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:	Tony Gent
Your organisation (if any):	The Herpetological Conservation Trust/ Froglife
Date:	20 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?

The HCT/ Froglife are keen supporters of the UK BAP and the targeted aproach used within it. Therefore we would seek the re-creation of the extent of open habitats identified within the BAP targets; we are aware that much of this could most effectvely be achieved from the restoration of open habitats from foresty plantations. The lower level given is unambitious and less than is currently being achieved - this would make little impact on restoration objectives. The rate of restoration should increase on current levels, i.e greater than 500 ha a year.

The net deforestation mentioned appears too simplistic and raises the issue as to whether enough woodland planting is being undertaken to address the BAP aspirations for woodland habitats and for the provision of amenity woodlands elsewhere; significantly we are usually addressing the need for a different type of woodland in a different place - and we support the rationale in the document about having the 'right trees in the right places'.

We recognise that the upper annual figure given may be difficult to achieve, and that there are uncertainites over funding. However the overall scale should be aspired to. It is important that there is an ambitious target underlying any policy. However we feel that there be a more comprehensive assessment of actual potential habitats, focusing on biodiversity value, and while working towards 3,000 ha a year should guide the implementation of a policy, this should be prioritised on the basis of its wildlife value, targeted to areas where the greatest benefits can be obtained and incorporated into a an appropriate cycle of forestry operations. Thus the rate per se will be less important than the achievement of overall outcome in the future.

Desired outcomes

No	Question.
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?

The desired outcomes identified in section 5.1 misses the main point and this undermines the value of this section. There are clear biodiversity and landscape benefits associated with open habitats; and this is the reason why we have promoted the need for this policy. There are only oblique references to this. This must be an EXPLICIT DESIRED OUTCOME and a key driver for this policy. We were disappointed with the tone set in this consultation, and disagree with some of the statements in the evdience, and the fact that the outcomes are described on the basis of perceived negative impacts rather than positive benefits.

Here we would expect to see outcomes such as:

* Expansion of open habitats: delivery of BAP targets

* increase in conservation status of charactersitic species associated with open habitats

* enhanced open landscapes and public amenity

* restoration of historic landscapes and improvement of ancient monuments

We agree that there should be no net adverse impact on woodland biodiversity, but this is not the place to do that 'balancing exercise'; this should be part of a holistic assessment of woodland and forestry policy (where we should aim to see a net increase in this habitat and associated species). The open habitats policy is needed to redress the historic lack of focus on non-woodland habitats within the forestry land holding and regulatory system; thus ensuring an appropriate integration of different biodiversity needs.

Within the conetxt of an overall woodland policy, we would see that the described outcomes would be appropriate.

Measuring the success of the policy

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

No: as above these are based around percieved negative outcomes rather than positive benefits. It is simply ludicrous to refer to woodland habitat targets, but not mention open habitat targets! There should be a clue as to this objective in the title of the Policy!

We are less bothered about the indicators that you have, than those that you have omitted. We suggest that there could be value in further discussion amongst stakeholders on how to develop these 'positive' measures of success (along with clarification of the objectives of the policy).

Policy proposals

Elements present in the policy

We will treat woodland and open habitats as potentially mutually beneficial

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?

There is no definitive 'yes' or 'no' answer: this is dependent upon the context and nature of habitats in question.

There is both a biodiversity and a public perception benefit in woodland and open habitats

No	Question.
being maintained in good condition side by side or intermingled as a mosaic: for example it will often be perceived more favourably for a wood to be 'opened up' to let light in, rather than clear-felled. Mosaic habitats and 'eco-tones' between habitats frequently offer more biodiversity opportunities that 'mono-cultures'. But there are equally cases where such 'ambiguity' may be detrimental, for example raised bogs, where a 'largely wooded' state would be inappropriate. Also, within the definition of 'open habitat' (e.g. 'Common standards' assessment for SSSIs) there is scope for some degree of tree cover and maintaining more than that amount may run a risk of degradation.	
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'?
Yes - as a principle. Generally these will be rich in biodiversity and the soils wil not be suitable for creation of extensive open habitats. However this shouldnot preclude the potential for such areas to contain open habitats as a mosiac within them, and open habitats within ancient woodlands are important for biodiversity.	
6.	What do you think of our proposed outline definition of 'mature native woodland'?
Yes, it works in the context of this policy. Importantly there is scope to address the 'exceptional circumstances' where such woodland could be removed. It might be important to identify such circumstance where 'open habitats' might take precidence, or provide guidance on how to address such conflicts,e.g where habitat linkage might be important (which could equally involve linking 'mature woodland' across 'open habitats' as linking open habitats though mature woodland).	
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?
Yes, but only where there is a clear promotion of the overall benefits of such a scheme, as part of a wider Government initiative. If done in a rather apologetic way this would serve only to raise concerns rather than promote the benefits. A strong policy basis will be needed to set the basis of public involvement - simply opening up a broad dialogue per se without such context will give mixed messages and raise inappropraite expectations.	
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?
Yes: this should be in the context of Regional Biodiversity plans/ objectives/ targets.	
We will apply a framework for evaluation to projects	
9.	Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?

No	Question.
The framework appears logical, but the test of its value will lie in the way in which the 'problem' and 'desired outcomes' are described and defined. We presume the term 'problem' is synonymous with 'issue/ challenge' rather than intentionally having a negative connotation. These must be based on a strong open habitats policy, in turn driven by BAP targets. 'Did it work' could be taken as disregrading an 'on-going' evaluation of the effectiveness of the process, but I think this is just being picky! We feel that Option 4 is likley to be most effective: this wil help promote the policy and generate buy-in and support as well as ensuing that we are colecively working towards a common goal.	
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?
As outlined in Option 4 (above). Guidance may be needed to clarify the BAP objectives to help define what could otherwise appear to be conflicting goals.	
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.	
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?
No:we feel that open habitat creation and 'net deforestation' are two separate issues.We agree that certain levels of trees and tree planting should be achieved, but this should not prejudice opportunities for open habitat restoration.	
12.	Do you consider that the proposed threshold is about right, too high or too low?
We do not agree to such thresholds - targets should be driven by Biodiversity Objectives and not limited by a threshold level.	
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?
As 11 & 12 above, we see these as two separate issues and there is a danger in trying to link one in a very literal way to the other in that this may encourage a 'laissez faire' approach to both issues. Both elements need to be adressed, but at geographically different locations. Biodiversity objectives are identified through BAP targets. Calculation of net carbon staorage gains from open habitats would be worth considering;	

No	Question.
peat bogs are very important carbon sinks - the impact of trees on these is largely negative.	
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?
We support exploration of options avaialble, fully costed in terms of carbon impacts, to address heathland management. We don't support the bland statement presented. Simply 'banning burning' won't solve the problem. Such best practice shouldbe developed and supported; alternative use of cut timber and brash should be considered, but the negative impacts of such activites (Damage to habitat, use of fuel, etc) also need to be costed into the equation. We believe there is huge scope for improving the situation, but it needs a coordinated thinking, proportional to the scale and likely impact of any operation, and provided ina joined up manner. For example, locally 'energy generating incinerators' could be justified and developed - but this would be beyond the abiltiy of any single practitioner to develop.	
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?
Such an evaluation will be valuable and we feel that this should address all aspects of 'carbon storage' and climate change implied by the change from one habitat (and for different tree species) to another should be addressed. The clear implication in question though is that carbon storage should be promoted as a reason not to create open habitats. Rather it should be used to help drive, and perhaps give renewed vigour to, a parallel programme of woodland creation with the 'right trees in the right places'. A need to address one environmental issue, should not be given as a reason not to address another.	
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?
See above. Are we achieivng the stated objectives of halting biodiversity loss? No! Are some of these losses associated with open habitats? Yes. Does more need to be done to conserve the biodiversity of open habitats? Yes. The question is not simply about trading one objective off against another!	
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?
We could, but it needs an objective basis. This basis should be geared to an assessment of 'favourable conservation status' of habitats and species. Unfortunately this evaluation	

No	Question.
has not yet been developed and therefore the short term beneit of looking at an SSSI type approach is the best available substitute at this stage. Conceptually we like the idea of a shifting mosaic of habitats, but will we ever have a large enough area to ensure that this dynamic system doesn't compromise habitats or species? Planning such a landscape could be difficult, and the very nature of 'open habitats' may require more resources to sustain them in such a dynamic system. Certainly our minds are not closed to such a concept but we'd like to to be sure that it could work and that we could sustain all biodiversity in such an approach. Count us in on any discussion about this!.	
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?
See above. Assessment couldbe against a suite of 'favourable reference values' for habitats and species, and it would be important to see that all are being delivered within the landscape.	
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?
Impacts wil be reduced short term by restoring habitats by harvesting 9an dnot replanting) at an appropraite 'economic time'. There should be a net increase in woodland in England through a coherent forstry policy; the location of this may shift but we would anticipate continued economic harvesting.	
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?
Disappointly we do not feel that we can support any of these. Again the biodiversity importance is being buried as a secondary consideration in light of messages that are clealry perceive as more important. The approaches should aim to provide 'win-win' outcomes and not always looking for trade-offs.	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
We disgaree with concept and connotations of 'compensatory planting'. We agree witheh concept that we sould see a net increase in woodland cover. Linking the need for the creation of one habitat to 'compenste' for the creation of another is perverse as it it implies 'punative' measures for those takingforward one element of Government policy/ obligations, but not others. It would be equally perverse to expect woodland creation schemes in some areas to compenste by removing trees from others - but the logic is consistent.	

No	Question.

We would expect the 'balanc'e between tree planting and tree removal to be part of a coherent policy - taking full account of biodiversity and other socio-economic needs.

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?

More or less, but needs tweaking! Although the first questions do provide some very positive reference to gains, and at last a consideration of increase in area and connectivity, etc , we feel that a. there needs to be a stronger basis for apprecaiting the magnitude of the conservation need and b. this only works when considered as part of a wider policy basis in which woodland creation is also consdiered. For example, the net impacts relating to climnate change and impact on woodland bidoviersity need to be considered in the light of woodland creation policies.

The headings and implications behind the questions have very negative connotations. 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; stand alone there may be a tendenacy to view creation of 'open habitat' might as a cost burden, or negative cabon balance, but if other policies are working along side it then the net impacts of the programmes when veiwed together are 'win-win'.

Implications for delivery mechanisms

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

The emphais on biodiversity needs to be stronger.

Recognition of the relative merits of re-creation of heath from recently planted woodland over other habitats, such as agriculturally imporved land, should be graeter.

The policy should look at the regualtory and support role provided by the Forestry Commission, notably felling licences and grant support, but also assitance from officers. There needs to be a continuing shift in mindset for helping the creation of open habitat from woodland within the FC so that the processes are easier to implement and are supported.

Grant support, both administered by FC and by others (e.g. Higher Level Stewarsdhip managed by Natural England), needs to be suffiient to cover large scale conservation projects.

Other comments

We welcome your input on any other aspect of this consultation.

The policy could help provide a framework for a more consistent approach across Governmental agencies in developing and delivering open habitat conservation; for example the oucome of this process couldheklp align thinking and approaches on 'favourable conditon', developemntof conservation targets, exchange of information, and targeting funding prioirites.

Key to the success of this might be a better developed information exchange

No	Question.
network, for example record centres, NBN, specialists schemes/ societies, to allow objective assessment of the effectiveness of this policy. The links of such a policy to wider biodiversity strategies and actions therefore need to be considered and recognised.	

Please include the "information about you" form with your response.[1]

Please send your completed forms to:

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By 17.00hrs, Friday 5 June 2009.

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