

APPENDIX 3 - Consultation Record

Consultation conducted via Citizen Space between 6th March 2019 and 22nd April 2019



Consultee Name	Consultee Comment	FE Response
STATUTORY		
Devon CC	No Response	-
Natural England	No Response	-
Historic England	No Response	-
East Devon DC	No Response	-
Char Valley Parish	No Response	-
Lyme Regis CP	No Response	-
Uplyme CP	No Response	-
Colyton CP	No Response	-
Southleigh CP	No Response	-
Offwell CP	No Response	-
Farway CP	No Response	-
Sidmouth CP	No Response	-
Ottery St Mary CP	No Response	-
Devon Access Forum	<p>The Devon Countryside Access Forum has confined its comments to question 4. on the on-line survey. This response will be on the agenda for formal approval at the next Forum meeting on 25 April 2019.</p> <p>Recreational Access</p> <p>The Devon Countryside Access Forum welcomes the recreational access opportunities provided in the Forestry Commission woods in East Devon and notes that several of the woodland areas are open access.</p>	Noted

Consultee Name	Consultee Comment	FE Response
Devon Access Forum continued	<p>The Forum supports the objective of ‘the provision and maintenance of recreation facilities’ and would encourage any improvements where these are compatible with other social, economic and environmental land management objectives. It understands that there is likely to be reduced capacity to achieve this in the woodland areas which are leased.</p> <p>Plan objectives and vision</p> <p>A number of other statements in the 50 Year Vision and objectives accord with the Forum’s remit to improve public access to land and the enjoyment thereof, notably:</p> <ol style="list-style-type: none"> 1. The widening of rides and increased sunlight, together with opening up viewpoints into the forest and out into the landscape; 2. improvements to biodiversity and more mixed woodland species; and 3. maintenance and enhancement of cultural and heritage assets. <p>The overriding principle for the forest to be a ‘popular and safe place to come to exercise, learn and relax in a resilient natural environment’ is a key message.</p> <p>Matters identified for inclusion in the Forest Plan</p> <p>The Forum has identified several matters which should be mentioned in the Plan and considered as part of its implementation.</p> <ul style="list-style-type: none"> • Access use <p>The Plan includes references to open access land and a number of public rights of way. However, it only mentions walking and cycling. It is not clear where horse-riding and cycling are permitted, other than on bridleways, and whether there is potential for improved equestrian use (including carriage-driving) and cycling on other routes within the forest area. The Forum advises the Forestry Commission to consider additional uses on existing paths and especially where rides are being widened. Access users increasingly welcome safe and quiet off-road routes.</p> <p>Dog walkers are the major recreational access group and it would be helpful for the Plan to refer to this group of users and policies/codes of conduct encouraging responsible dog walking.</p> <p>There will be an increased range of mobility scooters available in the future and more people using them to access the countryside and forest areas. The Devon Countryside Access Forum’s Position Statement on Disability Access is attached.</p> <p>Maps of each woodland area showing the public rights of way through the wood, or adjacent to it, would be useful.</p> <ul style="list-style-type: none"> • Parking <p>There is a reference to improving car park aesthetics. It is not clear from the Plan whether any new car parks are being proposed. The Forum advises that any enhancements should take account of the needs of disabled visitors with wheelchairs, mobility scooters or tramper buggies, and ensure there is easy access from car park areas to paths. Earth bunds, narrow gates, erosion gulleys, large boulders and padlocked barriers are particularly problematic.</p> <ul style="list-style-type: none"> • Neighbouring landholdings <p>Where there is potential to improve recreational access provision in association with other landowners, particularly authorities or charities, the Forum advises the Forestry Commission to explore options.</p> <p>The Forum would welcome feedback on its comments.</p>	<p>Comments acknowledged</p> <p>Page 4 now reads: <i>These woodlands and the rights of way which bisect them are popular for quiet cycling, riding and walking with views to the Jurassic Coast.</i></p> <p>Engagement is ongoing through Devon Loves Dogs and comment acknowledged, however the Plan covers the land management proposals for the coming 10 years and does not define strategy for recreation in the Forest.</p> <p>Noted.</p> <p>Readers and visitors are advised to refer to Ordnance Survey Public Rights of Way maps</p> <p>Noted. No new car parks proposed.</p> <p>Noted and in progress.</p>

Consultee Name	Consultee Comment	FE Response
NGOs		
East Devon AONB	No Response	-
Dorset AONB	<p>These comments relate to the plantations at Wyld Warren, Hole Common, Monkton Wyld & Whitty Hill, which are within or close to Dorset AONB. In general terms, the AONB Team views those aspects of the Plan positively affecting the Dorset AONB positively. However, the following issues are considered to require further consideration:</p> <ul style="list-style-type: none"> The specific details of broadleaf species that will be used are not provided. The Team would be happy to provide input on the species as required. Typically, we do not support clear felling due to adverse visual impact. However, where such clear felling will lead to more rapid establishment of replacement broadleaf woodland, we would consider the benefits to outweigh the impact. Where the plan proposes clear felling prior to restocking with conifers, we would support amendment of the Plan to continuous cover. The woodlands contain a number of Sites of Nature Conservation Interest (SNCIs). We consider that there may be good grounds to treat these areas in a similar manner to that proposed for the PAWs areas, as such an approach would be likely to enhance the nature conservation interest of these sites. A key feature of interest within planted areas such as Wyld Warren and Monkton Wyld is the presence of many springs and flushes. These have some similarity with the more extensive mire features of the heathlands of SE Dorset, but the underlying Lias Clays in this far western part of Dorset mean that in general the water is less acidic than in the classic heaths, and thus supports a slightly different and unusual vegetation. These 'Wyld' areas, and Champernhayes a little to the east, feature much in the old (pre-afforestation) floras as notable biodiversity hotspots with many characteristic and often restricted species of vascular plants and bryophytes present. The Forest Plan does give some mention of open patches being restored but there is no reference to the spring and flush features that are such an important element of the natural history and landscape character of the area. The trees planted on these wet sites are often toppling because they are rooted in such unsuitable substrate and the nature of the terrain probably means that harvesting from these sites would be hardly economic or efficient. It would be very good to see a real focus on restoring all of these wetland features as open patches, even if some justification can be made for maintaining an otherwise overall discordant conifer presence in the wider woodlands. It seems very unlikely that loss of the planted crops on these wet features would be of any significance to forestry, but the gain for biodiversity would be very important and give rather more credence to the often-quoted FC philosophy of 'right tree in the right place'. 	<p>-</p> <p>See pages 21-25 and 28-39 which proposes both broadleaf and conifer trees to be planted, we are unable to define the composition of regeneration.</p> <p>A mixture of silvicultural systems have been proposed as defined by the stand's capacity for transformation to CCF, as well as the ecological value to specific species, accessibility constraints, water regulation and the landscape impact.</p> <p>Noted, sites will be mapped in our GIS system so that they can be considered and enhanced at the time of intervention.</p> <p>See page 35 – <i>Riparian zones will be developed to create and maintain areas of up to 50% continuous forest cover through gradual regeneration or enrichment with site appropriate tree species, such as Alnus, Salix and Ulmus spp. A gradual change to this type of wet woodland habitat through heavy thinning at the time of intervention (usually clearfell), will create an environment of dappled shade with good light penetration and aeration as well as buffer the riverine systems from forestry operations.</i></p>
Woodland Trust	No Response	-

Consultee Name	Consultee Comment	FE Response
RSPB	<p>General comments</p> <ul style="list-style-type: none"> The RSPB recommends specific recognition of lowland heathland as an important ecological habitat. For example, while the Summary recognises the Plan area includes areas of Wet Woodland and Lowland Mixed Deciduous Woodland (both priority habitats/habitats of principal importance (s41 of NERC Act 2006)), it also includes areas of existing Lowland Heathland, which has the same priority status. While the Plan does mention open habitats and includes some proposals for related management and creation, we recommend that the Plan is amended so it acknowledges the need to manage existing areas of lowland heathland in the Plan area and FE take opportunities to restore more lowland heathland where afforestation has occurred on previously open heathland areas. This is in addition to open habitats/heathland being a stage in the cycle of clearfell and re-stocking/re-generation. The RSPB supports the objective to produce woodlands with increased conservation benefits and our comments on the Plan are focused on maximising opportunities to create additional as well as retain existing biodiversity value. In 'A 50 year vision', the RSPB recommends including reference to the 2019 East Devon and Blackdown Hills Landscape Character Assessment's aspiration to retain or reinstate open plateaux on hill tops and ridges. The relevant Assessment aims include enhancing biodiversity through "continued positive management of heathland, grassland and woodland/plantation habitats". This is, for example, relevant to some sites in the Plan area, for example, the higher parts of East Hill ridge including Fire Beacon plantation. In 'A 50 year vision' the RSPB recommends specific reference to nightjar. This biodiversity priority/species of principal importance has been recorded at several of the sites in the Plan area (for example, East Hill, Trinity Hill and Wyld Warren all contained breeding territories when surveyed in the last national survey in 2004). Other sites may also support nightjar (the last survey did not include all potential nightjar habitats). Nightjar occur in plantation sites at particular stages in the clear-fell cycle (after felling and before new tree planting or re-growth develops to a closed canopy) and on heathland/open habitats within plantation sites. However, Continuous Cover Forestry management is not likely to be suitable for nightjar so we recommend CCF is not increased where there are opportunities for retention/creation of nightjar habitat. In 'A 50 year vision', the RSPB supports the commitment to widen the ride and track network. Such corridors can be of most benefit to a range of biodiversity where they are generally wider than the mature height of trees growing near them. The structure of vegetation alongside rides and tracks should ideally transition from woodland to scrub to grass margins (but not in a regular/regimented way) and then bare ground bordering stone tracks. 'Wavy' edges where vegetation grows nearer to tracks and rides in some places and in others larger areas of open habitats bordering rides and tracks help create different microclimates, and sunny and sheltered areas, and also avoid funnelling effects of wind. There is helpful information in Design and management of environmental corridors (Lucas, 2006). A rotational management approach (eg, mowing/cutting alternate sides along or sections of tracks/rides, or use of grazing animals where appropriate) is best as this ensures that there is always a range of ages/growth state of adjacent vegetation so species - some of which may not be particularly mobile including some invertebrates - always have some suitable habitat year to year. Management should provide for any priority species present. We recommend implementing relevant management set out in the Woodland Wildlife Toolkit (produced by a partnership including Forestry Commission England), including on managing tracks and rides, and for clearfell and open habitats https://woodlandwildlifetoolkit.sylva.org.uk/advice-management The toolkit also has advice on managing for a range of priority species, some of which are relevant to sites in this Plan. 	<p>Page 35 now reads, <i>A number of remnant and restored fragments of lowland heathland are found at the higher elevations of the Plan area. These are typically made up of an assemblage dwarf shrubs such as heather and gorse as well as grasses. Managed as permanent open habitat with no more than 20% tree cover through mechanical cutting of regenerating tree species, the plan will aim to connect these areas through a well managed ride network.</i></p> <p>Acknowledged</p> <p>Page 6 now reads, <i>In addition, this Vision will deliver a 'Landscape Aim' of the Character Assessment which is that biodiversity should be enhanced through continued positive management of heathland, grassland and woodland/ plantation habitats.</i></p> <p>Vision acknowledges nightjar population as follows, <i>areas of conifer dominated forest managed through continuous cover forest techniques or clearfell/restock will become a home for numerous conifer and edge loving species such as bats, nightjar and raptors.</i></p> <p>Comment acknowledged.</p> <p>Noted.</p>

Consultee Name	Consultee Comment	FE Response
<p>RSPB continued</p>	<ul style="list-style-type: none"> Management objectives - We recommend amendment to the Venn diagram illustrating the management objectives so that the presence, conservation and enhancement of wildlife is also included in the People section. There is considerable evidence that contact with nature is an attraction for and proven benefit for people as an important component of the benefit of spending time outdoors. Therefore woodlands that are wildlife-rich and managed so that people have an opportunity to see or hear a range of wildlife (such as birds, butterflies and reptiles) as they walk around on tracks and paths or other permitted access areas have greater value. We also recommend the Nature section has a specific objective to protect, enhance and restore areas of open habitat, such as heathland, within sites where such habitat occurs or used to occur. In the Meeting Objectives section we recommend open habitats are mentioned in the Meeting Objective column for the Forest Plan Objective for “the protection and enhancement of woodland and open spaces and their associated species” as there may be a risk that lack of specific reference here could result in opportunities for enhancing open habitats being overlooked in a focus on restoring ancient woodland. In the Meeting Objective section we support the Forest Plan Objective to protect and enhance the external landscape. To that end, we recommend priority is given to increasing area of open habitats on some sites, in conjunction with restoring the open nature of hilltops and plateaux, as proposed in relation to part of Fire Beacon plantation on East Hill. The UK Forestry Standard (4th edition, 2019) states in Forest Structure that 10% is the required minimum of open ground, or land managed specifically for the conservation and enhancement of biodiversity and we recommend FE aim to exceed this wherever possible. <p>Specific site comments</p> <p>East Hill</p> <ul style="list-style-type: none"> We welcome and support the proposal to create 70% open habitat on the c5 ha of Fire Beacon plantation scheduled for felling 2022-2026. We recommend this is targeted at the higher plateau area and so open habitats could be linked with habitat on the adjacent Fire Beacon Hill LNR. RSPB recommends clearfell instead of CCF where compatible with flood risk mitigation. Nightjar breeds at this site and can utilise the suitable habitat created as part of the cycle of rotational clearfell/regeneration or replanting whereas CCF is not likely to provide those nesting opportunities. The plateau areas are best suited to consideration of creation of open heathland habitat, as discussed separately with FE in connection with proposals for more extensive management of Fire Beacon Plantation and Fire Beacon Hill LNR. We recommend the statement “Proposals will look to complement these valuable habitats [remnant and restored lowland heathland] at the time of re-stocking” is made a firm commitment to do that. <p>Trinity Hill</p> <ul style="list-style-type: none"> Trinity Hill LNR is contiguous with the plantation on three sides and nightjar were recorded on parts of the plantation in the last national survey in 2004. We support the commitment to complement and aim to enhance the LNR. We consider this is most effectively achieved by increasing the proposed % of open habitats on the plantation in the proposed felling cycle for 2022-2026. We recommend increasing the open habitat from 10% to 30%. This may be partly achieved by widening tracks and rides and creating larger open areas and ensuring connectivity with the LNR. 	<p>Appreciate that the Venn diagram is fairly binary and that all objectives could fall across all key themes. i.e. timber production and climate change, employment and sustainable livelihoods etc.</p> <p>Current objective is sufficient making specific reference to open ground, as follows, <i>The protection and enhancement of woodland and open habitats and their associated species</i>. Where open ground is a substantial component of the Plan area or the intention is to dramatically increase open space then we use a specific objective.</p> <p>Page 8 now reads as a measure of success in Meeting Objectives, <i>15ha of open space creation at the time of restocking</i>.</p> <p>Noted.</p> <p>The Plan looks to deliver this with 13% of felled land during Plan period being left as open ground at the time of restocking.</p> <p>Noted.</p> <p>A mixture of silvicultural systems have been proposed as defined by the stand’s capacity for transformation to CCF, as well as the ecological value to specific species, accessibility constraints, water regulation and the landscape impact.</p> <p>Acknowledged</p> <p>Proposal is currently for 10% open space, and 10% broadleaf regeneration, to create a diffuse edge between conifer crop and open heathland.</p>

Consultee Name	Consultee Comment	FE Response
<p>Dorset Wildlife Trust continued</p>	<p>Summary of SNCI Interest</p> <p>Dorset notable plants are those associated with good quality wildlife habitat that has largely escaped agricultural improvement or in the case of woodland associated with ancient woodland. As such they tend to be of a restricted distribution and often in local and/or national decline.</p> <p>SY39/048 Wyld Warren SNCI</p> <p>The trackside (referred to as the husky track in the Plan) and wooded streamside within this part of the plantation support relict heath and wet woodland respectively. The heathland includes Ling, Bell Heather and 5 Dorset Notable plants; Bristle Bent, Star Sedge, Western Gorse, Tormentil and the more uncommon Bilberry. The wet woodland comprises Alder, Birch and Grey Willow over a rich flora with 10 Dorset Notable plants including Smooth-stalked Sedge, Greater Tussock-sedge, Marsh Violet, Opposite-leaved Golden-saxifrage and, in the drier areas, Wood Anemone, Bluebell and Hairy Woodrush</p> <p>Management Issues: Rhododendron and Bramble abundant in some areas</p> <p>SY39/051 Dodpen Hill SNCI</p> <p>Again this is important for a strip of wet woodland that occurs along the streamside on the western side of the hill and for a wet flush near Dodpen Farm. Alder, Ash, Grey Willow and Birch occur over a rich and diverse flora with 14 Dorset Notables including Opposite-leaved Golden-saxifrage, Marsh Violet, Yellow Pimpernel, Smooth-stalked and Greater Tussock-sedge and an abundance of bryophytes including the Bog moss Sphagnum squarrosum. The Alder dominated flush near Dodpen Farm supports populations of Royal Fern and the very uncommon Wood Horsetail. The drier mixed plantation between the streamside and flush includes Bluebell and Wood Sorrel</p> <p>Management Issues: Occasional to locally abundant Rhododendron and Bramble and planted Beech and Norway spruce in the wet woodland</p> <p>SY39/028 Monkton Wyld Wood SNCI</p> <p>Part of this SNCI appears on the Ancient Woodland Inventory, but again the major interest is associated with a flushed area near the stream where a rich and diverse flora includes 20 Dorset notables. Opposite-leaved Golden-saxifrage, Marsh Violet, Marsh Valerian, Smooth-stalked Sedge, Greater Tussock-sedge, Wood Anemone, Yellow Pimpernel and Wood Speedwell are just some of the species that occur here beneath a canopy of Alder, Downy Birch and Grey Willow (with occasional Ash and Oak). Bluebell and Great Wood-rush occur in the drier areas whilst the ride supports an interesting flora with Heather and Bilberry and, in the past, Hay-scented Buckler-fern</p> <p>Management Issues:</p> <ul style="list-style-type: none"> • Still some conifer in wet species-rich area but suggest not too much intervention • Himalayan Balsam becoming established in the wet area and Rhododendron and Bracken in previously open areas. <p>SY39/050 Hole Common</p> <p>Within this plantation there remain pockets of semi-natural woodland comprising Ash, Downy Birch and, in the streamside flushes, Alder. There is also occasional Oak, including some large veterans with good deadwood habitat. A rich flora in these areas includes 22 Dorset notables with Wood Sorrel, Wood speedwell, Yellow Archangel, Bluebell, Sanicle, Tutsan, Early Purple-orchid, Opposite-leaved Golden-saxifrage, Yellow Pimpernel, Meadowsweet, Greater tussock-sedge and Marsh Violet some of those species present</p> <p>Management Issues: Spread of Cherry Laurel and Rhododendron and veteran trees shaded.</p>	<p>Noted, FE to request shapefile of these SNCIs to be input into GIS system so that they can be considered, issues addressed and features enhanced at the time of intervention.</p>

Consultee Name	Consultee Comment	FE Response
OTHER		
Member of Public	<p>Not a single mention of public consultation or engagement.</p> <p>Whole assumes traditional i.e. production of sawmill quality timbers and none for a ternative uses.</p>	<p>All Parish Councils and Statutory Authorities within the Plan area were notified at the outset of the plan process. Notable additional stakeholders were also contacted. Notices were erected on all major access points to the forest to ensure as many stakeholders as possible were notified.</p>
Member of Public	<p>There should be no felling between Feb and Mid August. This is to insure no protected bird species are affected and avoid the disaster last year where felling took place in JUNE and disturbance resulted in significant nest failures/death of young in nest.</p> <p>Where is the new planting of ADDITIONAL forest? How does the plan address climate change and the need for additional trees? Where is the potential for new forest planting in East Devon? What work has been carried out with landowners to address this issue?</p>	<p>FE follows best practice guidance with regard both European and nationally protected species. Best practice does permit felling operations in bird nesting season provided comprehensive surveys have been carried beforehand and avoidance and mitigation is in place.</p> <p>No additional forest is being proposed, we do not have the land available.</p>
Member of Public	<p>I am not familiar with all the woods/forests listed but I know Trinity Hill well and have found few forests as poorly managed as this one. The pines are far too dense to allow reasonable growth and have obviously been poorly managed for years. A small plantation of eucalyptus trees appear to have not grown at all in the 3 to 4 years I have frequented this area so obviously not suited, on the few occasions logging is carried out the damage done to paths and trails is never repaired following completion of work or logging. I look forward to any future improvement propositions.</p>	<p>Noted, the Plan and its associated management seeks to find a balance between the economic, natural and social demands on the land management decisions for the Forest.</p>