

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:	Lisa Hundt - Biodiversity Officer
Your organisation (if any):	The Bat Conservation Trust
Date:	5 th June 2009

The Bat Conservation Trust (BCT) welcomes the opportunity to respond to this consultation and is keen to comment on the resulting detailed government policy proposal for the re-creation of priority open ground habitats from forestry and early successional woodland in England. We are also keen to be involved in a public consultation on the delivery plan for the public forestry estate.

There are currently 17 species of bats in the UK. The majority of Britain's bats evolved to live in trees. Bats use trees as roosts because they offer a wide variety of conditions that bats require at different times of year. All species of bats are listed as European protected species under the European Union's Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (commonly known as the Habitats Directive). This directive is implemented in the UK by the Conservation (Natural Habitats &c.) Regulations 1994 that were amended in all four countries of the UK in 2007. There is also some protection under the Wildlife and Countryside Act 1981 (as amended).

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?

Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
Yes, but BCT would like to suggest that the desired outcomes could be amended to include reference to positive impacts.	
BCT agree that a mosaic of woodland and open-habitats may be beneficial to some species and increase the communities' ability to cope with threats, but wish to see the strategy based on scientific evidence that refers to information on the habitat	

No	Question.
	<p>requirements of a range of open habitat and woodland species.</p> <p>A desired outcome could therefore be to see the declining trend in key open habitat and woodland species reversed. This should therefore also include reference to secure long-term management and monitoring.</p>
<p>Measuring the success of the policy</p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
	<p>No, BCT supports that population trends of UKBAP species associated with open habitats should be monitored. However, we feel monitoring should not be restricted to species in open habitats.</p> <p>There is a need to monitor trends of woodland species in order to demonstrate that open habitats created have been delivered without compromising the status of woodland species, particularly European Protected Species (EPS). For example, it would be of particular value to consider the impacts on the barbastelle, Bechstein's bat, lesser horseshoe bat and greater horseshoe bat (i.e. species listed on Annex II of the EU Habitats Directive whose distribution is relatively limited and are closely associated with woodlands).</p> <p>BCT feel that there is an opportunity to develop partnerships that would help to identify and monitor appropriate indicator species of both open and woodland habitat to evaluate the overall success of the scheme.</p>
<p>Policy proposals</p>	
<p>Elements present in the policy</p>	
<p>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, provided that the local habitat characteristics and species present are considered at the application stage on a site by site basis.</p> <p>BCT feel that this principle could promote sustainable management practices and encourage the development of ecotone habitat important for some specialist species. However, at a local scale the balance in value may be weighted differently according to the species present, the quality of habitats and the functions they serve.</p> <p>Woodlands are important habitats for British bats. Recent work at the University of Sussex has shown that the highest species diversity and abundance of bats occurs in oak woodlands that have a good cover and understory. In the case of the Bechstein's bat, a species heavily reliant on closed canopy woodlands with high levels of understory, attempts to improve woodlands through operations such as thinning, reintroduction of coppicing and the opening of rides and glades has had a detrimental effect. In some cases the clearance of plantation woodland has ecologically isolated local populations by restricting their mobility making them vulnerable to extinction.</p> <p>BCT would like to direct the Forestry Commission to the Bat Conservation Trust (BCT) joint publication 'Woodland management for bats'. This document could provide guidance for woodland managers under the Conservation (Natural Habitats &c.) Regulations 1994 (as amended) where the activities may give rise to a disturbance to protected woodland</p>

No	Question.
	species.
A presumption against removal of 'mature native woodland'	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
	<p>Yes, BCT support the principle that there should be a presumption against the removal of mature native woodland. However, we would strongly suggest that the presumption against removal 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.</p>
6.	What do you think of our proposed outline definition of 'mature native woodland'?
	<p>BCT welcomes a definition of mature native woodland within the document, but is concerned that the assessment is limited to physical characteristics. In many cases ecosystem functions and the species that the habitat support, such as BAP and EPS are indicators of characteristics associated with mature native woodland that may not be identified within the definition outlined in the policy document.</p> <p>We would therefore suggest that when defining mature woodland, the presence of species that are often indicators of biodiversity value (i.e. Annex II species such as Bechstein's bat) are also considered and appropriate sources such as the NBN and local wildlife groups are consulted.</p>
We will expect practitioners to help local users to participate in development of the initial proposals	
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>Yes, we agree that local participation in decision making is helpful and feel that it is important to have evidence of high quality engagement before proposals are considered. Forestry Environmental Impact Assessments and Felling Licensing can provide the opportunity to engage with wider stakeholders such as local wildlife groups and can work to ensure that the correct site specific factors are considered.</p> <p>BCT also support a contribution to help practitioners as outlined in option 4, and would welcome the opportunity to use our knowledge in this area to produce best practice guidance.</p>
We will promote mechanisms for prioritising woodland removal at a regional level	
8.	Do you agree that prioritisation at a regional level is appropriate for this policy?
	<p>BCT agree that prioritisation at a regional level is appropriate, provided that this does not adversely affect or override local biodiversity initiatives.</p> <p>Bats operate at a landscape level where connections between woodlands can be vitally important as commuting and foraging routes for many species. However, BCT feel that</p>

No	Question.
	<p>prioritisation should not be based on existing woodland cover as outlined within the consultation document. In some cases the expansion of open habitats in an area where woodland cover is low could have an adverse by increasing fragmentation, when the appropriate action would be the planting of native woodland species to increase connectivity.</p> <p>BCT would therefore support this approach as long as proposals seek to deliver the best outcomes for UK biodiversity. This approach would rely on the successful co-ordination of schemes at a national, regional and local level to ensure that biodiversity is not compromised at any level.</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>-----</p>
	<p>-----</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>-----</p>
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<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>-----</p>
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12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p> <p>-----</p>
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<p>Key variables</p>	
<p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
13.	<p>Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?</p>
	<p>BCT feels that this issue could be addressed through referencing targets set for UKBAP species and habitats affected by these proposals, although the length of time will vary depending on the site.</p> <p>There is the facility to draw on existing data from surveys such as the National Bat Monitoring Programme (NBMP) to model the impact of habitat schemes on species. The FSC should seek to set up partnerships with organisations who can provide similar information on priority species, which could be used to model the overall impact and</p>

No	Question.
	success of the re-creation schemes on biodiversity.
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?

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?
<p>BCT acknowledges the importance of balancing biodiversity objectives and reducing carbon emissions. The conservation status of all UK BAP species and habitats must be maintained in line with the EU's Habitats Directive. We would support the creation of some areas of open habitat provided that UK BAP species and habitats are not adversely affected, and connectivity across and between woodlands was maintained. BCT therefore feel that this policy should seek to balance the reduction of carbon emissions with the biodiversity objectives stated in the Habitats Directive.</p> <p>In order to assist in making this judgement, BCT recommend that proposals follow the guidelines set out in the 'Woodland management for bats' publication and advice is sought from stakeholders to ensure that strategies take local characteristics into account and species are not adversely affected.</p> <p>It is also important that appropriate monitoring schemes are in place that will ensure the impacts of these proposals are appropriately evaluated.</p>	
<p>Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?</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>BCT sees the principle of a dynamic approach to land management outside SSSIs as achievable and pragmatic; a mosaic of habitats can be beneficial to some species. In order to ensure that local biodiversity and protected species are not affected, it is important to ensure that site biodiversity and local habitat dynamics are considered as this will vary from site to site. Furthermore, the success of this approach is dependent on the scale at which it is applied, which has not been made clear within the document.</p> <p>A dynamic approach to land management should not be implemented in such a way that will weaken the protection and status of existing habitats and species, which could occur if fragmentation is increased. The barbastelle bat (Annex II species) requires large areas of closed canopy woodland. Changing and/or insensitive management through the clearance of understorey or creation of woodland glades could, in some circumstances,</p>	

No	Question.
	<p>isolate a colony and destroy irreplaceable features. If the appropriate guidance is followed these features can be successfully buffered and/or incorporated into re-creation schemes without compromising the quality of re-created habitat.</p> <p>BCT would urge the FC to ensure that proposals take into consideration local characteristics, species present within a site and the role that the surrounding habitat provides. Appropriate assessments, consultation with relevant stakeholders and a robust monitoring scheme would ensure that these factors were considered, and biodiversity is not compromised by this attitude to land management.</p>
18.	<p>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?</p>
	<p>BCT do not consider this approach suitable for use on SSSIs.</p> <p>The re-creation of all priority habitats should be judged against UKBAP habitat definitions and favourable condition should be assessed using Common standards monitoring.</p>
<p>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</p>	
19.	<p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p> <p>-----</p>
<p>Different approaches to applying policy</p>	
20.	<p>Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?</p>
	<p>BCT does not support any of the approaches outlined in the consultation document.</p> <p>6.3.1 - Does not sufficiently address the issue of biodiversity and suggests that owing to a lack of resources it is acceptable for delivery at a lower rate.</p> <p>6.3.2 - This could have an adverse impact on species reliant on closed canopy woodland with a well developed understory. Decisions of this nature should be approached on a site by site basis in order to ensure that priority species are not negatively impacted.</p> <p>6.3.3 - Similarly, we feel that there should not be a threshold rate/limit of recreation as this should be considered on a site by site basis.</p> <p>The conservation status of all UK BAP species and habitats must be maintained in line with the EU's Habitats Directive. We would suggest that decisions seek to address commitments outlined within this Directive.</p>
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
	<p>BCT feel that the appropriate role of compensatory planting is to enhance and create connections and act as buffers around SACs supporting priority woodland species.</p>

No	Question.
	<p>Where appropriate, habitat creation should be undertaken at a landscape scale. If implemented correctly this may then help to increase the range of species regionally and nationally. Targeting woodland expansion in this way may also assist in achieving targets for other Biodiversity Action Plans (BAPs), especially where these relate to species listed under Annex II of the EU Habitats Directive such as barbastelle.</p> <p>We do not feel that 'like for like' planting should be employed as this could undermine the conservation and enhancement of native woodland. It is strongly recommended that native species such as oak and ash known to benefit priority UK BAP species are used.</p> <p>BCT would support this approach as long as proposals seek to deliver the best outcomes for UK biodiversity. This approach would rely on the successful co-ordination of schemes at a national, regional and local level to ensure that biodiversity is not compromised at any level.</p>
<p>Factors to consider when deciding which policy is likely to work best</p>	
22.	<p>Have we developed a reasonable set of questions for informing the decision on which policy is best? Do you wish to suggest any changes to the list of questions?</p>
<p>We welcome the consideration of a wide range of evidence and/or expert advice to develop or change this policy. However, positive factors such as the delivery of open habitats targets could be made clearer.</p>	
<p>Implications for delivery mechanisms</p>	
23.	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>
<p>BCT welcomes the acknowledgement that there are major gaps in evidence as to the magnitude and exact nature of the net benefits of open habitat restoration and expansion of wildlife.</p> <p>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.</p>	
<p>Other comments</p>	
<p>We welcome your input on any other aspect of this consultation.</p>	
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Please include the "information about you" form with your response.¹

Please send your completed forms to:

[Dominic Driver](#)

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¹ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.

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By 17.00hrs, Friday 5 June 2009.