

APPENDIX 4 - Consultation Record



Consultee Name	Consultee Comment	FC Response
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STATUTORY

Devon CC	No Response	-
Devon CC	No Response	-
Natural England	No Response	-
Exeter City Council	This Plan addresses the needs and interests our organisation well	Acknowledged
East Devon Council	No Response	-
Teignbridge Council	No Response	-
Whitestone CP	No Response	-
Huxham CP	No Response	-

OTHERS

Member of the Public No. 1	Hello. This comment is about Stoke Woods, as the only one of the areas i know well, but will translate to the others too. I have noticed that a number of the trees have been marked for felling. This looks like a good selection to enhance the woodland eg allow a better ground flora. I am concerned that some of the trees marked are of poor quality when it comes to timber but are fantastic for birds, dormice and bats. Please don't fell all trees that are full of holes etc as these provide valuable habitat. This is obviously for those trees that door not pose a risk to people if they are unsafe. The wood is a beautiful place but also a vital area for wildlife around our city. Thank you for your time.	<p>Comment has been passed to the Beat team, but for reassurance the management deadwood within Stoke Woods and resultant operations is covered on page 27 and follows Forestry Commission Practice Guide on <i>Managing deadwood in forests and woodlands</i>. This Guide follows UK Forestry Standard guidance, in particular,</p> <p><i>Leave a proportion of standing and fallen deadwood: concentrate it in areas of high ecological value, where there is existing deadwood and where linkages can be provided between deadwood habitats – avoid uniform distribution across the forest management unit.</i></p> <p><i>Retain existing veteran trees and select and manage suitable individuals to eventually take their place.</i></p>
Member of the Public No. 2	<p>1. I would fully support removal of planted conifer stands from Stoke Woods and the other sites, and return to native woodland as per PAWS policy.</p> <p>2. The reference to the NDMP dormouse nestbox scheme at Stoke Woods on page 17 of the document is noted. I would like to comment as the person responsible for carrying out those NDMP checks as a volunteer for Exeter City Council countryside service for the past 13 years. For information, at Stoke Woods, clearance in compartments 8020 / coupe 80068 and 8022 (pages 25 and 41) will affect areas where dormouse boxes are located, and where we have recorded dormice regularly. In 8020 / coupe 80068, boxes have been occupied each year that I have been involved in surveys. In 8022, where I understand more extensive clearance is planned, boxes have been less frequently occupied in recent years though dormice were present in boxes in this area in the Oct 2017 check.</p>	<p>1. Acknowledged</p> <p>2. Comments passed to Beat team so that this information can be input into the Operational Planning process</p>

Consultee Name	Consultee Comment	FC Response
Member of the Public No. 2 cont.	<p>3. I am aware much of area due for clearance in 8022 is holly and secondary sycamore, not hazel coppice with standards typically considered as optimal dormouse habitat. However I would make the observation that hazel coppice and standards is not the only known habitat for dormice in Devon, which can be widespread in hedges and scrub, with growing recognition that populations can subsist among conifer plantations, and are not limited to ancient woodland types. In this context I would question the graphic on page 31 which shows 'favourable' dormouse habitat in the southern extreme edge of site, and 'potential' elsewhere; we know dormice are present throughout where the NDMP nestboxes are located, while these boxes do not take in any of the areas denoted as 'favourable' on the map.</p> <p>4. For all three sites, I would suggest it should be assumed dormice are present throughout the proposed work areas, and that this has implications for how the works are to be carried out. I would endorse following the best practice procedures and safeguards to avoid threat of harm (cited on page 31), as given in the Dormouse Conservation Handbook, for example, phased operations, and leaving selected overhanging coppice stems to maintain understorey connectivity, to complement the proposed Environmental Corridors. I would warn that winter clearance of areas by machinery presents a relatively high risk of crushing dormouse hibernation nests.</p> <p>5. For our NDMP nestbox scheme at Stoke Woods, I would anticipate it is quite likely that works will affect occupancy of the dormouse boxes in the short-mid term.</p> <p>6. From experience of witnessing the results of small scale coppicing works at Stoke Woods, I would strongly recommend protective fencing for any coppiced stools or areas. From what I am aware, wherever coppicing has been attempted previously, regeneration has been slow or non-existent after 5 or even 10 years, due to all re-growth being browsed off by deer.</p> <p>7. I would also note that regeneration may be inhibited at Stoke Woods because of the site's north facing sloped aspect, which causes canopy trees on the slope above to shade out understorey and ground layers lower down. Removal of canopy trees on the upper slopes, as well as the planned coppice maintenance, may then be needed to allow light to reach the woodland floor. I wonder if this factor might influence, for example, the location and numbers of canopy trees to thin, and length of hazel coppice rotation, if understorey and field layers are taking longer to regenerate due to topography.</p> <p>8. Lastly I would like to make a strong recommendation in relation to retention of dead wood habitats, and especially dead standing wood, at all three sites. I was previously informed about proposed future management works, and asked to check whether any of our NDMP dormouse box locations are near to areas with trees marked for removal. I greatly welcome following the Humphrey and Bailey 2012 guidelines (pages 17 and 30 'Deadwood'), retaining dead wood except where unsafe. However several mature dead standing trees or trees with damaged and dead branches appear to be marked up for removal. I would wish for all trees such as these to be retained in situ, with, strictly only if necessary, selective removal of branches where needed for safety reasons. The marked up trees do not seem to me be near any public paths or trails, have minimal or no leaf canopy to cause shading, and would be important habitats for specialist invertebrates, mosses, lichens, nesting birds, roosting bats, as well as nesting dormice; this dead wood habitat resource represents some 100-200 years of growth and could not easily or quickly be replaced.</p> <p>9. As part of forthcoming works I would ask if creation of more dead wood habitats can be considered, for each of the sites, through, for example, leaving, instead of removing, cut timber, and artificially damaging / ageing ('veteranising') and ringbarking selected standard trees to develop standing dead wood gradually.</p>	<p>3. Nestboxes do not necessarily qualify areas for 'favourable' or 'potential' habitat. However for clarity page 28 now states <i>favourable habitat is found throughout the Plan area and dormice are known to be inhabiting the woodlands some of which use National Dormice Monitoring Programme nestboxes.</i></p> <p>The map has been updated to remove reference to potential habitat, and identify all areas of broadleaf dominated woodland as 'favourable habitat'</p> <p>4. Acknowledged, management will follow joint FC and NE Guidance on managing woodlands with dormice in England, v2 2007.</p> <p>5. Acknowledged</p> <p>6. The need for fencing is acknowledged on page 35.</p> <p>7. Aspect, microclimate, soils, moisture regime and overstorey conditions will all be contributing to the success of regeneration. This is addressed on Page 18 where it states <i>areas will be thinned heavily to release ancient woodland remnants and features and to encourage natural regeneration and intrusion in to the non-native crop.</i> This work is further enhanced by the group felling of shade casting species often situated on higher reaches.</p> <p>8. Comment has been passed to the Beat team, but for reassurance the management deadwood within Stoke Woods and resultant operations is covered on page 27 and follows Forestry Commission Practice Guide on Managing deadwood in forests and woodlands. This Guide follows UK Forestry Standard guidance, in particular,</p> <p><i>Leave a proportion of standing and fallen deadwood: concentrate it in areas of high ecological value, where there is existing deadwood and where linkages can be provided between deadwood habitats – avoid uniform distribution across the forest management unit.</i></p> <p><i>Retain existing veteran trees and select and manage suitable individuals to eventually take their place.</i></p> <p>The marking of trees was indicative and should be considered a 'first draft'. It is normal for the Operational Planning stage to amend the original marking and the comments received here will help inform that process. Note: Marking can also be used to indicate a boundary and so trees that are to be retained may also receive some marking.</p> <p>9. As per point 8.</p>

Consultee Name	Consultee Comment	FC Response
Member of the Public No. 3	<p>We are responding to the consultation on the FC holding in Mid Devon, specifically in relation to Whitestone Woods, which we are familiar with as local residents with a strong interest in nature conservation. We are obviously more familiar with the Whiptail Wood area due to difficulties of access in the remaining areas.</p> <p>These are rich areas of woodland with a diverse wildlife interest. We note the intention to maintain and gradually expand the area of deciduous woodland and we absolutely welcome and support this direction of travel. We do however note the rather modest aspirations to increase deciduous cover across the Whitestone/Oldridge complex from c 43% now to 54% by 2048. The maps for Whitestone in particular show rather limited change during this 30 year period. So we would urge you to consider enlarging the ambition for change over this period, focusing in particular on</p> <ul style="list-style-type: none"> - enhancing deciduous cover along the stream valleys where rich wet woodland areas thrive, as noted in the plan - enlarging the ambition for expanding ride width and associated management for butterflies in particular species such as white admiral and silver-washed fritillary which occur in the woods - ensuring increased abundance of dead wood habitats for invertebrates and birds including lesser spotted woodpecker, a now rare bird which is certainly present in the woods although we are unclear of its status <p>The other point we would make is that some of the woodland areas retain remnant features of a more open, acid habitats with the existence of ling and bilberry amongst other plants. we believe is that some areas were opened up more these would flourish and encourage an associated fauna and flora. While we recognize that this is primarily a production woodland the expansion of modest open habitat could create a much more diverse ecosystem. The area around the woods of a stronghold for woodlark, a rare bird in Devon. It may use open areas within the woodland if they were created. The area where this is most apparent that we are aware of is in compartment 8003 in Whiptail Wood to the east of the public footpath (there may be other even more suitable areas elsewhere in the complex that we are not familiar with). We would propose that you trial a modest area within 8003 to test the ecological response from creating more open habitats.</p> <p>I hope that these comments are helpful. Happy to enlarge or explain our comments if necessary</p>	<p>Gradual restoration is broadly recognised as a the most ecologically sustainable and resilient form of ancient woodland restoration. This form of restoration has already begun and continued restoration is going to take a considerable amount of time and resource because of the limited native remnants from which sites can regenerate.</p> <p>Whilst a 11% increase may seem modest this equates to 26 hectares of restored woodland by 2048.</p> <p>The restoration programme looks to stimulate regeneration within the richer more broadleaf abundant stream valleys as well as use these as building blocks for future restoration. As stated on page 18 <i>These areas will be thinned heavily to release ancient woodland remnants and features and to encourage natural regeneration and intrusion in to the non-native crop. The anticipated time scale for establishment of predominantly native species is expected be around 50 – 60 years or so, but could be as long as 70 - 80 depending on success of establishing the future crop.</i></p> <p>Ambitious corridor plans which benefit ecology are defined on page 27.</p> <p>Management of deadwood is covered on page 27 and follows Forestry Commission Practice Guide on Managing deadwood in forests and woodlands. This Guide follows UK Forestry Standard guidance, in particular, <i>Leave a proportion of standing and fallen deadwood: concentrate it in areas of high ecological value, where there is existing deadwood and where linkages can be provided between deadwood habitats – avoid uniform distribution across the forest management unit.</i></p> <p><i>Retain existing veteran trees and select and manage suitable individuals to eventually take their place.</i></p> <p>The Plan was written in line with FC Open Habitats Policy, 2013. Sustainable permanent and transient open habitats are to be delivered through the environmental corridors policy and programme. Including within Compartment 8003</p>
Member of the Public No. 4	<p>I believe that the Forestry Commission Management Plan is destructive, heavy-handed and does not honour the obligations which have to be met by others when conserving and protecting a SSSI. I have included recent examples of flouting of Natural England's rules/guidelines (Pg48 of Plan), in a Post Script.</p> <p>It seems that the designation of this SSSI is being stretched and rewritten to assist felling; felling being the most important goal with income in mind.</p> <p>This site was first designated in 1952 for many reasons: its diversity of habitats and species in a small area makes for an excellent study facility. Undisturbed soils with original pedological profiles still intact make the site a rarity so close to a city. Not so in this Forestry Commission Plan. It is declared in a brief, sweeping statement and diagrams that now, under its management, all areas are accessible with a JCB because its all in a an 'unfavourable recovery position'! According to this Plan it really all needs regenerating, not by subtle restocking or thoughtful underplanting, but by felling. Yet on pg 17 this failing woodland has 'an increasingly abundant and diverse understorey' all due to 2006 thinning and felling whilst in a diagram and in other statement is still considered to be unfavourable. This might, in itself indicate that the JCB approach is, perhaps, a bit much!</p>	<p>Natural England determines the condition of the SSSI (i.e. Favourable or Unfavourable), as well as approving and monitoring all planning and operational works that go on within the SSSI. Replanting with native species with a different seed source and provenance is not endorsed within SSSI's in order to protect distinct features unless the SSSI is declining. Therefore as stated on page 35 <i>Minimal replanting should be required given the sites propensity to naturally regenerate oak and hazel. Consider enriching in clusters with Pedunculate oak, elm, cherry and wild service.</i></p> <p>The removal of conifer seed trees is a critical factor in reducing the seed burden and moving the site rapidly to Favourable status.</p> <p>Note: the increasingly dense understorey occurs where felling took place in 2006 and not in the areas untouched where ground flora and regeneration are both minimal. NE will be unable to classify the site as Favourable until more conifers are felled. The designation will be given to the woodland as a whole rather than individual units, as per NE quote:</p> <p><i>"Some stands of conifers still remain and in places Sycamore is frequent - as a result the targets for species composition of canopy & shrub layer are not met but the planned programme of woodland restoration will bring about recovery in the long term."</i></p>

Consultee Name	Consultee Comment	FC Response
Member of the Public No. 4 cont.	<p>The Plan declares that the wood is not known for its veteran trees, nor will it ever be if this level of broadleaf 'regeneration' i.e. felling foes ahead. Wouldn't it improve the site's value to try the light management which the Plan itself raises in Appendix 4 of important valuation criteria – 'naturalness, where in fairly inaccessible ground a light touch has been the norm. It might make the canopy more diverse in age to allow some trees to stand longer whilst still at their maximum commercial value if felled!</p> <p>Many species prefer undisturbed environments. It takes decades for a species to form a stronghold and habitats to thrive. The disturbance and pollution caused by one JCB through an established habitat can destroy it in seconds (see P.S.).</p> <p>The Plan identifies the need to keep bird numbers high. It states that a dense, mature, broadleaf canopy is needed, so would it not be a more sensible strategy to leave those areas which take decades to [produce though conditions and qualities well alone. The fact is, natural regeneration takes much longer than the Forestry Commission and brief human lifespans want it to. It takes time for mature trees to give way to saplings. The 'Keepers of Time' policy writers need to recalibrate for a SSSI.</p> <p>The Plan also identified that more felling needs to take place because a path from the top car park is too muddy! It needs widening by at least a tree's width either side of the existing path and will eat into the part of the wood not identified as in unfavourable recovery! Surely if visitors come to woods they sometimes expect and can cope with a little mud or is the real reason for felling here to clear the way for the good old JCB!</p> <p>The Plan has a fifty year vision on pg 7 and sets out targets which are impossible for a SSSI to deliver. It states that trees will be valued ecologically, socially, for timber product, water regulation and carbon sequestration. That's an awful lot to ask. For all these attributes mature and veteran trees 'perform' better than their younger, smaller, or coniferous counterparts to keep the stock of trees in a state of constant rejuvenation is to lose efficiency for water regulation and carbon sequestration: but of course if they are not felled they may have realised their timber value...</p> <p>Throughout this Plan emphasis is on broadleaf regeneration and an insistence that PAWS will be restored to native species and yet the projection shows only a minor increase in broadleaf areas across all of the woodlands to just over 50% pg 28/29. Indicative future species diagram 2028+2047 actually shows a reduction in the SSSI of deciduous dominated areas and 4 areas of evergreen conifers added (Have the diagrams been mixed up?) It states that the fifty year Plan is bold. It is certainly bold enough to claim broadleaf regeneration yet 'deliver' conifers!!! But if we're not all dead by 2028 we all will by 2047!</p> <p>The confusing and ambiguous nature of the Plan thoughtful, positive prescription (pg17-79 – does not quite add up with recent past actions (see P.S.) or the sweeping unfavourable states and diagrams made about the SSSI elsewhere.</p> <p>Felling plans all indicate a restock of 100% Native broadleaf (natural regeneration) which implies that the exposure of woodland floor is the desired outcome! I have been walking Stoke Woods since the 'Keepers of Time' Policy came in in 2005 and have seen the swathes of bluebells just beneath the top meadows disappear under a tangle of brambles topped by fallen leaves. Felling was undertaken without any underplanting here and now the slope of blue bells is bramble scrub. Is this preparation for the deciduous conifer plantation already muted in the plan but not yet given the go ahead?</p> <p>Felling plans also indicate broadleaf regeneration at every opportunity (pg 126) with PAWS site reverted to broadleaf) yet rogue conifer will now wait another two years at least to be removed at the next thinning:</p>	<p>The vision makes a commitment that <i>Veteran, mature and future significant trees will be retained and allowed to breakdown providing deadwood habitat and nutrient cycling.</i></p> <p>Comment addressed on page 49 <i>Stoke Woods is in part a westerly-distributed assemblage usually associated with high sessile oak forest and sparse under-storey. Pied flycatchers, tree pipits and wood warblers depend on holes in mature oak trees or mature, well spaced oak woodland with little shrub layer and a low herbaceous layer and the mixed high forest at the west of the site provides more suitable conditions for this range of species.</i></p> <p>Comment disputed. It is widely recognised that actively managed woodlands deliver a wider variety and greater efficiency of ecosystem services than those which are unmanaged.</p> <p>Maps are correct and show a transition towards native cover. Gradual restoration is broadly recognised as the most ecologically sustainable and resilient form of ancient woodland restoration. This form of restoration has already begun and continued restoration is going to take a considerable amount of time and resource because of the limited native remnants from which sites can regenerate.</p> <p>Whilst a 11% increase may seem modest this equates to 26 hectares of restored woodland by 2048.</p> <p>Significant replanting with native species with a different seed source and provenance is not endorsed within SSSI's in order to protect distinct features unless the SSSI is declining. Therefore as stated on page 35 Minimal replanting should be required given the sites propensity to naturally regenerate oak and hazel. Consider enriching in clusters with Pedunculate oak, elm, cherry and wild service.</p>

Consultee Name	Consultee Comment	FC Response
Member of the Public No. 4 cont.	<p>Twice six and seven years ago I witnessed a Forestry Commission work park his van out on the road. I wondered why he hadn't just driven the tracks to his place of work. I didn't take the number plate on either occasion as I had no idea what he was doing. It was before 7am and gloomy. My dogs tracked him on both occasions and found him doing the same thing each time. He was wearing a large rectangular back pack and at the time I thought he was collecting soil samples. On one occasion he was at the foot of one of the mature oaks which stand on the incline below the disused car park. Although it may be jumping to conclusions, I don't think it is too far off the mark to suggest that the conifers which now sprout rather incongruously from the base of all those trees are all the same age and were planted purpose to make the slope less bare when the mature oaks are felled to 'regenerate' the area. Hopefully this is an incorrect assumption, but as this increase seems to be of great interest to those felling (see P.S.) I think I can be forgiven for this.</p> <p>P.S.</p> <p>Over the years I have seen many things in Stoke Woods – some make your hair curl!!! And others which contradict objectives and aims written in the Plan here and which contravene SSSI guidance. Some of these things might affect the site in future years:</p> <ul style="list-style-type: none">- ***NAME REDACTED*** dumped tonnes of black road silt/waste into the SSSI. It took the Forestry Commission 9 MONTHS to remove it. Far from being a 'clean removal' much of it, by that time had slid down the hillside further into the SSSI. It was then spread around like margarine, leaving bits of rubbish stuck to the forest floor to be washed further still downhill.- On two occasions in the month before the very effective fence was erected, two loads of fly tipping waste were buried by the Forestry Commission workers sent to remove it. One incident contained large items, including a sofa, whilst the other contained a range of smaller items; a scooter as a child's toy box – enough to block a path. Both lots still remain buried in the SSSI just behind the fence.-The Highways pipe plumbed directly into the SSSI from the road outside the paintballers' entrance. The road was closed for a number of weeks and road markings indicated that the drainage pipe was going to be dug out of the road down to the junction at the bottom of the hill. This never happened. The works took only just over a week but the road remained closed. Instead an ugly 6" pipe sticks out in midair into the SSSI from a double drain carrying water etc. from the paintballers access and the road uphill to Exeter. Already there is an accumulation of road grit and residue on the site.-The Forestry Commission wood stacks, which are constantly replenished often have larger hardwood trunks piled up. In the Management Plan fallen trees are supposed to be left to encourage flora and fauna (pg 30). Within the last few months a line of pollarded beech came down 50m uphill from the wood stacks and a few metres downhill from where the chap with the back pack planted his conifers. Days later, the whole tree was seen felled leaving a gaping site and next to it a perfectly healthy 20 year old oak was felled too. This wood is gradually being moved, the stack bit by bit as has happened before.-Finally, most recently whilst bulldozing access to the plantation of conifer at the Stoke Canon end of the wood a bank of violets, wood anemone etc. were destroyed. All areas in this lower area I have recently seen sloe worms, voles, newts, scorpions etc. I suppose this sounds rather precious, but if a SSSI isn't precious then what is?	<p>Our staff conduct annual tree safety checks on trees which are in close proximity to public access points. This is to ensure decaying limbs and trunks do not pose a risk.</p> <p>The accusation of unlawful behaviour is unwarranted—next time go and ask our staff what we are doing we are more than happy to explain.</p> <p>It is disappointing that the author has witnessed unlawful behaviour and has not informed the Forestry Commission before this time. The FC strongly recommend that anyone witnessing fly-tipping report it to the police so we can do our part in keeping the countryside clean</p> <p>Comment disputed: The accusation of unlawful behaviour is unwarranted. The FC have not buried waste, to do so would be legally and morally indefensible. If you have evidence please supply</p> <p>This is not something the FC have any control over. We recommend you bring this to the attention of the Highways Authority.</p> <p>The tree was felled due to tree safety concerns. We clear some trees to open the forest floor to the natural regeneration. Timber stacks do not contravene SSSI guidance.</p> <p>This operation had the full consent of NE and is required to facilitate the removal of the conifer. The work that this allows will create much greater opportunities for the species listed (except scorpions)</p>