local people should be consulted.</p> <p>As to how this should be done, at the very least there should be announcements in local press, including free newspapers and at a national level. There should always be an announcement on the FC website. There should also be a local mail-shot. This is after all something that may have a major adverse impact on the quality of life of local people.</p> <p>But a major problem lies in the often inaccurate &amp; intentionally misleading information supplied by the practitioners. The consultation document (eng-open-habs-consultation.pdf) is the first example I have seen where there is even-handedness and accuracy.</p> <p>As an example a spokesperson for the Surrey Wildlife Trust claimed that they were "only removing plantation trees" at Wisley Common, yet I saw lorry-loads of birch trees being removed. I'm fairly sure that birch trees have never been used as a plantation tree in this country.</p>	

No	Question.
<b>We will promote mechanisms for prioritising woodland removal at a regional level</b>	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
As mentioned there should be no further native-woodland removal, except as part of a process of management as Woodland.	
<b>We will apply a framework for evaluation to projects</b>	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?
<p>The framework should specify that no area of naturally-regenerating native Woodland can be cleared, and that clearance of plantations must involve the creation of replacement woodland. Where Plantations are the only available Woodland in an area, no open-habitat creation should be permissible from that land. Farmland should be specified as the principal source of land for Open habitats.</p> <p>The framework should be imposed on Practitioners.</p>	
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?
<b>To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.</b>	
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?
<p>I agree that it is essential that there should be no net-deforestation in England, and that the principle of the threshold approach is sensible.</p> <p>There should be no local net-deforestation either, and practitioners who wish to deforest an area (for example, a conifer plantation) should be compelled to create replacement woodland in the same area.</p> <p>Failure to adopt this approach means that local environments can be transformed into a deforested landscape in only a few years.</p> <p>The replacement woodland should be created before any open habitat creation can be started.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
Too high.	
<p><b>Key variables</b></p> <p><b>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</b></p>	

No	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?
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?
	Don't destroy the woodland. That will minimise carbon emissions.
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?
	Yes.
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?
	<p>I regard the need to reduce carbon emissions as being far more important than bio-diversity objectives.</p> <p>As far as I can tell from 6.5.5, there has not even been a proper survey of the "open habitat" creation that has already taken place, how can you even know if the bio-diversity objectives are being met?</p>
	<p><b>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</b></p>
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?
	<p>The "favourable condition" approach seems a truly bizarre attitude towards land management.</p> <p>It makes the assumption that humans know best what should be on that land.</p> <p>That there should be no consideration of the changing climate.</p> <p>That the land should be, what it is assumed it was, at some imaginary static position in the past.</p> <p>It takes no account of what wildlife &amp; vegetation is on the land already.</p> <p>It takes no account of natural processes at all.</p> <p>The whole approach is wrong.</p> <p>So, yes, there should be a more dynamic approach to land management, and that</p>

No	Question.
	includes the SSSIs.
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?
	Abandon the static approach. It is harmful to existing wildlife, to the quality of life of local people, it is very expensive, contributes to global warming and is wholly artificial.
<b>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</b>	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
	No.
<b>Different approaches to applying policy</b>	
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?
<b>The role of compensatory planting</b>	
21.	What is the appropriate role of compensatory planting in this policy?
<p>As mentioned above, compensatory planting should be compulsory.</p> <p>It should also be retrospective and apply to all the sites that have already been deforested as a part of this policy.</p> <p>Compensatory planting should be in the area where the "Open Habitat" creation has been carried out.</p>	
<b>Factors to consider when deciding which policy is likely to work best</b>	
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?
<b>Implications for delivery mechanisms</b>	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
<b>Other comments</b>	

No	Question.
	We welcome your input on any other aspect of this consultation.
	<p><b>Is it wise, or morally right, to assume that other countries will always be able, or willing, to supply the timber products used in England, because England has far too little woodland to support it's own requirements ?</b></p> <p><b>Is it right to have a policy which appears to prevent the country ever increasing it's forest cover ?</b></p>

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

**Please send your completed forms to:**

[Dominic Driver](#)

Senior Projects Officer | Policy and Programme Group | Forestry Commission England

620 Bristol Business Park | Coldharbour Lane | Bristol | BS16 1EJ

0117 906 6003 | 07779 627668 | [oh.consultation@forestry.gov.uk](mailto:oh.consultation@forestry.gov.uk)

Fax: 0117 931 2859

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

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