

Forestry England Proposals for deforestation in the New Forest Inclosures

Application for Consent under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999

Background and Statement of Reasons Supporting Decision to Grant Consent

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New Forest Inclosures
Application for Consent under EIA (Forestry) (England and Wales) Regulations 1999

Glossary

Term/Acronym	Definition
FC	Forestry Commission is the Government Department responsible for woodlands in England.
FS	Forest Services. The regulatory part of the FC
FE	Forestry England. Responsible for managing the public forest estate.
EIA	Environmental Impact Assessment
Determination	The decision FC ultimately makes, as the Competent Authority, on whether to give consent for a relevant project under the EIA regulations.
Opinion	The process whereby FC, as the Competent Authority, gives their opinion as to whether a project is a relevant project under the EIA regulations and whether it will require our consent.
Screening	A process used to help determine if a project will have a significant effect
Scoping	Takes place once a decision has been made that the proposals are likely to have a significant effect on the environment and hence will require our consent. It determines the focus of the Environmental Statement that must be prepared by the applicant, which in turn informs Forestry Commission (Forest Services) decision of whether to grant consent or not.
ES	Environmental Statement
OSA	Operational Site Assessment
EPS	European Protected Species
SSSI	Site of Special Scientific Interest
SAC	Special Area of Conservation
SPA	Special Protection Area
ASNW	Ancient–Semi Natural Woodland – land that has been woodland since ~1600.

Purpose

1. To explain the Forestry Commission (Forest Services) decision to consent this application subject to the conditions described below to avoid, reduce and offset the major adverse effects of deforestation.

Site and ownership

2. The New Forest Inclosures form part of the Crown Lands of the New Forest and are located in Hampshire to the West of the Solent on the Hampshire/Dorset border.

Legislative Background

3. The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999¹ ("the EIA (Forestry) Regulations") prohibits the carrying out of any work or operations in relation to a "relevant project" unless consent has been obtained from the Forestry Commission (Forest Services) or, on appeal, the appropriate Authority (in England, the Secretary of State for Environment, Food and Rural Affairs).
4. Regulation 3 defines a "relevant project" as one of four types of forestry activity:
 - Afforestation;
 - Deforestation;
 - Forest road works;
 - Forest quarry works

which does not constitute development regulated by the EIA legislation on town and country planning but which, by virtue of its nature, size or location, is likely to have significant effects on the environment.

Application Details - Environmental Statement

5. The Forestry Commission (Forest Services) received a New Forest Inclosures Forest Design plan for approval in April 2017, which at that time included 464 hectares of woodland for deforestation. The deforestation proposals were screened in June/July 2017 and in December 2017 Forestry Commission (Forest Services) informed Forestry England that they would need consent. Since December 2017 Forestry England has revised their proposals reducing the area of deforestation to be considered by this Environmental Statement to **290 hectares** (see paragraph 33).
6. The scope of the Environmental Statement (ES) was agreed in April 2018 after a scoping meeting in January 2018 involving a wide range of invited stakeholders.
7. A draft ES describing the project's likely environmental impact and proposed mitigation was submitted to the Forestry Commission (Forest Services) on 24th April 2018. Following feedback to Forestry England an application for EIA (Forestry) Consent with an accompanying ES was submitted to the Forestry Commission (Forest Services) on the 10th July 2018.

<http://legislation.data.gov.uk/uksi/1999/2228/made/data.htm?wrap=true>

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New Forest Inclosures- Application for EIA Consent: Key Dates

Date	Stage in EIA Process	Relevant Section of EIA (Forestry) (England and Wales) Regulations 1999 (Statutory Instrument 1999 No. 2228)
April 2017	Draft design plan received.	Regulation 5
15/6/2017	Screening exercise started.	
20/12/2017	FC informed FE that consent is needed.	Regulation 6
16/1/2018	Scoping meetings held	
23/3/2018	Early Draft ES received by FC	
24/4/2018	Full Draft ES received by FC	
26/4/2018	Scoping report agreed	
10/5/2018	FC comments on full draft sent by to FE	
20/6/2018	Revised draft ES received by FC	
01/7/2018	Further FC advice on drafts sent to FE	
10/7/2018	Final ES submitted to FC	Regulation 10
26/7/2018	ES advertised, sent to consultees and stakeholders.	Regulation 13
February 2018	Determination	Regulation 15
June 2019	Notification of decision	Regulation 16

National and Local Policy Context Relating to New Forest Inclosures

8. National and regional policy documents provide a general context for considering applications under EIA (Forestry) Regulations. They help to inform the decision by setting down the contemporary standards that should be applied when determining whether or not an environmental impact is likely to be significant.
9. The Government's approach to sustainable forestry is underpinned by the **UK Forestry Standard** (4th edition²). The Standard, supported by its series of guidelines, outlines the context for forestry in the UK, setting out the approach of the UK government to sustainable forest management, defining standards and requirements, and the basis for regulation and monitoring.
10. Biodiversity 2020, a national strategy for England's wildlife and ecosystem services, highlights goals for more, bigger and less fragmented areas for wildlife – an increase in priority habitats.
11. The New Forest is located in the New Forest National Park which lies mainly in Hampshire, with parts in Dorset and Wiltshire.

Summary of Consultation Process

12. The application for EIA (Forestry) Consent with supporting documents including the Environmental Statement, were subject to a 28-day public consultation starting July 26th 2018. Notices were published in the Daily Echo and the Lymington Times. These notices advised that the Environmental Statement and associated documents could be viewed by members of the public at Queens House, Lyndhurst and at The New Forest National Park Authority/New Forest District Council Offices, Lymington Town Hall and on the internet at <https://consult.forestryengland.uk/forest-districts/6f89fcb4/>. Stakeholders were notified via email, a letter was sent to formal consultees and local groups, representative bodies, Parish Councils were made aware of the consultation, but no direct contact was made with local residents.
13. The notices stated that anyone who wished to make representations should write to the Forestry Commission (Forest Services) within 28 days. As the consultation ran over the summer holidays it was subsequently extended until the end of September in response to requests to do so.
14. The FC sent letters to Natural England, Environment Agency, Historic England and New Forest National Park Authority informing them of the consultation and requesting written responses to be sent to the Forestry Commission (Forest Services) SE & London Area office by 24th August 2018. This was subsequently extended until 30th September 2018.
15. A total of 39 responses were received highlighting 167 specific, but in many cases, similar issues. Each response was analysed and considered in detail.
16. Issues raised by consultees are summarised in [Table 1](#).

Issues Raised by Consultees

17. Some objections to the proposal failed to explain their concerns about the impact that it would have.
18. Other responses raised issues about the forest design plan rather than the deforestation proposals presented in this application for consent.

² <https://www.forestry.gov.uk/ukfs>

19. There were a number of specific responses about Norley Inclosure.
20. The main areas of concern were about:
 - the long term impact that losing conifer woodland might have on local businesses and traditional employment,
 - the loss of areas of ancient woodland,
 - potential increases in noise and air pollution,
 - potential impacts from deforestation on hydrology and climate.
21. The proposals were commended for their ambition to apply a more natural forest management regime as it would bring benefits to habitats and species that use open habitats and fulfil the Minister's Mandate to prioritise nature conservation.
22. A number of submissions criticised the lack of operational detail in the ES.

Basis of the EIA Determination

23. The EIA determination process provides a framework for assessing and evaluating the positive and negative impacts that the project will have on the environment. The decision on whether or not to grant consent takes account of the predicted environmental impacts and analyses the evidence presented, representations received and other material considerations. Particular attention is paid to the direct and indirect effects of the project on the environmental factors listed in Schedule 4 of the EIA (Forestry) Regulations.
24. In evaluating the effects of the proposed deforestation a number of criteria have been applied including:
 - The degree of change in environmental conditions;
 - The scale, extent and duration of the project;
 - The number of people and other receptors affected;
 - The value and scarcity of the resources affected;
 - Whether the proposal results in any breach of environmental standards;
 - Whether any protected sites or features are affected;
 - The probability of the effect occurring;
 - Whether the effect is permanent or temporary, reversible or irreversible, continuous or intermittent; and
 - Whether it will be feasible to avoid, reduce, remedy or compensate for any negative effects.
25. The following paragraphs outline:
 - The main reasons and considerations on which the decision is based;
 - A description, where necessary, of the main measures to avoid, reduce and, if possible, offset the major adverse effects of the project; and
 - The conditions which are attached to the approval.
26. In reaching its decision the Forestry Commission (Forest Services) can include conditions to strengthen proposals and ensure greater certainty in achieving desired outcomes, in addition to the conditions to be included in every consent that are set out in the regulations.

Assessment – the main issues considered in determination of the project

27. Schedule 4 of the EIA (Forestry) Regulations 1999 requires the competent authority (in the case of afforestation, deforestation, forest roads or forest quarries this is the Forestry Commission (Forest Services)) to consider the impacts of the proposals on:

- i) Flora and fauna;
- ii) Soil, water;
- iii) People, access and recreation;
- iv) Archaeology and heritage;
- v) Landscape;
- vi) Climate; and
- vii) The interaction between the factors mentioned above.

The issues are described in more detail in the following sections.

People Access and Recreation

28. Many concerns were raised about the long term loss in conifer woodland area and the risks that this might place on the viability of local “woodland related” businesses and jobs. The scope of this ES is limited to proposals for deforestation over the next 10 years. The Forestry Commission (Forest Services) review ascertained that Forestry England have profiled a continuous production of conifer timber from deforestation sites in each of the next 10 years. Such production is finite and could continue if the same approach is applied in each subsequent 10 year period until all conifers are removed from the New Forest. Consequently the change in available conifer volumes will take decades to be felt and businesses would have time to diversify and seek alternative timber sources within the wider area, or seek alternative activities to retain jobs and livelihoods. There would be a minor effect on some people working on forestry activities. Efforts to mitigate any loss of “forest dependent” jobs and livelihoods should be explored in partnership with the New Forest NPA and Forestry Commission (Forest Services) as part of developing the joint 2019 FC/NPA Accord for the New Forest.
29. Proposals for Norley Inclosure generated considerable local interest. Local residents wished to be fully engaged in the decision making process to ensure that their interests were fully taken into account as they felt this has not always been the case. Although the local Parish were notified of the plans and the Norleywood Society made a response to the consultation, residents remain concerned that their freedom to enjoy the woodland is at risk. The scale of planned works is small (approximately 1.5ha) extending an already open area. Further engagement should be undertaken at the local level before any work starts on the ground.
30. The risk and severity of wildfire is greater on open habitats than within woodland. The Forestry England New Forest team have considerable experience in managing and planning for wildfires. Any likely increased fire risk generated by the proposed deforestation should be shared with the local fire and rescue service wildfire expert at the appropriate time.

Flora and Fauna

31. Natural England, the statutory body responsible for the condition of designated sites such as SSSIs and SACs, felt there were no negative impacts on the features and species for which the sites are designated, and that the work will have positive impacts. The Operational Site Assessment was seen as a suitable mechanism for ensuring that any site specific issues were addressed with Natural England.

32. Significant parts of the woodland included in the application (89 ha) were found to be ancient woodland sites. Discussions with the applicant revealed that these areas are to be converted to grazed broadleaved woodland. Consequently these areas are not being 'deforested' and do not fall under the auspices of the EIA Regulations. In addition, 80 ha had already been felled under the previous plan and 5ha have been removed from the application. The net area of deforestation for conversion to open habitats is 290 ha.' Full details can be found on the interactive maps which can be found at <https://www.forestryengland.uk/info/about-your-forest-32>
33. It has been suggested that with an increase in the proportion of Forest Inclosures being moved to 'open habitat' future plans should integrate these areas with that of the surrounding Open Forest. Such an approach would support the Lawton Report principles for wildlife and ecological networks to be bigger, better and more joined up and enable a more holistic approach to managing the New Forest. The report is available at <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>. A condition specifies that Forestry England will give consideration to how this might be achieved and how it reflects recovery of favourable condition whilst still honouring requirements of the New Forest Acts.
34. Deforestation reduces the available habitat for species whose preference is conifer woodland e.g. crossbills, firecrests and siskin. The ES describes both the woodland and open habitat specialists recorded within the Inclosures. The open habitat specialists are qualifying species of the SAC, SPA or SSSI whereas the woodland specialists are not, although some are listed as birds of conservation concern. Under this plan, available conifer woodland habitat in the Inclosures will reduce by 7.6% with a corresponding increase in open habitat. The changes will benefit the species for which the area is designated with relatively minor impact on species which are supported by conifer woodland.
35. Deer and their welfare were raised during scoping. Deer populations are generally high, exerting some influence over the intensity of grazing on the forest. Deer will generally seek shelter in conifer woodland and browse adjacent open habitats. Proposals are likely to favour habitats for deer, exerting a nominal impact.
36. Fences are an important tool in open habitat management as they help manage the intensity of grazing and by consequence the speed of change in vegetation recovery. Concerns were raised during consultation about their impact on habitat restoration. The ES proposes that changes to fencing, (their installation or removal), are agreed with stakeholders in advance. As such, there is a condition that any changes to boundaries on internal Inclosure fences are agreed as part of an enhanced Operational Site Assessment (eOSA) process.
37. There was a suggestion that fencing should be subject to a Habitat Regulations Assessment (HRA). Forestry England is a competent authority in this respect and any HRA and the need for an Appropriate Assessment would be carried out by Forestry England. This is outside the scope of the ES.
38. A number of consultees were interested to understand how restoration of habitats would be achieved after areas had been deforested. Although the ES describes a number of restoration techniques these are neither assessed nor explained in detail, nor is it made clear how different options will be considered for different sites during the Operational Site Assessment (OSA) process. There were concerns that soils would be more exposed to damage following lop and top removal. The assessment of impacts at 4.4 in the ES addresses fences and infrastructure such as drains but fails to consider the impact of site restoration methods. There needs to be a more detailed description of restoration methods including risks and benefits with a decision matrix to guide managers on the most suitable method to adopt under different scenarios.

39. Grazing is within scope of the ES as it forms part of the habitat restoration process and whilst mentioned in paragraph (4.1.1) the impact of grazing is not assessed. It is recognised that livestock numbers are not something that Forestry England can control on the Open Forest but there would be value in assessing how livestock are managed within the Inclosures to optimise the desired habitat restoration sought by this project.

Soils and Water

40. Hydrological impacts are assessed in section 5.3 of the ES. There is no flood risk assessment or consideration of wider downstream catchment impacts arising from deforestation and habitat change. Further analysis/monitoring of deforestation on potential flood risk and downstream catchment impacts must be considered prior to work starting and should be reflected in the enhanced OSA process.
41. Water quality is a relevant issue. The ES presents an Environment Agency Water Framework Directive assessment of water courses near areas included within this project and can be used as a baseline for future monitoring during and after deforestation. Fish stocks in New Forest Rivers have been widely studied and water temperatures are already known to be high, loss of shade through deforestation has the potential to increase these temperatures further. Mitigation measures proposed in section 5.5 which state "liaison with EA" is inadequate and more detailed understanding of the risks and impacts of deforestation will be required prior to work starting on site.

Landscape

42. Deforestation is proposed within an intimate landscape of woodland and heath where openness often dominates. Although the total area of woodland removal is large it is dispersed across numerous blocks, many of which are quite small, and others extend already open areas on the edge of retained woodland. Overall it is felt that the impact is not significant. However, on some sites, adjacent to neighbours and local communities, where the scale of deforestation is locally more significant, there will be a need for further engagement with local users of the woodland prior to works commencing on site. The enhanced OSA process must consider this scenario with the possibility of moderating plans to ensure that habitat restoration is achieved with local support.
43. The ES considered 2 sites in more detail where the level of deforestation was at a larger scale. At these sites the visual impact on landscape character was not found to be significant.

Archaeology

44. The ES notes that there are significant numbers of known archaeological features on the sites considered in this proposal. Despite there being extensive LIDAR surveys of archaeological features and a close working relationship with the National Park Authority the ES fails to explain how the risks of damage to archaeology will be either assessed or addressed other than to seek advice from the archaeological contractor. The statutory consultee Historic England felt there was insufficient information to allow them to make a judgement of impact. The enhanced OSA process needs to describe a methodology to protect and avoid features and how they will be mapped in order to guide operations on the ground.
45. Conifers were identified by consultees as part of the silvicultural heritage of the area and there were concerns about the removal of all conifers from the Inclosures. This proposal does not in itself remove all conifers and so it is felt that the impact is not significant.

Climate

46. The calculations in this section under-estimate carbon changes, they do not follow FC guidance and fail to consider the impact of subsequent restoration and management activities. The impacts are considered to be moderately significant. There is therefore a requirement to provide and agree a matrix which will determine the most suitable restoration method that minimises negative impacts on climate. Although planting new woodland elsewhere could mitigate the loss of carbon sequestration arising from deforestation there is no requirement for this under the Open Habitats Policy on designated sites. A condition has been included that requires an assessment of opportunities for creating new woodland, but stops short of requiring the creation of new woodland.
47. Air quality is simplistically addressed without considering pollution from particulate emissions should any “burning up” occur on areas that have been deforested. There are localised concerns about air quality as well as noise and light pollution. Whilst not significant, neighbours and local users of sites should be engaged during the enhanced OSA process to allay any concerns.

Managing Unforeseen Risks and Uncertainty

48. The enhanced Operational Site Assessment (eOSA) process is designed to pick up potential impacts of proposals that are not included within the ES, due to their unforeseeable nature, or the detailed needs across each individual site. It is important that this process is updated to consider the potentially un-intended negative consequences of proposals that are difficult to accurately predict now but may emerge in future.

Summary and Conclusions

49. The information contained in the ES has been studied in detail, consultee responses have been reviewed and expert advice sought to verify the evidence presented. Whilst the ES lacks detail in a number of areas, the objectives of the proposals are to improve the habitats for which the New Forest is designated. Any lack in detail within the ES has been highlighted within the conditions set out below. Where appropriate the condition states that no works can begin until that detail is received and its impact and any necessary adjustments to proposals agreed with FS. The following conditions are set out with the purpose of supporting this intention, ensuring that works are compliant with the UKFS and that environmental benefits are optimised.

Forestry Commission Decision

50. Having considered the Environmental Statement, national and regional policy contexts, advice received from statutory and other bodies, the views of consultees and the appropriate decision making framework set out within the regulations, the Forestry Commission (Forest Services) has approved the application for consent, subject to the conditions below.

Conditions of Consent

51. **Condition (a):** The proposals hereby permitted shall be commenced before the expiration of two years from the date of this permission.

Reason: To ensure that the deforestation is commenced within a reasonable period of time from the date of the permission.

52. **Condition (b):** No work shall be carried out in relation to the relevant project after the expiration of ten years from the date of this permission.

Reason: To ensure that the project is completed within a reasonable time period from the date of approval.

53. **Condition (c):** This consent relates to deforestation proposals included in the New Forest Inclosures Forest Design Plan, outlined in the supporting Environmental Statement **and** the amended maps (produced at the request of Forestry Commission (Forest Services) during the scoping and consent phase of the EIA process) where areas of ancient woodland have been removed. Any further variance to proposals for deforestation must be approved with the Forestry Commission (Forest Services) in advance and in writing. (Note: this decision relates only to the areas proposed for deforestation within the New Forest Enclosures Forest Design Plan).

Reason: To ensure the deforestation is compliant with forestry legislation.

54. **Condition (d):** Implementation of proposals at Norley Inclosure subsequent to this decision will be preceded by engagement with local representatives to explain the planned work. This engagement must be commenced a reasonable and proportionate time prior to works commencing.

Reason: Despite considerable effort to engage local residents in developing the ES, some remain nervous that proposals might risk their freedom to enjoy the wood. Failure to alleviate concerns and fully explain proposals prior to works starting on site could undermine local relationships and lead to unnecessary delays in project implementation.

55. **Condition (e):** An integrated management plan for the whole Forest (Inclosures and Open Forest) will be developed and completed within 5 years of this approval and will be based on the Special Area of Conservation plan. The scope of the plan will be agreed within 12 months of this decision.

Reason: There is concern that open habitats created from Inclosure land will be managed in isolation from the Open Forest. A shift to whole forest planning (Inclosures and Open Forest combined) could resolve this but might be complex and challenging.

56. **Condition (f):** Fence changes, additions/removals (and possible use of seasonal grazing), should be assessed at the enhanced OSA stage and agreed by a panel to include Forestry England, Natural England and the Verderers. This panel will determine the appropriate location and timing of fence changes to benefit habitat restoration and continued management of stock.

Reason: Changes in fencing influence the effectiveness of grazing, and have the potential to influence other factors of interest to various user groups. Changes will need stakeholder support.

57. **Condition (g):** A decision matrix will be prepared to determine the appropriate methodology to use for habitat restoration. This matrix should be agreed with specialists in soils, water, climate and ecology from Forestry Commission and Natural England and should be included within the enhanced OSA process prior to work starting on site.

Reason: The method used can have significant impact on many environmental factors that were not adequately described within the ES. Independent advice will help confirm the appropriate approach to be taken on each site.

58. **Condition (h):** The detailed process of converting woodland to the desired open habitat will be planned in detail at the enhanced OSA stage. Progression with this conversion will be monitored

annually to both identify remedial action needed to ensure the site achieves the desired open habitat within 15 years and to gather experience which can be applied elsewhere.

Reason: Grazing is an important habitat management tool. The ES lacks detail in how the intensity and timing of grazing might influence the speed and quality of habitat recovery. Monitoring habitat recovery in a range of situations would inform managers about preferred timing and intensity of grazing for optimum recovery.

59. **Condition (i):** The OSA process will be 'enhanced' to assess the appropriate level and method of engagement with local residents and forest users when deforestation is proposed close to local communities and neighbouring properties. The methods considered will include on site notices, guided walks and use of social media. Details of felling plans for discrete areas will be posted (where appropriate with further details on the Forestry England New Forest website). Where local interest is known to be strong a guided walk will be provided for interested parties, neighbours and local residents. Interested parties will be invited to suggest refinements to the design within 4 weeks of the notices being first displayed (appreciating that the principle of deforestation of these areas is accepted). Details of the final design explaining how local feedback has been responded to will be posted on the Forestry England New Forest website within one month.

Reason: To include every neighbour within the consultation for an ES is complex, time-consuming and unrealistic, and householders can change before work starts. Discussion with people affected by proposals is a requirement of the UKFS and will generally improve local relationships and win support for project implementation.

60. **Condition (j):** Continue to seek expert advice on wildfire risk mitigation from the local Fire and Rescue Service expert when fire plans are reviewed annually to incorporate new areas of open habitat and reflect current best practice.

Reason: Wildfire risks can increase with the creation of open habitats. Continued regular liaison will ensure plans and fire risk mitigation proposals remain appropriate, current and relevant.

61. **Condition (k):** Forestry England will within 12 months of this decision identify possible options and opportunities for planting new woodland to compensate for the carbon impacts of this project.

Reason: Some of the project's drawbacks centre around its negative impact on carbon sequestration. As the New Forest Inclosures are designated (SSSI, SAC, etc.) there is no requirement for compensatory planting under the Open Habitats policy. However this ES doesn't consider mitigation for any negative impact on carbon sequestration.

62. **Condition (l):** Forestry England will explore opportunities to establish other "forest dependent" jobs under the new FC/New Forest NPA Accord which is to be launched later in 2019.

Reason: Some of the project's drawbacks centre around its negative impact on business. However this ES doesn't consider mitigation for any negative impact on business.

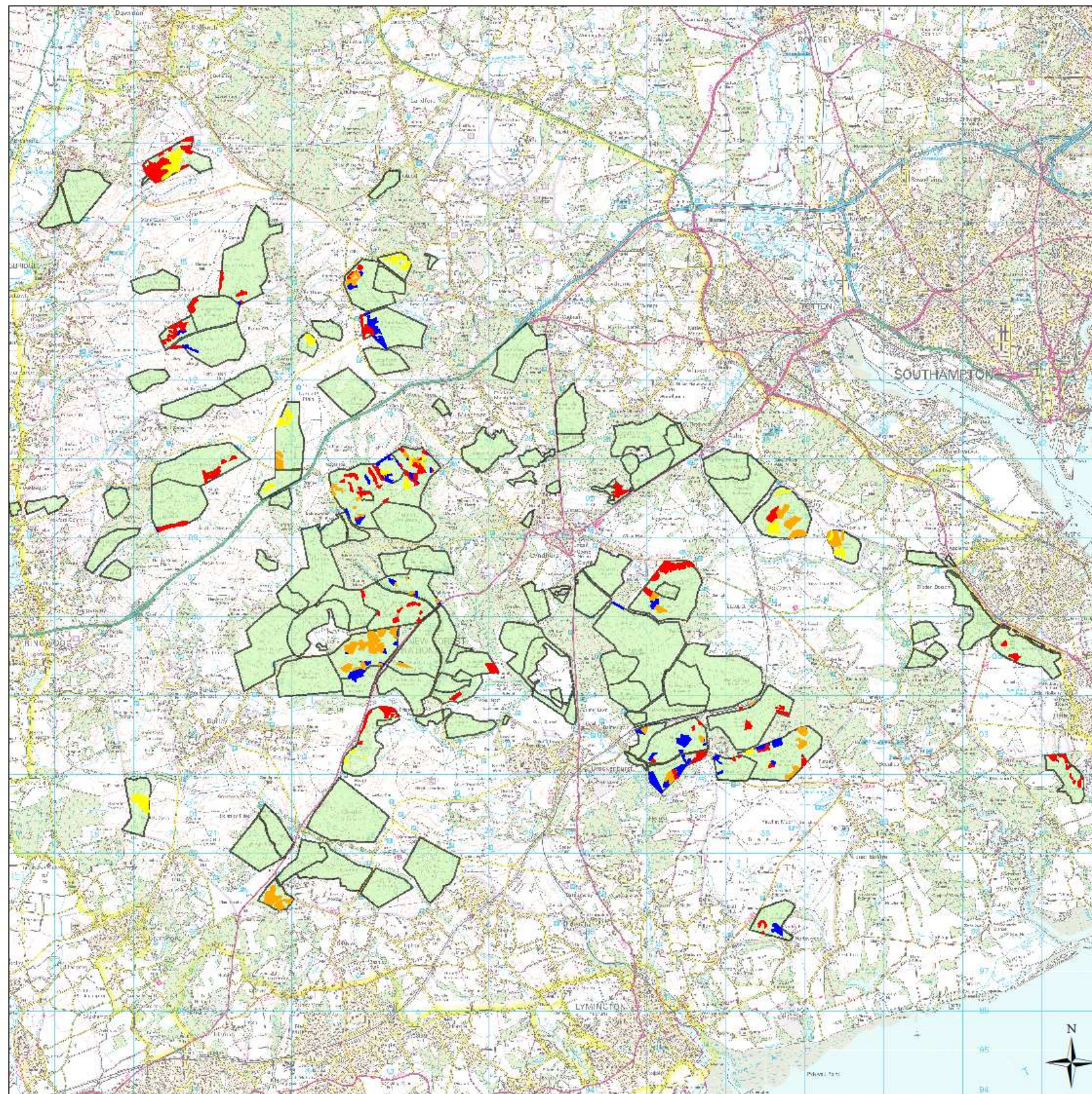
63. **Condition (m):** Forestry England should engage the Environment Agency and Forest Research's hydrologist to evaluate the potential impacts of deforestation on the forest's hydrology and develop appropriate mitigation where needed. This mitigation should be included in the decision matrix described in condition (g). The enhanced OSA process should include evaluation of the hydrological impacts of each site and identify appropriate mitigation using the principles identified in the matrix. No works on individual sites may begin until the enhanced OSA which includes impacts on hydrology is agreed with Forestry Commission (Forest Services).

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Reason: The impact of proposals on water quality and flood risk is not well understood. Assessment in the ES lacks the detail needed to determine potential impacts. It is important that this work is undertaken and agreed prior to work starting on site.

64. **Condition (n):** Forestry England will prepare and implement an enhanced Operational Site Assessment (eOSA) process for each discrete deforestation site. This will identify the approach to delivering the desired open habitat, ensure that potentially negative environmental impacts from proposals are identified and appropriate remedial action agreed prior to work commencing. This enhanced OSA template needs to be agreed with Forestry Commission (Forest Services) within 6 months of approval of this decision. No work on deforestation sites will proceed without an eOSA having been completed.

Reason: Throughout the ES, the Operational Site Assessment (OSA) is cited as identifying mitigating action to ensure environmental compliance (i.e. for conditions f, g, h, i and k). The mitigating action needs to be clearly defined for each discrete area of deforestation.



**New Forest Inclosures
Forest Plan**



Open Habitat Restoration Summary

Illustrates planned felling coupes within the FP period, symbolised by type and timing of restoration.

Legend

Restoration to Open Habitat

- Felling Period 2019-2024
- Felling Period 2025-2029

- Areas Felled under Previous FP
- Conifer to be Removed on AW Sites between 2019-29
- Inclosure Boundaries

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@ A2

Date: 15/03/2019

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Ordnance Survey [100021242]



Table 1 Issues Table

Response	Issue Number	Organisation	Objection/Opinion Specific Issue	FC Response	Condition
1	1	Individual	General objection to Norley Wood proposal	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (j) formalises the need to consider neighbours
2	2	NF Access Forum	General support		
3	3	Woodland Trust	Some areas of deforestation on areas mapped as ancient.	This needs to be checked and ancient woodland removed from any plans to deforest	Removed from proposal or clarified as grazed BL woodland
	4		Concern about permanent open habitat where wood pasture may be more appropriate.	Determine where these areas are and what benefits there may be over open heath	Removed from proposal or clarified as grazed BL woodland
	5		Concern that Unit condition requirements is driving tree removal and constrains opportunities to take a landscape approach.	This is likely to be something to look at a National level as it is likely to be true for many areas	Condition (e)
	6		Concern about areas of PAWS being defined for open heath	As for Issue 3 these should be removed from the deforestation plans	Removed from proposal or clarified as grazed BL woodland
	7		Retain some oak and beech to provide continuity and succession for bryophytes, lichens etc. which are internationally significant.	Seems appropriate, substantial areas of suitable woodland and individual trees being retained	
4	8	UKFPA	Negative impact on economic and social benefits	Timber outturn isn't impacted at the District level during the period of the project	
	9		Impact beyond local area and loss of income impacts sustainable management of forest and range of benefits	FE manage their business at a National level so negative impacts are accommodated	
	10		Not all aspects of scenarios considered and under-plays downsides of chosen option such as carbon sequestration. Not convinced chosen option is the only one with a positive outcome.		Condition (k)
	11		DNB not a justification for heathland. Alternative spp an option.	Relates to FDP	

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	12		Deforesting an historic forest in a time of Government tree champion and 2009 consultation saying woodland removal a last resort because of impact on carbon, economy. Not to consider compensatory planting is dereliction of duty by FC	Suggest an analysis of options to plant new woodland.	Condition (k)
	13		Ministers Mandate places high priority on retaining character, sustainable forest management and efficient management and appropriate generation of income.	Conservation of the natural and cultural heritage is the primary objective with community engagement and public understanding as a second, with timber production and income only where it is compatible with the other 2 objectives.	
5	14	Confor member	Result in shortfall of conifer timber. Conifers play a role in improving and enhancing public access	Timber outturn isn't impacted at the District level during the period of the project	
6	15	Individual	Concerned about fencing and not being aware of plans until informed by Verderers		Condition (f)
7	16	Boldre Parish Council	Voices concerns of residents near Norley Inclosure. Concerned at loss of landscape, habitat and increase in noise from road. Want local consultation prior to further works	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
8	17	Brockenhurst PC	28 day consultation not sufficient because of timing	Consultation was extended	
	18		Are opposed to wide scale conifer removal. Timber production part of cultural heritage for centuries.	Conservation of the natural and cultural heritage is the primary objective with community engagement and public understanding as a second, with timber production and income only where it is compatible with the other 2 objectives. Conifers conflict with natural heritage	
	19		Plan refers to replacing conifers with managed native woodland. There are examples now where this is birch and willow scrub. Short term cost saving with long term negative financial outcome.	This probably refers to FDP generally rather than EIA deforestation areas	

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	20		Verders Inclosures returned to heath may have merit. Mostly planted in 1960's and very poor (GYC 12 or less) but automatic eradication of conifer not in public interest.	Conversion from conifer is an FDP consideration	
	21		Initial call for views on FDP, 53% wanted a working productive forest on basis of cultural heritage, employment, biodiversity, economy and carbon. Only 17% supported the plan.	This is referring to the FDP	
	22		Irresponsible to meet SSSI target ignored for 50 years when we are 3rd highest importer of timber in world. Proposal is contrary to a duty to "seek to foster the economic and social wellbeing of local communities"	Meeting the SSSI target is being driven by NE and public bodies have a legal duty to work towards condition targets.	
9	23	Woodgreen PC member	Timing means a PC response is not possible	Consultation was extended for a month	
	24		Deprives residents of local amenity. Residents would wish for the Forest to remain as it is.		Condition (i)
10	25	Individual, Lymington area	Loss for NF and community	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
	26		Loss of wildlife		
	27		Huge effect on properties and community		
	28		No benefit for wildlife, community or residents or NF as a NP		
11	29	Norleywood resident	Objects plans to completely deforest local woods	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
	30		Local unaware and would want to participate in a sound local process.		
	31		Residents not considered and would like to see an appraisal of local engagement.	Parishes are included as are the NPA.	
	32		Disputes data about local deer populations and other native species.	No specifics	
	33		Small clumps of trees won't reduce impact of plan which will decimate area.		
	34		Disputes RA of noise and pollution		Condition (l)

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	35		Deforestation to assist grazing isn't right way forward and will destabilise environment	Grazing is to maintain habitat rather than deforesting to assist grazing	Condition (h)
	36		Incorrect conclusion based on flawed data. Slow and steady reversion to natural woodland best way forward without reducing woodland area. Current conclusion is an easy and cheap way out.	This is the approach in the design plan, but for the open habitats this wouldn't achieve the required outcome for designated sites	
	37		Requests full public consultation with all residents		
12	38	Individual	Destroying a place of national interest, wildlife will suffer	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
13	39	Individual	Concerned about visual impact and tranquillity	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
	40		Loss of habitat and noise and pollution filter		
	41		Inconsistencies between maps		
	42		2017 deforestation carried out without local consultation		
14	43	Norleywood and District Society	Requests consultation prior to work starting.	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
	44		Increased noise and air pollution		
			Visual impact		
			Loss of amenity		
	45		2017 experience of deforestation without warning was a shock		

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15	46	Individual	Lodges dispute to the proposal	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
16	47	FC Tom Nisbet	Lack of detail in some areas of ES	General observation	
	48		Scenario assessment very poor particularly statement about conversion to native woodland threatening soils and water bodies by nitrification.		
	49		Insufficient attention to impact of post deforestation methods of restoration and maint. Not sufficient to say decisions left to local factors.		Condition (g)
	50		Lack of consideration to longer term impact on soil structure and dynamics and ecosystem services		
	51		Wider issue of works designed to 'deprive soils of nutrients' will degrade rather than protect the soil		Condition (g)
	52		Hydrology assessment not in a catchment context will underestimate potential impact.		Condition (l)
	53		Errors in the calc of the impact of deforestation on evap. Failure to consider the impacts of significantly greater run-off than estimated.		Condition (n)
	54		Assumed equal conversion to heather, grass bracken needs more explanation including whether this would vary between catchments.		
	55		Failure to consider changes in water quantity on end users and environment. Flooding known to be an issue within and downstream of Forest.		Condition (l)
	56		Inadequate treatment of the impact of loss of shade on surface waters which are known to be less than good for fish and oxygen levels. Changes could be significant. Issue should not be described as low impact or that there would be liaison with EA. Clarity needed.		Condition (l)
	57		Impact of tree removal on stream hydro-morphology largely ignored.		Condition (l)
	58		Statement that deforestation potentially enhances water quality needs further consideration.		

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	59		EA data shows a number of water bodies failing good status for phosphate. Need to consider how works will affect phosphate input and how they will be managed.		Condition (l)
	60		No assessment of public and private water supplies and how proposal may impact them including in terms of water pathogens.		Condition (l)
	61		Impact on soil carbon largely ignored as are the effects of restoration methods.		Condition (k) and (g)
	62		Role of adjacent woodland in removing air pollution and downwind deposition is ignored. Local grazing changes and ammonia need addressing and whether NE has any site nitrogen plans.		Condition (k)
17	63	Confor	NF highly prized for economic and social benefits. Many livelihoods and businesses rely on raw materials.	Timber outturn isn't impacted at the District level during the period of the project	
	64		Income offsets costs of other public benefits	FE manage their business at a National level so negative impacts are accommodated	
	65		DNB not a justification for heathland. Alternative spp an option.	Relates to FDP	
	66		UK is 3rd largest timber importer. Must maintain forest footprint.. Offshoring is unsustainable and unacceptable.	Suggest an analysis of options to plant new woodland.	Condition (k)
	67		No requirement for compensatory planting	Policy doesn't require compensatory planting on designated sites.	
18	68	EA	Agree that proposal will have an overall positive impact.		
	69		No flood risk assessment of impact - point given more specific illustration. ES does not adequately address flood risk and needs to be updated and if impact is significant mitigation will be needed.		Condition (l)
19	70	NE	Supportive		
20	71	Verderers	Concern about impact on local economy	Timber outturn isn't impacted at the District level during the period of the project	
	72		Concern about fence line and costs		Condition (f)
	73		Funding of re-instatement of land an issue.	FE manage their business at a National level so negative impacts are accommodated	
21	74	RFS	Negative impact on the forest as a working forest.	Timber outturn isn't impacted at the District level during the period of the project	

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	75		Soils not suited to broadleaves in Verderers enclosures so conifer provides local sustainable resource.	Relates to FDP	
	76		Conifers have been in NF for a long time.	Relates to FDP	
	77		ES says priorities should be Nature people and economy.		
	78		Timber will need to be brought in of sawmills are to survive which produce more traffic.	Relates to longer term than covered by ES	
	79		Plan will exacerbate shortfall in UK softwoods	Relates to longer term than covered by ES	
	80		Well managed conifer are rich in biodiversity and can be more diverse than poorly managed BL's and plan acknowledges crossbill, firecrest, etc.	FDP related	
	81		Carbon, plan will reduce carbon sequestered.		Condition (k)
	82		Reject concept of resilience in the plan. Diversity is essential	Diversity of habitat in Inclosures is maintained during the project period.	
	83		Concern about consultation timescale	Consultation was extended for a month	
22	84	Individual	Recent work has destroyed landscape	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
	85		Stream now a muddy hole	Observation	
	86		Traffic noise		
	87		Enough open forest	Observation	
23	88	Tilhill	Deforestation at odds with policies relating to tree cover and resilience planning		
	89		Locally significant areas of conifer lost (240ha at Purbeck) 1280ha at NF since 1999 and suggest its an underestimate with NE under reporting.		
	90		Significant cost to rural employment. No replanting removes £570,000. Conservative estimate of crop rotation = £9,000,000	Timber outturn isn't impacted at the District level during the period of the project	
	91		Deforestation exacerbates skills shortage in forestry	The area under consideration is less than 5% of the Inclosures and unlikely to have a significant impact	

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92		Immediate loss to supply chain - tree nurseries, sporting, sawmilling	Timber outturn isn't impacted at the District level during the period of the project	
93		Loss of carbon sequestration and increased grazing adding more greenhouse gas		Condition (k)
94		Private application would be expected to provide compensatory planting	Policy doesn't require compensatory planting on designated sites. A private application would be considered in exactly the same way.	
95		FCE have only created 100ha of new woodland in last 10 years, all in 2008	Observation	
96		Sustainability of subsequent land use not considered	There is a legal requirement to maintain the open habitat as the sites are designated	
97		Questions sustainability when woodland species displaced and other woodland benefits such as air quality, dust, soil protection.		Condition (k) and (l)
98		Aspects of open habitat policy overlooked - productive sites should be avoided, and avoided where socially unacceptable. Designated site 'may' be supported and not 'will' be supported.	Sites are designated and not meeting required condition. There would need to be some other overriding public interest reason to reject the restoration of designated sites	
99		FCE state NF deforestation is a threefold increase in rate of deforestation		
100		Effect on employment low. Cannot be such to the wider economy	Deforestation under consideration is a small part of the Forest District and New Forest	
		Effect on incumbent habitats medium. This is total woodland loss	The total loss is only on the sites being considered and 95% of the woodland in the Inclosures remains.	
		Water bank erosion low. In contrast to CS where planting is encouraged to reduce flooding and erosion.		Condition (l)
		Effect on soil low. Only considers harvesting and not long term soil degradation		Condition (g)
		Carbon sequestration low. After mitigation of more data capture. Makes little sense.		Condition (k)
101		Context difficult with poor availability of data about historic loss of productive woodland.		
102		Current low level of woodland creation means removal should be balanced	There is a National balancing of deforestation against afforestation	

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	103		Significant impact on rural employment.	Timber outturn isn't impacted at the District level during the period of the project	
24			Duplicate of response 9		
25	104	BSW	ES focusses on 4 jobs created by conversion to open habitat. But barley considers impact on the 800 local jobs that depend on a secure timber supply.	Timber outturn isn't impacted at the District level during the period of the project	
	105		ES underplays loss of woodland and impact on jobs and business. No satisfactory answers about timber supply to local industry. No thought beyond 10 years.	Timber outturn isn't impacted at the District level during the period of the project	
	106		BLs won't find use in supply chain	FDP related	
	107		Lack of commitment to timber supply and investment unjustifiable for sawmills.	FDP related	
	108		No detailed assessment of economic impact and changes to local community.	FE manage their business at a National level so negative impacts are accommodated	
	109		Contrast to Gov't 25 yr plan. Maximise value and benefits from nat resources, Improve approach to soil management, Increase timber supplies, Mitigate climate change	The project plays an important role in some aspects of the plan	
	110		Contradicts FC duty to facilitate the production and supply of timber and other forest products as in the Forestry Act	Consideration for the whole design plan	
	111		Carbon sequestration loss as a result of the plan		Condition (k)
	112		Little consideration of financial sustainability	FE manage their business at a National level so negative impacts are accommodated	
26	113	Burley PC	Concerned about timing		
	114		BPC remain sceptical that felling is compatible with Gov't and tree planting	There is a balancing mechanism Nationally to consider rates of deforestation and woodland creation	
	115		Proper ground prep not assured for public access, stock. No funding in place to give certainty, example of Newlands with stumps left, pine and rhododendron colonizing		Condition (g)
27	116	Individual	Previous work there was no consultation	Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	FE to engage with local representatives. Works relevant to the EIA are limited so should be approved. Condition (i) formalises the need to consider neighbours
28	117	Historic England	No overriding objections		

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			ES needs significant alterations in order to fulfil requirements of EIA regs before support could be given		
	118		Lack of sufficient detail about heritage assets in proposed felling areas. Min expectation is an outline of baseline arcae data and map. Goes on to give further advice on what the ES should consider	Covered in OSA and there is an SLA with archaeologists in the NPA	
29	119	NF Timber Users Grp	Generations of sawmill owners rely on sustained yield from Inclosures.		
	120		Fashion for rewilding is an attractive lack of investment but gives little long term employment or income.	Open areas need to be managed. Not a rewilding project as such.	
	121		SSSI for 50 years and there has been a consistent supply of timber but will in future only support low yielding scrub species	SSSI requirements are driven by NE. Conifer isn't compatible.	
	122		National tree planting at an all-time low		
	123		Lacks support from locals evidenced through survey		
	124		Removal of conifer will reduce supply to local sawmills by 97%	FDP related	
	125		Financial sustainability of proposed habitat management precarious.		
	126		Consultation period should be extended	Consultation was extended for a month	
	127		Recognises Verderers Inclusions are recent and there will be conservation gains from clearances.		
	128		Wholesale removal of conifer will mean the NF is the only FC forest not producing timber for the Nation. NP has purpose of 'seek to foster economic and social well-being of local communities.	FDP related	
30	129	Individual	Not clear that the impact of proposal on timber consumers locally has been fully assessed.		
	130		Carbon sequestration and air pollution loss not insignificant		Condition (k)
	131		No appreciation of temp heathland from rotation forestry	SSSI requirements are driven by NE. Conifer isn't compatible.	
	132		Areas where growth is poor are obvious for heath. Remainder should not be converted.	SSSI requirements are driven by NE. Conifer isn't compatible.	
31	133	NFA	Broadly supportive. But plan needs to pass and HRA test and EIA hasn't made a serious attempt at this goal.	HRA will be relevant to the FDP.	

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	134		Relies on weak fence realignment and OSA etc. is not up to std expected from an EIA and would want a condition that an HRA is conducted	Conditions to tighten OSA. HRA will be relevant to the FDP.	Conditions (f), (i), (m)
	135		Wants a documented decision tree to show how proposals for sites are arrived at.		Condition (g)
	136		Fence line needs a more pro-active approach.		
	137		Carbon assessment is lazy		Condition (k)
32	138	RSPB/H&IoWWT	Supportive and is a significant move to a more natural forest		
	139		Agree that chosen option is only one to give a positive outcome		
	140		Appreciate role of trees with carbon but Inclosures wrong place for them and if open habitats policy of no net loss is kept to will have neutral impact.		
	141		Heathland also sequesters carbon and so a complete budget should be done if carbon is seen as an issue		Condition (k)
	142		Concern about treatment of sites after felling in particular lop and top.		Condition (g)
	143		Fences, keep around Inclosures being moved to BL		Condition (f)
33	144	Individual	Concerns about fencing		Condition (f)
34	145	Burley PC	Double logging of 26		
35	146	RSPB/H&IoWWT	Double logging of 32		
36	147	New Forest Association	Double logging of 31		
37	148	NF DC	Role that the Inclosures play in providing public recreation should be recognised and consideration given to the impact of any displaced recreational use arising from these proposals.		
	149		Reduction in local timber supplies could have a significant impact on the long term sustainability of businesses within the New Forest.		
	150		Consideration should be given to potential for compensatory woodland planting that could be of benefit to the local timber industry and provide a valuable public recreational resource while taking recreational pressures away from the more sensitive protected sites within the New Forest.		
	151		Implementation of the proposals will have a significant visual impact on parts of the New Forest		

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38	152	NPA Env and economy	broadly supportive want early involvement with planning process at implementation		
39	153	Individual	Concerns about amenity, wildlife, landscape, heritage	Norleywood. Cover in conditions. Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	
40	154	Individual	Concerns about flooding after tree removal and visual amenity	Norleywood. Cover in conditions. Felling is quite limited in extent and extends an open area so may be a mis-interpretation of the maps.	
41	155	Individual	Harm to wellbeing, heritage		
42	156	ICF	Economics. Loss of income will affect long term viability		
	157		Long term impact of proposals not picked up by the ES only looks at 10 years	The 10 year programme of work of the project is given consideration. The change is to open habitat and assesses the impacts resulting, which it assumed will endure beyond the 10 years	
	158		Bringing timber in will increase traffic if mills don't close	The Inclosures are a minor part of the supply	
	159		complete removal of coniferous species across the New Forest will increase the climatic and pest & disease threats posed by climate change	FDP related	
	160		Loss of niche habitats, for example Crossbills, Firecrests and Siskins. Stated as important but can be sacrificed as not in citation	The deforestation being considered doesn't in itself result in the loss of their conifer habitat.	
	161		relying on 1970 citation serves to replicate an earlier omission of niche habitat		
	162		Carbon sequestration reduced		Condition (k)
	163		Increase risk of importing disease because of increased need to import timber		
	164		Ministerial statement = nature people economy but ES omits economy		
	165		1859 Inclosures not to be clear-felled quotes from the Act and suggests deforestation would be illegal		
	166		Contrary to policy to plant more trees	There is a balancing mechanism Nationally to consider rates of deforestation and woodland creation	

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	167	Eliminates a long standing and integral part of the New Forest's make up, and this will be detrimental to the appearance, nature and culture and commoning	FDP related	
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